

**Subject:** Summit CE

**From:** Ben Solvesky <ben@sierraforestlegacy.org>

**Date:** 1/26/2016 11:13 AM

**To:** comments-pacificsouthwest-sequoia@fs.fed.us

**CC:** Sue Britting <britting@earthlink.net>

Dear Steve Anderson,

These comments are submitted on behalf of Sierra Forest Legacy. We submitted comments on the larger Summit Fuels Reduction and Forest Health Project on October 12, 2015 (attached). We believe our comments on the larger Summit project remain relevant to the Summit CE project, regardless of the scale at which the project is implemented. That is, the Interim Recommendations for the Management of California Spotted Owl Habitat on National Forest remain the best available scientific information for managing spotted owl habitat in order to arrest current declining trends and maintain species viability (IRs and IR Translation attached). In addition to the concern we raised in our October 2015 Summit scoping comments, we are also concerned about the cumulative effects of the Farm Bill CE authority to at-risk species and we are concerned about the potential long-term negative consequences of thinning during a beetle outbreak to increase forest health.

There are serious concerns about spotted owl viability on all Forest Service-managed lands in the Sierra Nevada (Conner et al. 2013, Tempel and Gutierrez 2013, Tempel et al. 2014a) and these declining trends have been linked to logging within spotted owl territories (Seamans and Gutierrez 2007, Tempel et al. 2014b). As such, we are concerned about the potential cumulative effects of the Farm Bill Forest Health Categorical Exclusions on the spotted owl and other at-risk species. There are also serious concerns about the cumulative effects of logging within high quality fisher habitat in the Greenhorn Mountains. Many projects have recently been completed, are being implemented, or are proposed in the vicinity of the proposed action (e.g., Summit, Tobias, Rancheria, Ice) that are within high quality fisher habitat and an important fisher corridor. 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 Farm Bill CE authority and other treatments on spotted owls or Pacific fishers through the NEPA process. This raises serious concerns and is an issue we will be tracking as more and more projects are implemented via the Farm Bill CE authority in natural stands.

We also believe that the proposed project is likely to negatively affect the ability of the project area to adapt to climate change and future insect outbreaks. There is no evidence that thinning in the midst of a beetle outbreak will increase the resilience of the forest to insect mortality (Six et al. 2014). In fact, there is compelling evidence that attempting to thin a forest in the midst of an outbreak will do more harm than good. Thinning reduces insect and fire resilience of the residual tree over the short term due to impacts associated with site disturbance and Six et al. (2014) suggest that some trees are resistant or not targeted by beetles during an outbreak due to factors attributable to tree genetics. For these reasons, the authors suggest managers attempting to "do something" are likely to inadvertently thin those trees that are genetically programmed to survive outbreak events and reduce short-term resilience of residual trees. For these reasons, it is better to let an outbreak take its course than attempt to thin during an outbreak.

It is also worth noting that we have just experienced the worst drought in 1,200 years. Since beetle outbreaks are triggered by climatic events that reduce tree resistance to beetle attacks, it is reasonable to conclude that the worst drought in 1,200 years would spark a beetle outbreak proportional to such a climatic event. A silvicultural response to such climatic conditions is likely to be costly and ineffective at best

and detrimental to individual tree health and long-term adaptability of the forest at worst. To provide for forest adaptability to climate change and future beetle mortality events, we ask that no green trees be removed as part of the proposed action and only those trees that pose a threat to human life and infrastructure be targeted for removal.

Please contact me if you have any questions.

Thank you for your time and considering these comments,

Ben

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— Attachments: —

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SFL.Summit.Scoping Comments.October 2015.docx	95.0 KB
PSW CASPO IR 29May2015.pdf	928 KB
IRs translated.southern SN 9-30-15.docx	44.1 KB
Conner.et.al.2013.CSO.Population Change.pdf	959 KB
Tempel.et.al.2014a.CSO.ELDO.Population Model.pdf	932 KB
Tempel and Gutierrez.2013.Occupancy.ELD.pdf	474 KB
Tempel.et.al.2014b.CSO.Effects of Forest Management.pdf	3.9 MB
Seamans and Gutierrez.2007a.CSO.Habitat Alteration.pdf	308 KB
Six.et.al.2014.Beetle Outbreaks.Effects of Harvest to Suppress.pdf	331 KB