Data Submitted (UTC 11): 12/18/2023 5:00:00 AM
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December 18, 2023

Mammoth Lakes Ranger District

Attn: Eastern Sierra Climate and Communities Resilience Project

PO Box 148

2510 Main St.

Mammoth Lakes, CA 93546

Submitted electronically

Re: Eastern Sierra Climate and Communities Resilience Project

The following comments are submitted on behalf of the Center for Biological Diversity

regarding the Eastern Sierra Climate and Communities Resilience Project ("Project"), which

would authorize the logging of marten habitat and large trees, as well as within protected areas

(three inventoried roadless areas ("IRAs")).

I. Marten

The Inyo Forest Plan requires: "Within marten core habitat . . . retain overtopping and multi-storied canopy conditions, including some shade-tolerant understory trees such as firs, especially in drainages, swales and canyon bottoms and on north- and east-facing slopes." The Project's Biological Resource Review states: "Within marten core habitat, overtopping and multi-storied canopy conditions, including some shade-tolerant understory trees will be retained." However, we could not find a statement in that document, or in the draft EA, describing how this Project will "retain overtopping and multi-storied canopy conditions" in marten core habitat. This is concerning because elsewhere in the draft EA, the Project description would harm marten habitat. For example, the picture on the left in Figure 3.1-1 of the draft EA is the type of forest a marten would likely use, whereas the picture on the right would likely be avoided by marten due to its simplified structure-see, e.g., Moriarity et al 2016 (which does not appear to be cited or addressed in the Project documents): "[M]artens avoided stands with simplified structure, and the altered patterns of movement we observed in those stands suggested that such treatments may negatively affect the ability of martens to forage without increased risk of predation. Fuel treatments that simplify stand structure negatively affected marten movements and habitat connectivity. Given these risks, and because treating fuels is less justified in high elevation forests, the risks can be minimized by applying treatments below the elevations where martens typically occur." Yet the Project seeks to create conditions in the picture on the right in Figure 3.1-1 without explaining how such an outcome would be avoided in marten core habitat. We ask that more information be provided to demonstrate that "[w]ithin marten core habitat, overtopping and multi-storied canopy conditions, including some shade-tolerant understory trees will be retained."

II. IRAs

The Project documents authorize logging trees up to 24 inches in diameter in IRAs, but do not explain how 24-inch trees comply with the Roadless Rule. The documents note that "small diameter trees (<10 in. dbh) dominate the landscape as reflected in the low quadratic mean diameter (QMD) of the Project area." Given the intent of the Roadless Rule "to limit the cutting, sale, or removal of timber to those areas that have become overgrown with smaller diameter trees," a 10-inch limit should be used for the IRAs here. Moreover, the logging of 24-inch dbh trees is likely to disrupt the overstory, contrary to the Roadless Rule's direction to leave the overstory "intact." Project documents also fail to explain why trees up to 24 inches "pose an uncharacteristically high risk of fire spread and intensity." See Los Padres ForestWatch v. United States Forest Serv., 25 F.4th 649, 658 (9th Cir. 2022). Collins et al. 2011, for example, found that a diameter limit of 12 inches resulted in the same post-treatment fire behavior as higher diameter limits. And the FEIS for the Roadless Rule notes: "To reduce the fire hazard in an area, managers must deal primarily with the fine fuels on the surface of the forest floor and with the smaller diameter trees growing in the understory of a forest that provide a ladder to the larger, dominant overstory trees." North et al. (2009) addressed this, stating: "What is considered a ladder fuel differs from stand to stand, but typically these are trees in the 10- to 16-in d.b.h. classes."

III. Large trees

The Project documents state: "Prioritize retention of healthy and vigorous trees larger than 20 inches dbh with existing cavities, dead tops, lightning scars, or structures beneficial to wildlife unless removal of these trees is necessary to meet Project goals." However, no explanation is provided as to why it would be more important to meet generic "desired conditions and basal

area targets" rather than protect these rare decadent trees that often take many decades to exist and provide great benefit to wildlife. We ask that all decadent trees be retained.

IV. Carbon emissions

Table 3.6-1 purports to show emissions from a hypothetical large wildfire but does not present the data or information on which it is derived. Stenzel et al 2019 found that "regional emissions estimates using widely implemented combustion coefficients are 59%-83% higher than emissions based on field observations." We ask that the emissions be corrected in line with Stenzel et al.

Sincerely,

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