

Subject: Cleveland-Ice House Comments

From: Ben Solvesky <ben@sierraforestlegacy.org>

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To: Travis Thane <tthane@fs.fed.us>, "Thornburgh, Richard M -FS" <rthornburgh@fs.fed.us>, comments-pacificsouthwest-eldorado@fs.fed.us

CC: "Nelson, Duane -FS" <dnelson03@fs.fed.us>, Sue Britting <britting@earthlink.net>

Hi Travis and Richard,

Thank you both for working with me on this project. I appreciate your commitment to try something different within the plantations. Also a big thanks to Duane and Dana. I am happy to hear that the Eldorado will begin to attempt to convert plantations to more natural conditions. We may not get it right the first time, so we all need to keep an open mind and be willing to adaptively manage plantations and change modify the methods as we learn what works and what does not. We have a lot of work ahead of us on this front and I am really looking forward to the post-treatment field trips. For me, this is the fun stuff.

I am disappointed that I did not receive the spotted owl information I asked for at our meeting (a map defining treatments within 0.7 mile of CSO territories) in early December and when the scoping notice went out. Not receiving this information makes it considerably more difficult to comment on CSO issues within the project area. As such, I ask that you implement the spotted owl Interim Recommendations within any natural stand within 0.7 mile of a CSO territory (specific guidance attached). Although I have less concern about the intensity and methods of plantation treatment within CSO territories (as long as we are moving toward more natural conditions), I do think that it would be good to raise this issue with CSO scientists and others as we move forward with SoFAR.

I also have concerns about the potential cumulative effects of the Farm Bill Forest Health Categorical Exclusions on spotted owls and other Forest Service Sensitive Species. As you are well aware, there are serious concerns about CSO viability on the Eldorado (Tempel and Gutierrez 2013, Tempel et al. 2014, King Fire, Trestle, etc. are cumulatively very concerning and certainly cause me to believe that species viability has already been compromised on the forest). By not completing an Environmental Analysis or an Environmental Impact Statement for the proposed project, the Forest Service has not thoroughly or transparently analyzed the cumulative effects (i.e., death by a thousand cuts) of the CE authority and other treatments on CSO through the NEPA process. This raises serious concerns and is an issue I will be tracking as more and more projects are implemented via the Farm Bill CE authority in natural stands.

Finally, as you are all aware and I have brought up numerous time during this process, the Farm Bill CE authority is specific to insect and disease treatments. While I agree there is a correlation between thinning and reductions in insect and disease, I certainly don't buy the idea that thinning automatically increases resilience or resistance to insects and disease and I have significant concerns that the CE authority will be abused. I cannot thank Duane enough for working with me on this issue on Pilliken and helping to reduce my concerns. His efforts there go a long way to building the trust we will need to have a productive collaborative. That said, I would like to visit some of the natural stands within the Cleveland-Ice House project footprint. When we met in December it did not appear we were going to be able to get out there until the snow melted in spring, but I drove by Ice House Road last Thursday and all of the snow had melted due to the warm rain, meaning we could probably get out there on any clear day without much trouble (that is if Duane is not behind the wheel). There are a few natural stands in the southeastern portion of the project area I'd like to take a look at.

Feel free to contact me if you have any questions or concerns about these comments.

Sincerely,

Ben

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— Attachments: —

PSW CASPO IR 29May2015.pdf	928 KB
IRs translated into forest planning terms central SN 9-21-15.docx	33.6 KB
Tempel and Gutierrez.2013.CSO.Occupancy.ELD.pdf	474 KB
Tempel.et.al.2014.CSO.ELDO.Population Model.pdf	932 KB