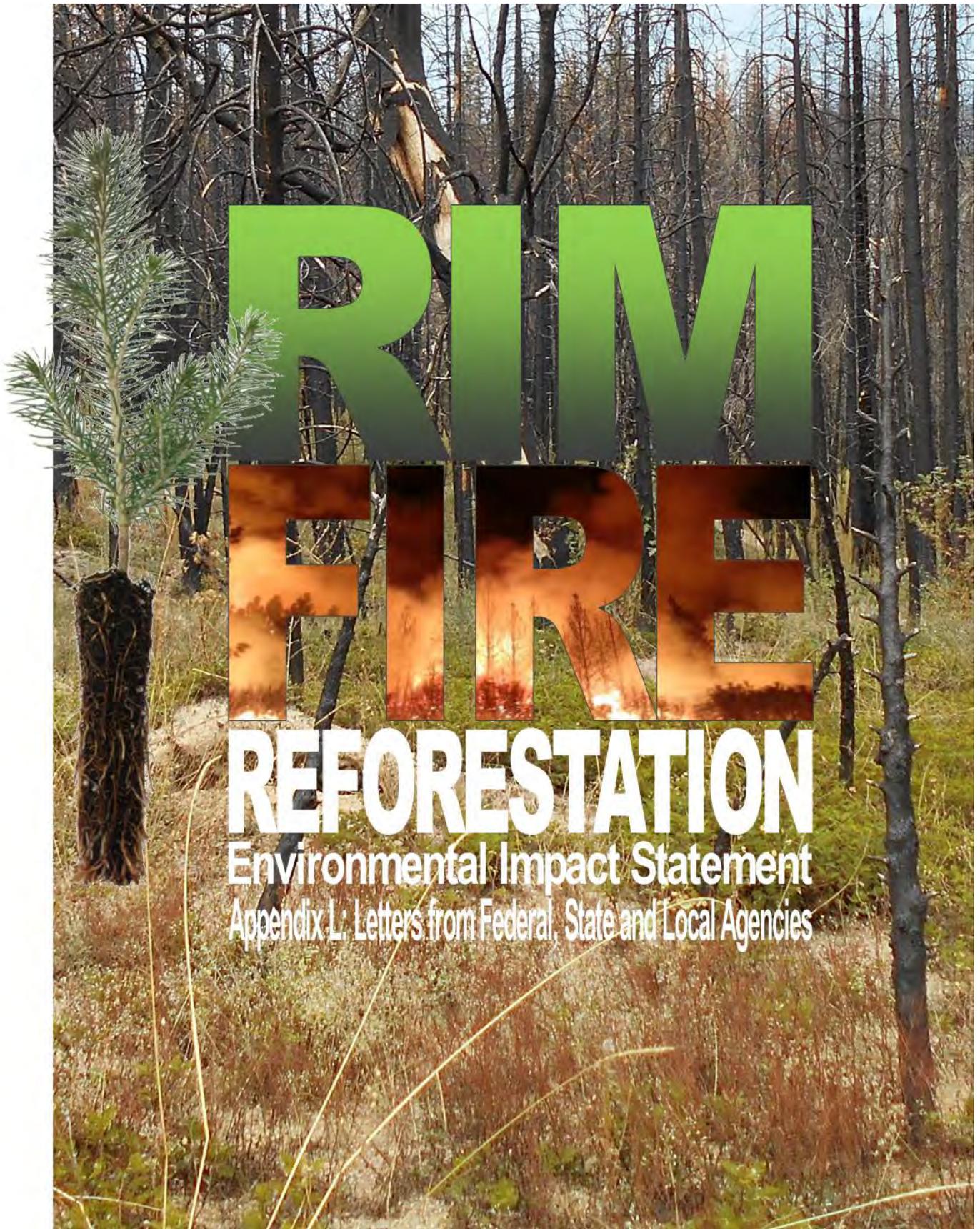




United States Department of Agriculture



Forest Service

Stanislaus National Forest

R5-MB-279

April 2016

L. Letters from Federal, State and Local Agencies

Table of Contents¹

(03) United States Department of Transportation, Federal Highway Administration	1
(08) Tuolumne County, Board of Supervisors	3
(09) United States Department of the Interior	7
(10) San Francisco Public Utilities Commission, Hetch Hetchy Regional Water System.....	11
(11) Mariposa County, Agricultural Commissioner.....	25
(26) State of California, Department of Fish and Wildlife	29
(28) United States Environmental Protection Agency	37
(34) Tuolumne Me-Wuk Tribal Council	43

¹ This Appendix includes letters submitted by Federal, State, and Local Agencies (including elected officials and the Tuolumne Me-Wuk Tribal Council) as comments on the Rim Fire Reforestation DEIS. The letters are listed by Respondent Number in the order they were received.

