



Stanislaus National Forest  
Attn: Rim Recovery  
19777 Greenley Road  
Sonora, CA 95370

June 14, 2014

Dear Supervisor Skalski,

Based on our collaborative efforts with national forests in Southern California, we were hopeful that the Draft EIS (DEIS) for the Rim Fire salvage logging plan would reflect our input during the scoping process. We are disappointed the draft plan is essentially identical to the original proposal.

**The most obvious omission in the DEIS is the proper use of the best available science regarding the impact of salvage logging on plant and animal habitats.**

Although the DEIS often acknowledges the negative impacts of salvage logging, it concludes that those impacts are not important because they, “do not meet the purpose and need to capture the economic value” of the salvaged logs (DEIS p. 46 and elsewhere). The DEIS states,

“Salvage logging is controversial because few short-term positive ecological effects and many potential negative effects have been associated with post-fire logging” (DEIS p. 302).

And although the DEIS acknowledges the uncertainty of the role salvage logging plays in reducing future fire behavior, it repeatedly implies that the post-Rim Fire landscape is an extremely dangerous one because the burned trees “could result in a fire with intensity similar to that seen during the Rim Fire” (DEIS p. 143). The DEIS states,

“...the effectiveness of the various treatments proposed is difficult to predict and there is considerable uncertainty with how salvage logging influences future fire” (DEIS p. 330).

**Salvage logging represents the old silvicultural model that has been responsible for seriously damaging the ecological health of the forest.** It has been the desire to “capture the economic value” of trees, as reflected in the current DEIS, that has created the overly dense, usually even-aged second growth forest so derided by the Forest Service. The role played by past fire suppression for current forest conditions is commonly overstated and unsupportable.

We urge the staff of the Stanislaus National Forest (SNF) to modify its post-fire activities to reflect the science and the new US Forest Service Ecological Restoration Implementation Plan rather than the approach detailed in the DEIS.

With a rapidly changing climate, loss of habitat, and a growing population in need of wild places to enjoy, we cannot afford to allow the short term economic gain of salvaged logs determine our land management actions. We address four areas where the DEIS is severely inadequate.

## **Fire**

One of the legacies of the outdated silvicultural model is viewing valuable non-conifer habitat as “fuel.”

Words have significant impacts on how we view the world. When the forest is seen as a mix of “fuel” rather than habitat, management actions are skewed in relation to that perspective. As a consequence, burned trees become Coarse Woody Debris (CWD) in need of removal. Predictions are made based on modeling for potential fire rather than the potential for habitat support. For example, the explosive populations of insects that occur in burned trees, and the resulting trophic support for a wide diversity of animal life, plus plant community benefits, are remarkably ignored in the DEIS.

Allowing for natural succession in most of the burned area is dismissed because, in part, “it does not meet the need to reduce fuels for forest resiliency in those areas left unlogged,” and “would make future fire difficult to manage and contain...” (DEIS p. 47).

The DEIS fails to provide adequate evidence for such statements. In fact, the DEIS ignores a large body of evidence that refutes the Forest Service’s assumptions concerning the impact of salvage logging that were presented in scientific references provided during the scoping process by numerous scientists. Even when the DEIS cites papers that offer contrary data, it ignores the primary conclusions. For example, while the DEIS cites Donato et al. 2006, a paper that concludes post fire logging hinders regeneration and increases fire risk, it only does so in reference to a minor point about soil, not fire (DEIS p. 211).

Such poorly attributed or ignored research does not meet the EIS standard for using the best available science.

## **Habitat**

The DEIS continually recognizes the negative impacts of salvage logging on habitat in general and for particular species. The DEIS states,

- Long-term over several decades, large snags and large down woody material are considered biological legacies in the post-fire environment and play

important roles in the structure of the future forest (Lindenmayer et al. 2008) (DEIS p. 239).

- Post-fire salvage harvest is identified as a risk factor for great gray owl (Hull et al. 2010). Salvage harvest of fire-killed trees and salvage harvest of roadside hazard trees primarily removes snags and existing down woody material (DEIS p. 319).
- Salvage logging and the removal of hazard trees along level 2 roads would modify suitable marten habitat by reducing its quality in both the short-term (10 to 20 years) and in the long-term (20 to 50 years) (DEIS p. 344).
- Past, present, and foreseeable future timber harvests and hazard tree removal sales on public lands have and will likely affect habitat suitability for marten through the removal of large trees, reduction in canopy cover, and potential loss of snags and downed woody debris from prescribed fire operations (DEIS p. 349).

