UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105-3901

June 12, 2014

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

Subject: Draft Environmental Impact Statement for the Rim Fire Recovery Project, Stanislaus National Forest, California. (CEQ# 20140147)

Dear Ms. Skalski:

The U.S. Environmental Protection Agency has reviewed the Draft Environmental Impact Statement for the Rim Fire Recovery Project, Stanislaus National Forest, California. Our review is provided pursuant to the National Environmental Policy Act, Council on Environmental Quality regulations (40 CFR Parts 1500-1508), and our NEPA review authority under Section 309 of the Clean Air Act.

The Proposed Action would initiate the first step of recovery through the salvage of dead trees across more than 28 thousand acres of the Stanislaus National Forest, and would include 5.4 miles of new road construction, 13.2 miles of temporary roads, 319.9 miles of road reconstruction, and 216.1 miles of road maintenance deemed necessary for safe timber salvage operations. The document also proposes the use of both helicopter and tractor landings to facilitate timber removal. We appreciate that the project limits the number of landings within Protected Activity Centers for species of concern. We recommend that the FEIS include a closure and restoration plan for the proposed temporary roads and landings when the project is completed.

The EPA commends the Forest Service for limiting operations in areas containing species of concern such as spotted owls, goshawks, great gray owls, and bald eagles, in order to avoid direct adverse impacts to the species. While salvage of dead trees could destroy some potential habitat, we understand that the Forest Service anticipates that the vast amount of remaining unlogged charred and/or dead trees may be enough to sustain the surviving wildlife species dependent on post-fire environments. We recommend that the Final Environmental Impact Statement include the results of consultation with the United States Fish and Wildlife Service.

The project location contains potential areas of importance historically, culturally, and spiritually to local Tribes such as the Tuolumne Me-Wuk and Chicken Ranch Rancheria. We recognize that Tribal Consultation is an important component of the decision-making process associated with this project, and encourage the Forest Service to continue meaningful consultation, throughout the NEPA process, with all potentially affected tribal governments. We recommend that the results of consultations with tribal governments and with the Tribal Historic Preservation Office/State Historic Preservation Office be included in the FEIS.

EPA has rated the DEIS and all action alternatives as Lack of Objections—LO (see enclosed "Summary of Rating Definitions"). We support the best management practices and resource protection measures included in the project design. We recommend that the Final EIS incorporate the additional measures and information specified above.

Thank you for the opportunity to review this DEIS. We also appreciate the Forest Service's coordination with us prior to and during our review, via workshops, phone calls and a site visit. When the FEIS is released, please send one hard copy and one CD to the address above (mail code: ENF-4-2). If you have any questions, please contact me at (415) 972-3521, or have your staff contact James Munson, the lead reviewer for this project. James can be reached at (415) 972-3852 or Munson.James@epa.gov.

Sincerely,

Kathleen Martyn Goforth, Manager
Environmental Review Section

Enclosure: Summary of the EPA Rating System

SUMMARY OF EPA RATING DEFINITIONS*

This rating system was developed as a means to summarize the U.S. Environmental Protection Agency's (EPA) level of concern with a proposed action. The ratings are a combination of alphabetical categories for evaluation of the environmental impacts of the proposal and numerical categories for evaluation of the adequacy of the Environmental Impact Statement (EIS).

ENVIRONMENTAL IMPACT OF THE ACTION

"LO" (Lack of Objections)

The EPA review has not identified any potential environmental impacts requiring substantive changes to the proposal. The review may have disclosed opportunities for application of mitigation measures that could be accomplished with no more than minor changes to the proposal.

"EC" (Environmental Concerns)

The EPA review has identified environmental impacts that should be avoided in order to fully protect the environment. Corrective measures may require changes to the preferred alternative or application of mitigation measures that can reduce the environmental impact. EPA would like to work with the lead agency to reduce these impacts.

"EO" (Environmental Objections)

The EPA review has identified significant environmental impacts that should be avoided in order to provide adequate protection for the environment. Corrective measures may require substantial changes to the preferred alternative or consideration of some other project alternative (including the no action alternative or a new alternative). EPA intends to work with the lead agency to reduce these impacts.

"EU" (Environmentally Unsatisfactory)

The EPA review has identified adverse environmental impacts that are of sufficient magnitude that they are unsatisfactory from the standpoint of public health or welfare or environmental quality. EPA intends to work with the lead agency to reduce these impacts. If the potentially unsatisfactory impacts are not corrected at the final EIS stage, this proposal will be recommended for referral to the Council on Environmental Quality (CEQ).

ADEQUACY OF THE IMPACT STATEMENT

Category "1" (Adequate)

EPA believes the draft EIS adequately sets forth the environmental impact(s) of the preferred alternative and those of the alternatives reasonably available to the project or action. No further analysis or data collection is necessary, but the reviewer may suggest the addition of clarifying language or information.

Category "2" (Insufficient Information)

The draft EIS does not contain sufficient information for EPA to fully assess environmental impacts that should be avoided in order to fully protect the environment, or the EPA reviewer has identified new reasonably available alternatives that are within the spectrum of alternatives analyzed in the draft EIS, which could reduce the environmental impacts of the action. The identified additional information, data, analyses, or discussion should be included in the final EIS.

Category "3" (Inadequate)

EPA does not believe that the draft EIS adequately assesses potentially significant environmental impacts of the action, or the EPA reviewer has identified new, reasonably available alternatives that are outside of the spectrum of alternatives analyzed in the draft EIS, which should be analyzed in order to reduce the potentially significant environmental impacts. EPA believes that the identified additional information, data, analyses, or discussions are of such a magnitude that they should have full public review at a draft stage. EPA does not believe that the draft EIS is adequate for the purposes of the NEPA and/or Section 309 review, and thus should be formally revised and made available for public comment in a supplemental or revised draft EIS. On the basis of the potential significant impacts involved, this proposal could be a candidate for referral to the CEQ.

*From EPA Manual 1640, Policy and Procedures for the Review of Federal Actions Impacting the Environment.