From: Larry.Vinzant@dot.gov
To: [FS-comments-pacificsouthwest-stanislaus](#)
Cc: Shawn.Oliver@dot.gov
Subject: Rim Reforestation
Date: Friday, December 04, 2015 3:15:12 PM

Thank you for the notification on the availability of the DEIS on the Rim Reforestation project in the Stanislaus National Forest.

The Federal Highway Administration has no action concerning this proposal and, therefore, has no comments on the document.

Tuolumne County
Administration Center
2 South Green Street
Sonora, California 95370



Alicia L. Jamar, *Chief Deputy
Clerk of the Board of Supervisors*

Telephone: (209) 533-5521
Facsimile: (209) 533-6549
www.tuolumnecounty.ca.gov

**BOARD OF SUPERVISORS
COUNTY OF TUOLUMNE**

Sherri Brennan, *First District*
John L. Gray, *Fourth District*

Randy Hanvelt, *Second District*

Evan Royce, *Third District*
Karl Rodefer, *Fifth District*

January 5, 2016

Via Email

jmhiggins@fs.fed.us

Jeanne Higgins, Forest Supervisor
Stanislaus National Forest
19777 Greenley Road
Sonora, CA 95370

Re: Rim Fire Reforestation Draft Environmental Impact Statement

Dear Supervisor Higgins:

The Tuolumne County Board of Supervisors is pleased to offer these comments on the Rim Fire Reforestation Draft Environmental Impact Statement (DEIS). As the third largest wildfire to date in California, the Rim Fire should serve as a reminder of ineffective past forestry practices. As you are aware, much of the Rim Fire burn area is a repeat of the 1987 Complex Fire whose post implementation management of recovery plans did not prevent the 2013 Rim Fire that exhibited extreme fire behavior with multiple flaming fronts.

Although the Rim Fire did not cause significant damage to residential structures and communities, it did destroy developed camps, forest infrastructure, livestock, and critical water and radio apparatus. In addition, a price tag cannot be placed on the loss in timber and watershed value. Furthermore, the livelihoods of entire communities were put on hold for weeks as schools closed, citizens evacuated, and businesses struggled to operate. It is essential for a robust reforestation plan to not only be adopted, but have the ongoing funding necessary to carry it out over decades to come.

Rather than select a single alternative from the five identified in the DEIS, the Board of Supervisors has the following concerns and recommendations:

1. Concerned with any alternative that replants a dense forest that is susceptible to catastrophic fire. The replanting of trees needs to include periodic thinning and controlled burns.

Jeanne Higgins, Forest Supervisor
January 5, 2016
Page 2

2. Concerned that the thinning plan (or any other portions of the plan) may not occur due to the lack of ongoing funding. Develop a funding plan that includes protected money set aside for specific purposes.
3. Brush management:
 - a. Use increased grazing as a management tool in addition to controlled burns.
 - b. Support the judicious use of herbicides.
 - c. Application of herbicides should be coordinated with grazing permittees.
4. Support the planting of a diverse forest to include blue oaks, black oaks, and gray pines. A diverse forest is more resilient to forest fires and is more visually appealing.
5. Support biomass removal rather than burning to the extent feasible.
6. Reinforce, establish, and maintain strategic fuel breaks in the Wildland Urban Interface such as Paper Cabin Ridge.
7. Use the DEIS implementation as an opportunity to perform controlled studies and experiments on reforestation. Use the lessons learned in other forest fire recovery efforts.

Tuolumne County expresses its desire to help promote appropriate reforestation efforts. And while initial implementation funding may be sufficient, the Board acknowledges the greater challenge to receive sustained funding for future thinning, controlled burns, and weed eradication. Ongoing funding is likely the greater determinant of establishing a beautiful, resilient, natural looking forest.

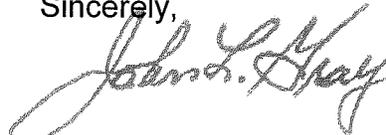
The 257,314 acre Rim Fire that primarily scarred the Tuolumne River Watershed should serve as a wake-up call that a change in current forest practices is needed now. Doing nothing will assure that massive swaths of forest will be consumed by flames each summer. Fire is part of the natural landscape, but the rate of catastrophic wildfire is increasingly troublesome, damaging forests and watersheds. The well-being of those who live in these foothill and forest areas is at risk as is the water which serves millions of residents from the San Francisco Bay area to Los Angeles.