The DEIS also acknowledges up to 64% of black-backed woodpecker habitat and up to 59% of the predicted black-backed woodpecker pairs would be eliminated by the proposed salvage logging project (DEIS p. 386). The U.S. Fish and Wildlife Service has indicated the species may be a candidate for Threatened or Endangered status. A US Forest Service organized group of scientists recommended that a minimum of 75% of black-backed woodpecker pairs within the Rim Fire area be retained (DEIS p. 46).

The DEIS also acknowledges that there are 5 nest sites of the Sensitive species California spotted owl within salvage logging units and 26 nest sites within a quarter mile of salvage logging units (DEIS p.316).

**Unfortunately, the DEIS dismisses these important issues and recommendations relating to habitat because they interfere with the “need” to capture the economic value of the salvaged logs.** Such an approach violates the intent of the Region 5’s Ecological Restoration Implementation Plan and fails to adhere to one of the main Goals of the 2010 Forest Plan Direction for the Stanislaus National Forest.

Provide habitat for viable populations of all native and desired non-native wildlife, fish and plants. Maintain and improve habitat for Threatened and Endangered species and give special attention to sensitive species to see that they do not become Federally listed as Threatened or Endangered.

## **Alternatives**

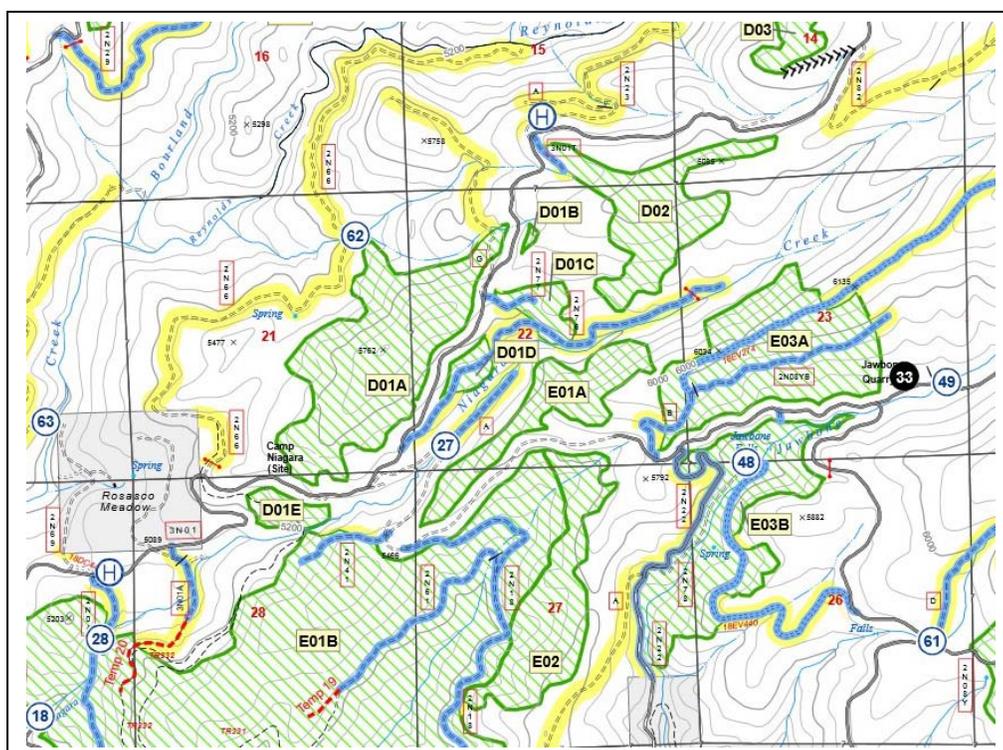
The DEIS does not provide adequate alternatives. There is barely a 2,000 acre difference between Alternative 1 (28,326 acres) and the other salvage logging options. No clear explanation is given as to how or why salvage logging areas have been chosen.

