March 1, 2017

Mr. Kevin Elliott – Forest Supervisor, Sequoia National Forest
Mr. Eric La Price – District Ranger, Western Divide RD
Mr. Alfred Watson – District Ranger, Kern River RD
1839 South Newcomb Street
Porterville, CA 93257

Subject: Addendum to February 27, 2017 Additional Comments Regarding Consideration of Additional New Information and Circumstances that Require Supplemental NEPA Analyses for the Frog, Rancheria and Other Projects

Messrs. Elliott, La Price, and Watson,

On February 28, 2017, we received an email notice from the Forest Service's Research and Development branch, titled "March Newsletter: Agroforestry | Tree Mortality | West Nile | More." *See* Exhibit 1, attached.

One of the topics in this Newsletter is highly relevant to the first issues we raised in our letter, namely that the Frog, Rancheria, and other project analyses must consider and analyze the expected mortality in 2017 and beyond.

In its November 2016 news release about additional mortality, the agency stated that "Forest Service scientists expect to see continued elevated levels of tree mortality during 2017 in dense forest stands, stands impacted by root diseases or other stress agents and in areas with higher levels of bark beetle activity." http://tinyurl.com/ztvqts6. In response, we stated that the Forest Service must also analyze the effects from the continued elevated levels of tree mortality, expected by their own scientists to occur during 2017, in their supplemental analyses for the Frog, Rancheria, and other affected projects.

Now, Forest Service's scientists have provided evidence that they have a way to forecast mortality in the Sierra Nevada Mountains. The link in the newsletter (http://usfs.maps.arcgis.com/apps/MapJournal/index.html?appid=7b78c5c7a67748808ce298efefceaa46) provides a set of maps and images that provide detailed information about the forecasted mortality in 2017.

Attached as Exhibit 2 are screenshots of those maps and images relevant to the Frog and Rancheria areas of the Sequoia National Forest. Page 3 of Exhibit 2 includes a screenshot of the Sequoia National Forest, and we have identified the rough location of the Frog and Rancheria projects. The write-up on that page states:

The 2017 Forecast

The forecast is based on history of drought (amount of precipitation) and bark beetle attacks in each 2.5' (6.5 square mile) grid cell from 1993 to 2016. Cells with similar histories of bark beetle activity and precipitation were then grouped together into ten risk (color) groups. These risk groups (R) forecast a range of the likely number of trees expected to die from bark beetles by the end of summer 2017.

The map on that same page and the legend on that page indicate that the entire Frog and most of the Rancheria project areas are in the red squares, which are labeled as category "R9," with a small amount of the Rancheria area in category R8. Pages 4 and 5 of Exhibit 2 describe the categories as follows, with accompanying photographic examples:

Category R8

Dead trees common throughout, with mortality affecting hundreds of acres on average. This category is expected to have 570 to 1,800 dead trees per square mile.

Category R9

Large areas of intense mortality. This category is projected to have between 2,000 to 14,000 [dead] trees per square mile.

Given the fact that the Forest Service is able to forecast additional mortality in 2017 (and likely beyond), it must incorporate these forecasts into its supplemental NEPA analyses.

For Sequoia ForestKeeper, the John Muir Project or Earth Island Institute, and the Kern-Kaweah Chapter of the Sierra Club,

René Voss – Attorney at Law
15 Alderney Rd.
San Anselmo, CA 94960
renepvoss@gmail.com

Ara Marderosian
Sequoia ForestKeeper and Kern-Kaweah Chapter of the Sierra Club

Dr. Chad Hanson
John Muir Project of Earth Island Institute