The Tuolumne County Board of Supervisors is concerned that any delays in this DEIS process will further degrade reforestation efforts due to the increasing difficulty to plant trees amidst the encroaching brushfields. Time is of the essence. It is critical that this reforestation DEIS build on the previous success of other Rim Fire related efforts such as the removal of hazardous trees and Rim Fire recovery plan. In addition, this Board strongly supports efforts to remove dead material left on the forest landscape.

Jeanne Higgins, Forest Supervisor
January 5, 2016
Page 3

This County looks to be a local partner to assure a successful outcome that future generations can be proud of and others can look to as a model for replication.

Sincerely,



John L. Gray
Chairman

I hereby certify that according to the provisions of Government Code Section 25103, delivery of this document has been made.

ALICIA L. JAMAR
Clerk of the Board

By: 

From: [Brown, Matthew](#)
To: [Benech, Maria -FS](#)
Cc: [Lisa Treichel](#); [Patricia Port](#)
Subject: ER 15/0657 No Comment Letter
Date: Thursday, January 07, 2016 1:22:01 PM
Attachments: [ER_15_0657_NoCommentLetter.pdf](#)

Hello all,

Please find attached the No Comment Letter for ER 15/0657, *Review of the Draft Environmental Impact Statement (DEIS) US Forest Service (USFS), Rim Fire Reforestation, Stanislaus National Forest, CA*

Thank you,
On behalf of Noelani Reyes
Regional Environmental Intern, Region IX

--

Matthew J. Brown
Regional Environmental Intern, Region IX
Office of Environmental Policy and Compliance
United States Department of the Interior
333 Bush St., Suite 515
San Francisco, CA 94104
matthew_brown@ios.doi.gov



United States Department of the Interior

OFFICE OF THE SECRETARY
Office of Environmental Policy and Compliance
Pacific Southwest Region
333 Bush Street, Suite 515
San Francisco, CA 94104

IN REPLY REFER TO:
(ER 15/0657)

Filed Electronically

8 January 2016

Attn: Maria Benech
Stanislaus National Forest All Units
19777 Greenley Road
Sonora, CA 95370

mbenech@fs.fed.us

Subject: Review of the Draft Environmental Impact Statement (DEIS) US Forest Service (USFS), Rim Fire Reforestation, Stanislaus National Forest, CA

Dear Ms. Maria Benech,

The Department of the Interior has received and reviewed the subject document and has no comments to offer.

Thank you for the opportunity to review this project.

Sincerely,

Patricia Sanderson Port
Regional Environmental Officer

cc:

OEPC Staff Contact: Lisa Chetnik Treichel, (202) 208-7116; Lisa_Treichel@ios.doi.gov

From: [Ramirez, Tim](#)
To: [FS-comments-pacificsouthwest-stanislaus](#)
Cc: [DeGraca, Andrew](#); [Boozarpour, Manouchehr](#); [Clark, Robert L](#); [Fujita, Neal](#); [Francis, Thomas](#); [Frantz, Mae](#); [Hannaford, Margaret A](#); [Lehr, Daniel](#); [Williams, Mike](#); mvroman@sfwater.org; [Moccasin Records](#)
Subject: Rim Fire Reforestation DEIS - SFPUC comments
Date: Thursday, January 07, 2016 3:26:22 PM
Attachments: [image001.png](#)
[SFPUC USFS Rim Fire Reforestation DEIS comments final January 2016.pdf](#)

Attached.

Thank you.

TR

Tim Ramirez
Natural Resources and Lands Management Division Manager
Water Enterprise
525 Golden Gate Avenue, 10th Floor
San Francisco, CA 94102
office: (415) 554-3265 | fax: (415) 934-5770

Please consider the environment before printing this email.

Hetch Hetchy Regional Water System
Operated by San Francisco Water, Power and Sewer | Services of the San Francisco Public
Utilities Commission





San Francisco
Water Power Sewer
Operator of the Hetch Hetchy Regional Water System

525 Golden Gate Avenue, 10th Floor
San Francisco, CA 94102

Natural Resources and Lands Management Division

January 6, 2016

Maria Benech, Team Leader
Stanislaus National Forest
19777 Greenley Road
Sonora, CA 95370

RE: Rim Fire Reforestation Draft Environmental Impact Statement (45612)

The San Francisco Public Utilities Commission (SFPUC) appreciates the opportunity to comment on the Rim Fire Reforestation Draft Environmental Impact Statement (DEIS).

The SFPUC operates the Hetch Hetchy Project, partially located within the United States Forest Service (USFS), Stanislaus National Forest (STF). The Hetch Hetchy Project is a critical part of the SFPUC's Hetch Hetchy Regional Water System, which provides high quality drinking water to about 2.6 million people in the Bay Area and clean hydroelectric power to San Francisco municipal departments. The SFPUC also maintains rights-of way and infrastructure (e.g., roads, culverts, and electrical transmission and distribution lines) within STF.

