**Strategically Treating Fuels in the Scottiago Project Area with Adjustments for the Highest Quality Spotted Owl Habitat**

**April 12, 2018**

We, Foothill Conservancy, Central Sierra Environmental Resource Center, and Sierra Forest Legacy, are responding to the District’s request for suggested strategies and conservation measures for the Scottiago Project area. This brief letter describes what we see as middle-ground proposed actions that we believe will be acceptable to the diversity of interests in the Amador Calaveras Consensus Group. The conservation measures described are not designed to reflect our groups’ ideal conservation measures for the project area. Instead, we intentionally made concessions when developing the proposal out of respect for other ACCG member’s objectives. We remain open to thoughtful discussions and modifications to what we propose, and several of our conservation measures require that site-specific decisions be made during the planning process.

Findings that helped inform the development of our conservation measures:

* North et al. (2017) is a recently published study that used LiDAR data to help determine habitat selection by spotted owl pairs in four large study areas in the Sierra Nevada. The results of this study found that spotted owl pairs are not simply selecting high canopy cover forest areas for nesting and roosting; more specifically, the study found that they are selecting areas dominated by taller trees (>32 meters) with higher canopy cover (>55%).
* Jones et al. (2017, p. 7) suggest that without an increase in high canopy cover forest dominated by large trees, the spotted owls are likely to continue to decline and “total population extinction is not a foregone conclusion.”
* The U.S. Fish and Wildlife Service’s Conservation Objectives Report for the California spotted owl states (Service 2017, p. 27, emphasis added): “Design thinning treatments to minimize loss and/or recruit large (≥24 in) and very large (≥36 in. dbh) trees and snags. Modeling indicates that thinning treatments of trees at 12, 20, and 30 in. dbh could yield a similar reduction in burn probability (Collins et al. 2011b), so removal of smaller trees, rather than larger ones important to CSO habitat, should be prioritized.”
* Stated management direction for spotted owl Home Range Core Areas in the 2004 Forest Plan Amendment (Record of Decision, p. 46): “Arrange treatment patterns and design treatment prescriptions to avoid the highest quality habitat (CWHR types 5M, 5D, and 6) wherever possible.”
* According to Gutierrez et al. (2017, p. 274), “…treatments in home ranges containing habitat conditions known to promote reproduction, survival, and territory occupancy, and where forests did not depart appreciably from the “natural range” of variability are likely to be more detrimental to owl populations.”

We believe the proposed action for the Scottiago Project should incorporate the findings of North et al. (2017) to be consistent with the management direction for HRCAs in the forest plan and the Service’s conservation recommendation related to minimizing the loss of trees larger than 24 inches dbh. We are under the impression that LiDAR data is available for the Scottiago Project area. LiDAR data is much more accurate and precise than EVEG (i.e., the older and more widely used remote sensing tool used to identify and classify forest structure) at identifying high quality spotted owl habitat. As such, LiDAR can be used to discern smaller patches of higher quality spotted owl habitat from the surrounding forest – i.e., identify smaller inclusions composed of taller trees (>32 meters) with higher canopy cover (>55%), consistent with the methods of North et al. (2017).

In light of the defined management intent of HRCAs, the results of North et al. (2017) and Jones et al. (2017), GRT 220, and the conservation recommendation defined in Service (2017), we propose that the Scottiago Project include the following conservation measures:

* Promote heterogeneous or patchy stands comprised of small openings (generally ¼ to 1 acre in size), denser patches and clusters of medium to large trees, and lower density areas of scattered trees – basically the ICO approach described in GTR-220.
* Where they are found, trees with characteristics that provide high quality habitat for species associated with higher densities of larger trees - e.g., trees and snags with cavities or multiple tops - would be retained.
* Shade tolerant species - white fir and incense cedar - would be favored for removal while ponderosa pine, Jeffrey pine, sugar pine, and Douglas-fir would be favored for retention.
* Within California spotted owl HRCAs, more intensive thinning and the creation of small openings would be the treatment in areas dominated by shade tolerant trees less than 18 inches dbh, while still retaining any denser clusters of larger trees. Current diameter limits allowing the removal of trees up to 29.9” dbh would apply.
* In forest patches >2 acres in size dominated by trees >32 meters tall and >55% canopy cover in HRCAs, treatment would be limited to removing trees <24 inches dbh, and treatments would maintain canopy cover >55%, except where areas only currently contain pre-treatment canopy cover of 60% or less. In those areas, treatments would maintain canopy cover >50%.
* In spotted owl HRCA-habitat located in areas of strategic importance for fire management, treatments would be designed to create fire control points that focus on firefighter safety and treatment longevity (e.g., creating a shaded fuel break), rather than maintaining high quality spotted owl habitat.
* Treated areas should include broadcast burning as a follow-up to mechanical treatment wherever possible.
* Occupancy status of a territory could also be useful to help define treatment intensity. For example, in a territory with a history of being unoccupied, greater treatment intensity could be warranted in stands with forest conditions that are misaligned with forest health resilience metrics.

This proposal aims to produce an ACCG-supported CE project in an area dominated by HRCA acres, while protecting key owl values, helping meet timber targets, and reducing wildfire risk.