



June 2, 2015

Russell Hays, Forest Supervisor
Lassen National Forest

Dear Mr. Hays,

On behalf of the John Muir Project of Earth Island Institute and the Center for Biological Diversity, we are submitting the following supplemental comments on the draft Environmental Assessment (EA) for the proposed Eiler Fire Salvage and Restoration Project (Eiler project).

Since the comment deadlines for the Bald and Eiler post-fire logging project EAs, significant new information has arisen that contradicts key conclusions in the EAs and Black-backed Woodpecker specialist reports regarding Black-backed Woodpecker (BBWO) populations and trends in the Sierra Nevada.

Appendix A of Roberts et al. (2015) (see attached), which was conducted for the Forest Service by Point Blue Conservation, found that a “sharp decrease” in BBWO populations is occurring in unburned forests throughout the Sierra Nevada in recent years (see Roberts et al. 2015, p. 39), and concluded that the data indicate a “strong change in green forest occupancy” appears to be occurring (Roberts et al. 2015, p. 40, and Figure A.1 on page 42). Roberts et al. (2015), Appendix A (pp. 39-42), hypothesized that BBWOs that previously occurred in unburned forest may have been increasingly moving into burned forest in recent years, as the last three years have had above-average fire amounts. Given this, for populations to be stable overall (in the face of declining populations in unburned forest), occupancy would have to increase substantially in burned forest recently. However, this is not the case; in a separate study conducted for the Forest Service by the Institute for Bird Populations specifically in burned forest, the authors found that occupancy in 2013 and 2014 were the lowest since the study began in 2009, and 2014 was the lowest year of all (page 2 of Siegel et al. 2015—see attached). Neither Roberts et al. (2015) nor Siegel et al. (2015) assessed their results in light of the other, so neither had the complete picture in terms of current BBWO population trends in the Sierra Nevada. The current declines are consistent with projections of Odion and Hanson (2013), given the amount of BBWO habitat that has been logged in recent fires (about 50%, or more, in the 2013 fires: Rim fire, American fire, and Aspen fire, e.g.—similar or higher cumulative amounts are proposed for logging in Bald and Eiler).

In light of this significant new information, an EIS must be prepared, or at least a supplemental EA (with additional public comments allowed), to evaluate whether an EIS is required. We look forward to hearing from you on this issue.

Sincerely,

Chad Hanson, Ph.D., Director
John Muir Project of Earth Island Institute
P.O. Box 697
Cedar Ridge, CA 95924
530-273-9290
cthanson1@gmail.com

Justin Augustine, Attorney
Center for Biological Diversity
351 California St., Suite 600
San Francisco, CA 94104
415-436-9682, ext. 302
jaugustine@biologicaldiversity.org