The Rim Fire burned SFPUC infrastructure and Tuolumne River watersheds within STF, including portions of the Cherry Lake Watershed, Cherry Creek Sub-Watershed, and the Tuolumne River Sub-Watershed (see Attachment, Maps 1 and 2). The State Water Resources Control Board approved these watersheds as a drinking water source for SFPUC customers. The SFPUC is concerned with any fire effects or recovery actions that could impact water quality or SFPUC infrastructure in these watersheds.

The SFPUC provided scoping comments dated April 9, 2015. The following comments are based on reviewing the DEIS, maps, and field surveys.

1.03 PURPOSE AND NEED

The SFPUC generally supports all the proposed activities within the affected watersheds. This includes the creation of a fire resilient, healthy and diverse mixed conifer forest. The SFPUC agrees that brush domination (DEIS, p.7; Figure 1.03-1, p.8) will inhibit the creation of the desired forest conditions. The SFPUC recommends that the USFS judiciously use all available tools (manual, mechanical, chemical) to control unwanted vegetation and achieve the stated desired future conditions and needs (DEIS, p.8-10).

Edwin M. Lee
Mayor

Francesca Vietor
President

Anson Moran
Vice President

Ann Moller Caen
Commissioner

Vince Courtney
Commissioner

Ike Kwon
Commissioner

Harlan L. Kelly, Jr.
General Manager



Rim Fire Reforestation Draft Environmental Impact Statement (45612)

1.04 PROPOSED ACTION

The SFPUC has no objections to the general proposed actions listed on page 12 although we **recommend a modified Alternative 5** rather than Alternative 1 (Proposed Action). Alternative 5 (with modifications that include portions of Alternative 1) reforests the most acres within the SFPUC watersheds (Attachment).

1.06 DECISION FRAMEWORK

The SFPUC believes that the negative environmental impacts of Alternative 2 (No Action), Alternative 3 (no herbicide), and Alternative 4 (fewer planted acres) would be greater than the effects of either Alternative 1 or Alternative 5.

Therefore, we are pleased that the USFS proposed treatment is an action alternative (Alternative 1); although **the SFPUC recommends a modified Alternative 5 that includes "Natural Regeneration" and "Prescribed Burning in Established Plantations."** We believe this better meets the "Purpose and Need" (Section 1.03) identified for this plan (see following comments). Alternative 5 reforests more acres, and the SFPUC encourages reforesting all (as many as possible) of the previously forested acres destroyed by the Rim Fire.

The SFPUC believes that properly implemented Best Management Practices (BMPs), Forest Plan Standards and Guidelines (DEIS, Section 2.03), and appropriate site-specific contract specifications will result in no significant negative environmental differences between Alternatives 1 and 5.

2. ALTERNATIVES

2.01 HOW THE ALTERNATIVES WERE DEVELOPED

Proposed Treatments with Adaptive Management (p.20)

Deer Habitat Enhancement (p.20)

The SFPUC supports managing conifers and oaks together in the plantations. Individual remnant oaks, single stemmed oaks, and individually selected oak aggregates may provide the desired resource characteristics without the requirement of favoring all oaks.

The SFPUC prefers the USFS Certified Silviculturist, as the lead within the Interdisciplinary Team, to determine site specific prescriptions for planting and thinning each deer habitat enhancement area. These site-specific prescriptions, rather than the prescriptive treatments presented in this section, could still be aimed at achieving the overall desired conditions described for deer management areas.

The complicated planting pattern described may result in too few surviving conifers to meet the stated goals. Conifer seedling survival may be compromised by planting fewer seedlings, allowing more competing vegetation to dominate the site, and encouraging heavy deer browsing that may kill or heavily damage conifer seedlings. The SFPUC recommends planting more uniformly, planting more acres as originally proposed during scoping (Alternative 5), and creating the ICO pattern during thinning.

Rim Fire Reforestation Draft Environmental Impact Statement (45612)

Requiring thinning to 30 feet from all established oaks may not be appropriate on a site specific basis. The SFPUC recommends stating an optimum number of individual and aggregated oaks (e.g., 5 per acre) and thinning conifers, based on future site-specific prescriptions, to assure an appropriate vegetative assemblage.

Natural Regeneration (p.21)

Using natural regeneration is logical and takes advantage of living desirable seed trees and existing conifer regeneration. SFPUC encourages follow-through (e.g., monitoring and adaptive management) with any needed reforestation after 5 years post fire (2018).