For example, during our field observations conducted during the last week of May, 2014, we found large areas of forest slated for salvage logging that fit in well with the aftermath of a mixed severity fire one would expect to find in a forest of this type.



**Fig. 1 Above.** Image of the northern side of FS Road 3N01. Note mosaic burning pattern. Yellow line is within Salvage Unit #D01A and represents 500 feet.

**Fig. 2 Below.** Tractor salvage logging units in green. Unit #D01A is center left.



Such mosaics of low, medium, and high severity fire within this type of forest are perfectly natural and represent a pattern frequently cited as the desired condition by the Forest Service. The distance between dead trees and new seed sources is less than 500 feet. To enter such areas to remove burned trees by tractor logging will only perpetuate management errors of the past. The soil will be severely disturbed, seedlings will be crushed, and valuable post-fire habitat will be compromised. Such practices have caused the dense, second growth forest the US Forest Service continually cites as undesirable.

It is time to change the pattern, stop the disturbance, and allow the forest to recover in a manner that will create the old-growth ecosystem that was eliminated through industrial logging and tree farming of the past.



**Fig 3.** Mosaic burning. This photo shows the healthy mosaic created by the fire in Salvage Unit #D01D slated for tractor logging.

As stated in the DEIS, the mixed severity fire pattern is found throughout the Rim Fire area.

In summary, the Rim Fire was a classic mixed severity fire, not only across the entire fire, but at all watershed scales. Patch size of each soil burn severity class in this mosaic was also mixed – some patches hundreds to several hundreds of acres, others tens to hundreds, and yet others where all three classes occurred within ten acres (DEIS p. 251).



**Fig. 4. Above.** Post-fire recovery. This area is along USFS road 3N01 near the junction of USFS road 1N07. It is slated for tractor logging, the most disruptive form of logging disturbance.

**Fig. 5. Left.** A conifer seedling from the area shown above along with two ceanothus seedlings in the foreground.

## “Fuel” Treatments

Although the DEIS continually cites the need to remove standing dead trees to reduce future fire severity and increase suppression control, the emphasis ignores the fact that such treatments have questionable value when placed in wildland areas rather than strategic locations around assets at risk.

The Sierra Pacific Industries in-holding along USFS road 1N04 was a checkerboard of clear cuts and recovering forest when the Rim Fire hit. As can be seen in the image below, the fire continued to burn severely throughout this “fuel” treatment.



**Fig. 6.** Sierra Pacific Industries in-holding. This area is approximately 4 miles x 1.5 miles in size. Most of the forested areas within were burned at high severity.

We do not discount the value of vegetation treatments to protect communities and specific, valued assets. But the wholesale removal of burned trees as proposed in the DEIS is excessive and does not meet the standard of using the best available science.

As we stated in our scoping letter of January 1, 2014,

“...the Rim Fire Recovery Project represents a step backward by attempting to justify management actions (salvage logging) to support industrial tree farming and timber production as ecological restoration.

Although we understand the desire to ‘capture the economic value’ of dead trees, the environmental cost will be in excess of whatever profit is gained.”

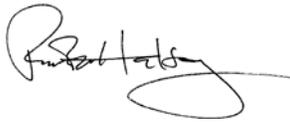
The wealth of research indicating that salvage logging causes significant environmental damage has been ignored by the DEIS. This is a clear violation of the the planning rule stating that Forest Service officials shall use the best available scientific information (BASI) to inform the planning process.

After we sent our scoping letter, yet another research paper (Leverkus et al. 2014) was published that concluded that **“post-fire salvage logging alters species composition and reduces cover, richness, and diversity in Mediterranean plant communities.”**

The cited paper is included with this letter.

The science is clear. The proposed salvage logging plan outlined in DEIS is not supportable. If any salvage logging is to be done, it needs to be limited to areas near communities and infrastructure that involve threats to public safety.

Sincerely,



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**Citations**

Alexandro, B.L., J. Lorite, F.B. Navarro, E.Pl Sanchez-Canete, and J. Castro. 2014. Post-fire salvage logging alters species composition and reduces cover, richness, and diversity in Mediterranean plant communities. *Journal of Environmental Management* 133: 323-331.