



Sierra Forest Legacy
Protecting Sierra Nevada Forests and Communities



September 21, 2015

Victor Lyon
District Ranger
American River Ranger District
Tahoe National Forest
22830 Foresthill Road
Foresthill, California 95631

Sent via email to: pacificsouthwest-tahoe-american-river@fs.fed.us

Re: Comment on the Proposed Cuckoo Vegetation Management and Fuels Reduction Project Scoping Notice

Dear Victor Lyon:

We have reviewed the notice of scoping for the proposed Cuckoo Vegetation Management and Fuels Reduction Project and the purpose and need document. Based on our review of these documents, it appears that the proposed action is likely to reduce forest canopy cover in several California spotted owl territories. Due to serious concerns for the long-term persistence and viability of the species throughout the Sierra Nevada, the Forest Service finalized the Interim Recommendations for the Management of California Spotted Owl Habitat on National Forest System Lands (IRs) on May 29, 2015 (Appendix A). As per our settlement agreement with the Forest Service (Appendix B), the Forest Service is required to develop a proposed action or alternative based on the IRs for all projects proposed after the completion of the IRs.

There has been a documented decline in spotted owl populations on all Forest Service-managed lands with long-term data in the Sierra Nevada over the past 20-plus years. Within only a few miles of the project boundary is the Eldorado demographic study area (ELD). The ELD is the spotted owl population with the largest known decline in the range of the species. Between 1990 and 2012, the population on the ELD declined by as much as 61 percent (Tempel et al. 2014a). In addition to this decline, a portion of the ELD and surrounding area burned in the King Fire in 2014. According to the biological evaluation for the King Fire, 10 spotted owl territories were immediately destroyed and habitat within 22 territories will be degraded and risk territory abandonment due to the effects of salvage logging. The decline of a very large population adjacent to the project area makes maintaining and improving habitat conditions of the nearby remaining territories all the more urgent.

The spotted owl decline on the ELD has been associated with moderate intensity timber harvests, consistent with Forest Service fuels treatments (Tempel et al 2014b). Data also suggests that moderate intensity timber harvest have habitat repercussions that last more than 30 years (SNAMP 2015). As a result of the correlation between fuels treatments and the decline, **the IRs were developed by a team of scientists to provide interim recommendations on changes to forest management and constitute a suite of measures that individually hold promise and**

support in scientific literature pertaining to owls and forest ecology. The IRs should be considered the best available science when designing and implementing a timber harvest project after May 2015.

To help aid in the development of an alternative for Cuckoo and other forest projects that may affect spotted owl habitat, we translated the IRs for the central Sierra Nevada into plan components to inform the design of a project (Appendix C). This translation is adapted from one prepared by Region 5 for the forest plan revision process in the southern Sierra Nevada.

Thank you for your time and attention. Please direct any questions or comments to Ben Solvesky (ben@sierraforestlegacy.org; 928-221-6102).

Sincerely,

A handwritten signature in blue ink, appearing to read "Ben Solvesky". The signature is fluid and cursive, with the first name "Ben" and last name "Solvesky" clearly distinguishable.

Ecologist
Sierra Forest Legacy
PO Box 244
Garden Valley, CA 95633

References

SNAMP (Sierra Nevada Adaptive Management Program). 2015. Draft Sierra Nevada Adaptive Management Program Final Report: Appendix C. California Spotted Owl Team Report.

Tempel, D.J., M.Z. Peery, and R.J. Gutierrez. 2014a. Using integrated population models to improve conservation monitoring: California spotted owls as a case study. *Ecological Monitoring* 289:86-95.

Tempel, D.J., R.J. Gutiérrez, S.A. Whitmore, M.J. Reetz, R.E. Stoelting, W.J. Berigan, M.E. Seamans, and M.Z. Peery. 2014b. Effects of forest management on California spotted owls: implications for reducing wildfire risk in fire-prone forests. *Ecological Applications* 24:2089-2106.

USDA Forest Service. 2015. Draft Environmental Impact Statement, King Fire Restoration Project Volume 1. USDA Forest Service R5-MB-292. May 2015.