Noxious Weed Eradication (p.21)

Herbicides are an issue because water from SFPUC watersheds is approved for human consumption. The SFPUC assumes the only approved herbicides for use in this project are the ones listed in the DEIS, as follows:

Name	Common Name	Signal Word	Main Usage
Glyphosate	Roundup	Caution	Broad-spectrum and noxious weeds
Clopyralid	Lontrel	Caution	Thistles
Aminopyralid	Milestone	Caution	Broadleaf weeds and thistles
Clethodim	Cletodime, Select	Warning	Annual and perennial grasses

SFPUC appreciates the herbicide evaluations (e.g., DEIS, p.317-323, p.342-357, and p.529-543). The SFPUC had concerns with two herbicides during scoping: Clopyralid because it is associated with substantial reproductive problems and is "persistent" in soil; and Clethodim because it has a "Warning" signal word indicating a higher hazard rating than Glyphosate. The DEIS evaluations appear appropriate and the SFPUC does not necessarily oppose either herbicide as long as they are selectively and appropriately applied away from watercourses.

The SFPUC cannot locate in the DEIS any specified minimum herbicide buffers along watercourses. The SFPUC recommends stating that herbicide buffers along watercourses:

- Shall meet label requirements and any additional site specific restrictions imposed by a trained professional (e.g., California Pest Control Advisor, or USFS Certified Silviculturist with Interdisciplinary Team input).
- May vary depending (within label requirements) on site-specific conditions, such as a cut and dab application may be appropriate on blackberries immediately adjacent to and within the high water mark of various watercourses within the affected watersheds (see Attachment).

Reforestation (p.21-23)

The SFPUC generally supports site preparation, planting conifers, release, and prescribed burning.

The term "low site class" is not defined (DEIS, p.22), although within the context of the DEIS it appears to indicate "poor soils." To clarify site class determinations, the SFPUC recommends specifying the actual site class or other classification (e.g., Dunning Site

Rim Fire Reforestation Draft Environmental Impact Statement (45612)

Class V, Forest Survey Site Class 7, or grows conifers at less than 20 cubic feet per year).

STF identifies the release adaptive management trigger as when greater than 20 percent of the land is vegetated with grass or shrubs, but also uses the term “free to grow” (DEIS, p.22). The SFPUC recommends using consistent terms and/or defining “free to grow.”

The SFPUC does not object to appropriate herbicide use that is prescribed by a qualified professional, applied by qualified personnel, and meets all label, Federal and State requirements. It is unclear how the backpack sprayer application will be done. In the cultural resources environmental consequences section (DEIS, p.109-110), it says backpack sprayers for direct localized application but in the wildlife section (DEIS, p.348) it says “Glyphosate would be applied via backpack sprayer in a broadcast manner.” The SFPUC recommends the following regarding backpack sprayer herbicide applications:

- Broadcast spray throughout plantations (non-sensitive areas) as needed to control unwanted and competing vegetation. This allows for better tree survival and growth; reduced competing vegetation, even in desired gaps and mosaics; reduced fuel loading; and better meets the project’s stated purpose.
- Spot spray in sensitive areas (e.g., archaeological, sensitive plant, or specific noxious invasive plants).
- Clearly describe the criteria for various herbicide applications (e.g., broadcast, spot, cut and dab) and the techniques for applying the four different listed herbicides.

The SFPUC supports returning fire to the landscape, but it may not always be feasible or appropriate to conduct prescribed fire after 10 years of plantation establishment. After 10 years, young trees may not be adequately sized and distributed to survive flame lengths and intensities (DEIS p.114, 115 and Table 3.05-2). Assuming that desired flame lengths for the first plantation entry would be up to 3 feet, it is possible that over half of a young tree crown to be scorched and result in immediate and/or eventual tree mortality. The SFPUC recommends adding a desired pre and post-burn stand description to the 10 year time period.

Thin Existing Plantations

The SFPUC has no objections to managing the landscape to its USFS desired future condition using the “Individuals, Clumps, and Openings” (ICO) prescription. The SFPUC recommends implementing the ICO prescription after stand establishment and monitoring determines tree size, condition, and distribution. The ICO pattern can then be implemented during pre-commercial and commercial thinning.

Rim Fire Reforestation Draft Environmental Impact Statement (45612)

2.02 ALTERNATIVES CONSIDERED IN DETAIL

Alternative 1 (p.24)

This is the USFS proposed alternative. SFPUC comments remain the same as in section 2.01 with the following additions:

Reforestation (p.24-30)

- **Planting.** The different ICO initial planting patterns appear complex, may be difficult to achieve during field operations, and may preclude future thinning. The SFPUC recommends planting more uniformly and creating the ICO pattern during thinning, and planting more acres as originally proposed during scoping (Alternative 5).
- **Oak Buffers.** The SFPUC recommends limiting oaks and oak buffers during planting to 5 per acre as described (DEIS, p.26) rather than designating all oaks with buffers (DEIS, p.20).
- **Meadows.** The SFPUC supports limiting conifer encroachment into meadows, although the planting patterns after the first 25 feet of exclusion appear complicated. The SFPUC recommends creating the vegetative pattern during future thinning and not as an ICO planting pattern (Alternative 5).

