

Sierra Nevada Access, Multiple-Use and Stewardship Coalition

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Congressman Nunes, Radanovich, Herger, Doolittle and Pombo

REGARDING: Draft Supplemental Environmental Impact Statement (DSEIS) for the Sierra Nevada Forest Plan Amendment (SNFPA)

We have reviewed the DSEIS for the SNFPA and are very concerned about the direction Forest Service (FS) is headed with this Supplement to the SNFPA. We have attached our initial comments.

There is very limited time in which to move this DSEIS in an acceptable direction. We cannot afford to allow this Draft Supplement to take its natural administrative course.

Consequently, we are requesting that a congressional field hearing be conducted on the Draft Supplemental EIS for the Sierra Nevada Forest Plan Amendment. Alternatively, if there is not enough time set up a field hearing, we urge a face-to-face meeting between all of you and the Administration (Under Secretary Tenney, Under Secretary Ray, Chief Bosworth and Regional Forester Blackwell).

Briefly, the following are a few of our concerns:

1. The Draft does not “fit” with the National Fire Plan and will not “fit” with the Healthy Forests Initiative legislation. Over 7.5 million acres in the Sierra Nevada range are in Condition Class 3 and 2 (very high to high risk of catastrophic fire). The Supplement will move only 11% (800,000 acres) to Condition Class 1 in the first decade.
2. The Draft proposes to use an **experimental** fuels treatment method that has only been computer modeled and not tested on the ground. We need a fuels treatment method that has a proven efficacy such as Defensible Fuel Profile Zones (DFPZs).
3. Chief Bosworth suggested and Regional Forester Blackwell proposed to review Alternative 4, 6 and 7 in the FEIS and use those aspects of these Alternatives that would accelerate the fuels reductions. This has not been done.
4. The Draft specifically excludes the 11.5 million acres in the Sierra Nevada range from the production of forest products as a primary management objective. This

- is contrary to existing laws and statutes and precludes revenue generation from merchantable timber that would support an accelerated fuels reduction program. The result is that funding for fuels reduction projects are the purview of congressional appropriations and tax paying citizens.
5. Analysis in the Draft does not support the retention of all 30" dbh or greater trees. The desired condition is 6-7 trees per acre >30" dbh. Current inventories and modeling show approximately 10 trees per acre >30" dbh.
 6. The SNFPA and the Supplement will move the forests to an unacceptable level of closed canopy which is contrary to the pre-European condition of the forests, exacerbates growth of shade tolerant species, and threatens the multitude of species that need early and middle seral conditions for their survival.
 7. Impacts to recreation through revisions of the standards and guides have not been addressed as promised by the Regional Forester. The DEIS only clarifies that **some** of the limited operating periods apply to vegetative treatments only and not to recreational activities. There are many stands and guides that will cause a significant impact on recreational activities.
 8. The Region initiated an 18 month review of the FEIS and the ROD in light of new information and we were encouraged by the direction of the review and the report generated by the review team. However, we can find no evidence of their work in the DSEIS. It appears that 18 months of effort disappeared into the ether.
 9. I was present at the Resource Summit in Sonora and heard Regional Forester Blackwell state that USF&W decided not to list the spotted owl based on the standard and guides in the ROD. He inferred that USF&W would not allow much movement from the ROD. We find this especially egregious. Earlier this year USF&W reversed its opinion about the unacceptable short term impacts to T&E species due to mechanical treatments. USF&W also agreed to expedite the biological review of plans that reduce the fuels. It seems to me that USF&W has as much responsibility as the FS to prevent the devastating loss of wildlife habitat due to catastrophic fire.
 10. At the same meeting, Mark Rey gave an overview of the efforts and support of the administration and the Congress to prove the FS with more assistance through the Healthy Forests Initiative. He clearly stated that in order to reach the first decade goal of the National Fire plan, **fuels reduction activities need to be accelerated five to seven times**. It appears to me that the Under Secretary has not read the DSEIS. How can the FS propose a plan that is clearly out of compliance with the administration's and congressional goals?

We also suggest that the same Washington Review Team that evaluated the SNFPA and the ROD (which I have attached), evaluate S2, the Preferred Alternative under the same guide lines.

The local Resource Conservation District, TuCare and the Americans For Forest Access (AFFA) have expressed support for our request for your intervention in this process to move the SDEIS toward an acceptable direction.

Respectfully submitted,

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SAMS Coalition

Enclosures

Cc: Regional Forester Jack Blackwell, USFS Region 5
Mark Rey, Under Secretary, USDA Natural Resources and the Environment
Dave Tenney, Under Secretary, USDA