



January 2, 2014

Stanislaus National Forest

Attn: Rim Recovery

19777 Greenley Road

Sonora, CA 95370

**RE: Rim Fire Recovery (43033) Scoping Package**

Thank you for the opportunity to review and comment on the above project.

This project is to capture the economic value of hazard trees and dead trees to pay for their removal and potentially for other future restoration treatments, while providing for greater worker and public safety, reducing fuels for future forest resiliency and improving road infrastructure to ensure proper hydrologic function.

The Central Sierra Audubon Society recognizes that several critical wildlife species lost habitat within the Rim Fire, and agrees with comments in the Scoping document that "providing opportunities to return forests to this area is critical for sustainable populations and connectivity of habitat for wildlife movement and expansion." Because it appears that there is far more salvageable wood than the local logging community can handle, we believe that the project should focus on non-controversial areas and practices so that further environmental impacts can be avoided.

Please address the following issues in the Environmental Impact Statement which will be prepared for this project.

- **Page 4- The project proposes 6 miles of new road construction.** These appear to be permanent roads. Road minimization within the Stanislaus Forest is valuable to wildlife. It appears that there will be more salvage wood than the local logging community can handle even from areas where new roads are not necessary. Please address the necessity, given the above, and environmental impacts of adding these new roads.
- **Page 4- The project proposes 22 miles of new temporary road construction.** Road minimization within the Stanislaus forest is valuable to wildlife. It appears that there will be more salvage wood than the local logging community can handle even from areas where new roads are not necessary and there are other areas where old closed roads can be re-opened. Please address the necessity, given the above, and environmental impacts of adding these new temporary roads.
- **Page 7 Table 1- The Project proposes to exclude mechanical harvesting within 15 feet of streams and to allow skidding of logs within 25 feet of streams.** We are concerned that these setbacks are not adequate to protect water quality and that the encroachment

will threaten birds and other wildlife who rely on these riparian habitats. Please address the environmental impacts of these minimal setbacks on water quality and wildlife.

- **Page 8- Cable logging- The Project proposes cable logging on steep slopes.** It appears that there will be more salvage wood than the local logging community can handle even from areas that are flat and non-controversial logging areas. Please address the necessity, given the above and environmental impacts of allowing cable logging on steep slopes.
- **Page 9, #7- The project proposes various standards to determine how many snags to leave in areas where salvage logging is approved.** Bird and other wildlife habitat will be enhanced if high diversity is planned within each treatment unit. We believe that providing opportunities to return diversified forests to this area is critical for sustainable wildlife populations and connectivity of habitat for wildlife movement and expansion. Please address the environmental impacts of leaving some treatment units without high vegetative or snag diversity.

We look forward to reviewing the draft environmental impact statement for this proposal which will include responses to the above.

If you have any questions concerning our comments please submit them to the attention of our contact, Walt Kruse. He is our representative on the Yosemite Stanislaus Solutions Collaborative.

Sincerely,



David Harden, President

Central Sierra Audubon Society