Management Requirements (p.30)

1c. **Aquatic Species.** This limits herbicide applications to at least 50 feet from Eleanor Creek. This requirement may limit the ability to meet objectives stated for Noxious Invasive Weeds. Currently, Himalaya Blackberry exists in dense concentrations along Eleanor Creek and manual removal methods are not practical.

The SFPUC does not object to legal, safe, professional applications with appropriate herbicides near watercourses. Yosemite National Park (YNP) applies glyphosate, with SFPUC coordination and consultation, on vegetation along watercourses within the YNP affected watersheds. Mitigations include directly applying concentrated glyphosate onto cut stems (e.g., blackberry) near and within watercourses. The SFPUC recommends an integrated pest management program that includes appropriate herbicides (e.g., glyphosate) applied near and within watercourses to better assure reforestation and control noxious invasive weeds.

5. **Soils (p.31).** This requires a vegetative buffer strip on slopes over 20% during contour subsoiling. It is unclear why this requirement is needed since it excludes more areas from reforestation. Also, no significant erosion has occurred in nearby privately owned subsoiled lands. The SFPUC recommends this requirement to mitigate potential erosion on a site-specific basis rather than for all areas over 20% slope.

Alternatives 2 (p.32), 3 (p.32 -34) and 4 (p.35-36)

The SFPUC does not support the "No Action" Alternative 2. The SFPUC prefers forested areas damaged by the Rim Fire to be restored into forested conditions as described in the desired future condition.

The SFPUC does not support Alternative 3. Without herbicide use, increased conifer seedling mortality will occur and surviving seedlings will have reduced growth. Along with reduced reforested areas, fewer invasive plants can be treated. The lack of

Rim Fire Reforestation Draft Environmental Impact Statement (45612)

herbicides significantly reduces treated acres and does not meet the USFS stated goals and objectives.

The SFPUC does not support Alternative 4 with its significantly few treated acres (e.g., thousands of acres would remain unplanted).

Alternative 5 (p.37-38)

We appreciate that Alternative 5 includes many of the recommendations from SFPUC's April 9, 2015 scoping letter. SFPUC comments remain the same as stated in Section 2.01 and in Alternative 1 sub topics unless noted otherwise. Alternative 5 as proposed and with further modifications, best meets the stated goals and objectives. ***The SFPUC recommends Alternative 5 with the inclusion of the following modifications:***

Natural Regeneration (p.37) and Reforestation (p.37-38)

It is financially and ecologically sound to allow natural existing conifer regeneration to survive and grow. Units M012, Y009, Y019, Y022, and Y027 are the only Natural Regeneration units within the affected watersheds (see Attachment). The SFPUC understands the concept of a 5-year monitoring period before site preparation and planting and recommends including "Natural Regeneration" into Alternative 5.

The SFPUC recommends including prescribed fire in established plantations after plantation trees reach conditions that will allow tolerance to flame lengths. This may be a shorter or longer time period than 10 years depending on various factors (e.g., site class, tree species, competing vegetation, etc.). The SFPUC recommends adding a desired pre and post-burn stand description to the 10 year time period.

Soils (p.38)

SFPUC has the same general comments regarding soils as in Alternative 1. The increased slope of 35% for deep tilling in Alternative 5 will help increase the amount of reforested acres and has only a slightly elevated risk of erosion in comparison to Alternative 1 (DEIS p. 208-209).

2.03 MANAGEMENT REQUIREMENTS (P.39-47)

29. Reforestation (p.44).

The SFPUC appreciates the requirement not to plant within 100 feet of powerlines. Please include these additional requirements specific to reforestation along SFPUC right-of-ways (ROWS):

1. Follow CAL OSHA guidelines for working with boom type equipment (e.g., excavator).
2. No slash piling within the wire zone on the transmission ROW and/or 50 feet of the centerline on the distribution ROW.
3. No mechanical site preparation within 25 feet of guy wires.
4. Contact the Hetch Hetchy Water and Power (HHWP) Right-of-Way Manager in Moccasin when planting near HHWP right-of-ways.

Rim Fire Reforestation Draft Environmental Impact Statement (45612)

3.15 WATERSHED

Based on Table 3.15-2 and Figure 3.15-1 the affected watersheds (see Attachment) lie partially within the following HUC (Hydrological Unit Code) watersheds:

Watersheds	HUC 6	HUC 7	Comments regarding affected watersheds
Cherry Lake	Upper Cherry Creek Lower Cherry Creek		Areas near Cherry Lake are affected.
Lake Eleanor	Miguel Creek- Eleanor Creek		Not affected by USFS reforestation.
Cherry Creek Subwatershed	Lower Cherry Creek		Entire subwatersheds within USFS lands are potentially affected.
Tuolumne River Subwatershed	Poopenaut Valley- Tuolumne River		
Other		Granite Creek	Outside SFPUC watersheds. Exceeds the Threshold of Concern (TOC, Table 3.15-7).

The SFPUC investigated Rim Fire impacts and basically agrees with the USFS watershed evaluation, especially the first paragraph on page 311. Most SFPUC observed soil movement resulted from rill and sheet erosion. This is being naturally mitigated by vegetative regrowth, although the SFPUC prefers reforestation with a managed forest for long term erosion control. Much of the rill and sheet erosion remains in ephemeral watercourses and may re-suspend during heavy precipitation, as will deposited sedimentation on the bottom of the perennial watercourses.

Granite Creek is outside the affected watersheds but may impact the Holm Powerhouse and roads maintained by HHWP. Granite Creek is the only affected area that exceeds the Threshold of Concern (TOC, Table 3.15-7). The SFPUC appreciates post Rim Fire watershed mitigations, has no concerns with proposed DEIS actions that follow BMPs and management requirements (DEIS, p.327), and encourages required monitoring (DEIS, p.324).

The SFPUC appreciates the herbicide evaluation (DEIS, p.317-322) and has no further herbicide related comments. Please notify the SFPUC watershed forester in Moccasin before applying herbicides (quantity, chemical, and location) within the affected watersheds (see Attachment).

The watershed analysis indicates Alternatives 1 and 5 are similar for direct and indirect effects and cumulative effects (DEIS, p.335-336). This supports the SFPUC recommendation to select Alternative 5 as modified.

Rim Fire Reforestation Draft Environmental Impact Statement (45612)

PROPOSED TREATMENT MAP – ALTERNATIVES 1, 3, and 5

Map review (refer to April 9, 2015 scoping input maps showing approximate watershed boundaries) indicates the following proposed activities within the affected watersheds:

Watershed	Proposed Units General Location
<p>Cherry Lake Watershed</p>	<p>West Side of Cherry Lake</p> <p>Thin: A007, A009, M001A, M001B, M001F, M002, M004A, M007, M008, M009A, M010A, M010C, M011B, M011C, M013, and M015.</p> <p>Reforest: M001C, M001D, M001E, M001G, M004B, M009B, M010B, M010D, M010E, M011A, and M012.</p> <p>East Side of Cherry Lake</p> <p>Thin: N009, N010A (portion)</p>
<p>Cherry Creek Subwatershed</p>	<p>Thin: N010A (portion), N014, P002, P003</p> <p>Reforest: N010B, N019, P014 (portion)</p>
<p>Tuolumne River Subwatershed</p>	<p>Thin: Y024, Y025, Y026, Y027</p> <p>Reforest: Y008, Y009, Y018, Y019, Y020, Y022, X003, Y026, X036 (portion), X037, X038</p>

The SFPUC recommends the following for vegetation treatment units:

1. Cherry Lake Watershed. The SFPUC is pleased that units originally proposed in the scoping package have been further stratified into thinning and reforestation units. SFPUC continues to recommend reforesting as much of the area as possible, especially areas with moderate/high burn severity and have numerous dead trees. This includes areas not currently shown as units in Sections 17 and 18 west of Cherry Lake.
2. Cherry Creek Subwatershed. Reforest the area east of Units N010A and N010B. Reforest the area southeast of Unit N019 in the Wilson Loop area (Road 1N97). Before the Rim Fire, vegetation on YNP was dense brush and the USFS plantations had vigorous growing plantation trees with an open grass understory. Subsoiling before planting will help mitigate the existing sheet and rill erosion into Eleanor Creek and help mitigate some of the concerns documented for the Wilson Loop area in the Rim Fire Rehabilitation (45861) Proposed Action.
3. Tuolumne River Subwatershed. Manage the area north and west of Mather to reduce fire, insect, and disease threats from spreading onto SFPUC managed

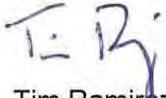
Rim Fire Reforestation Draft Environmental Impact Statement (45612)

property. The SFPUC has concerns with dead large timber near Mather and the lack of harvesting and reforestation.

In general, the SFPUC continues to recommend that reforestation occurs throughout the affected watersheds.

Thank you for this opportunity to comment. We look forward to further involvement and discussion with the STF staff on Rim Fire Recovery projects.

Sincerely,



Tim Ramirez
Natural Resources and Lands Management
Division Manager
Water Enterprise

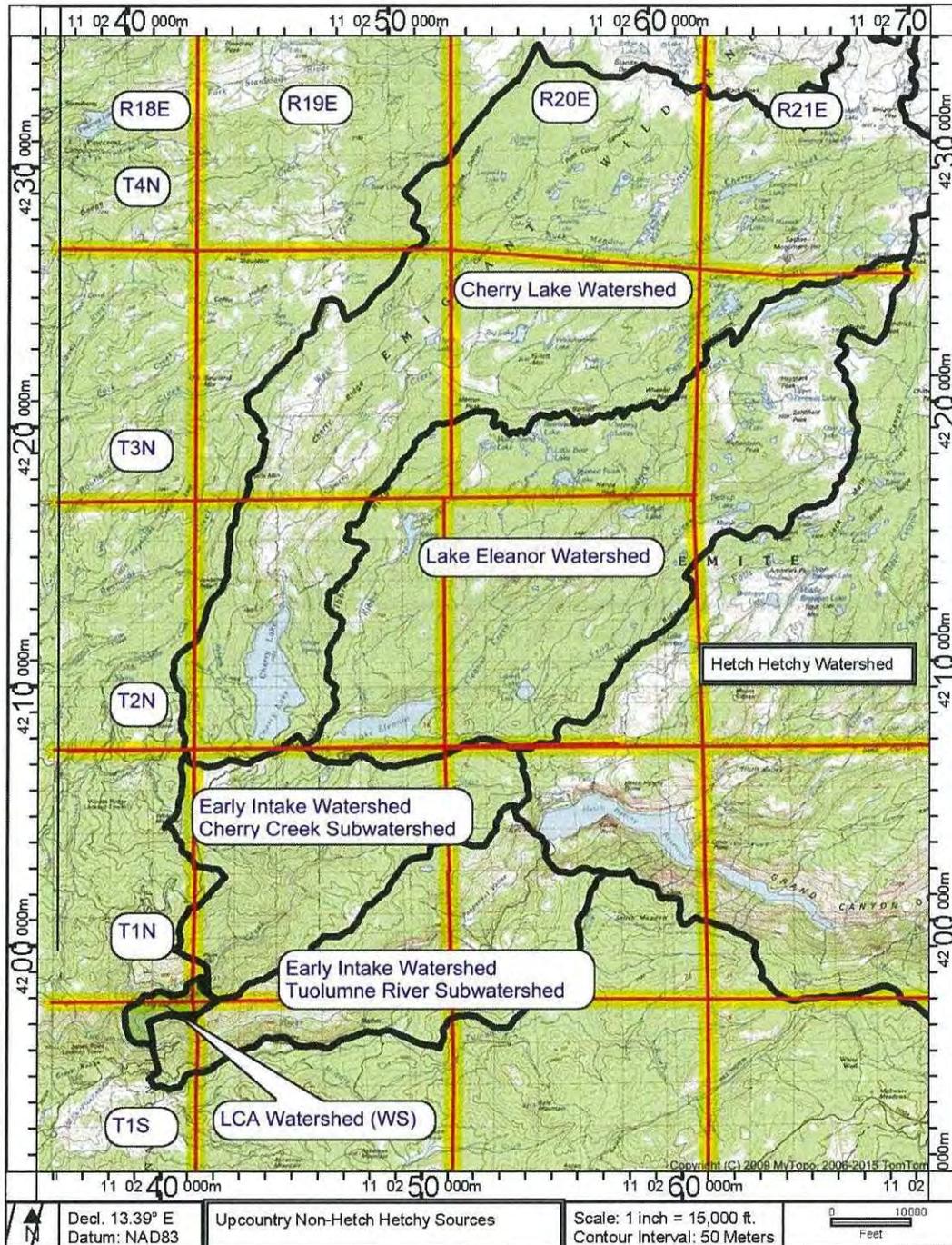
cc: Andrew DeGraca, Water Quality
Manouchehr Boozarpour, Water Quality
Rob Clark, Water Quality
Neal Fujita, Natural Resources and Lands Management
Tom Francis, Natural Resources and Lands Management
Mae Frantz, Natural Resources and Lands Management
Margaret Hannaford, Hetch Hetchy Water and Power
Dan Lehr, Hetch Hetchy Water and Power
Mike Williams, Hetch Hetchy Water and Power
Mike Vroman, Hetch Hetchy Water and Power
Moccasin Records

Rim Fire Reforestation Draft Environmental Impact Statement (45612)

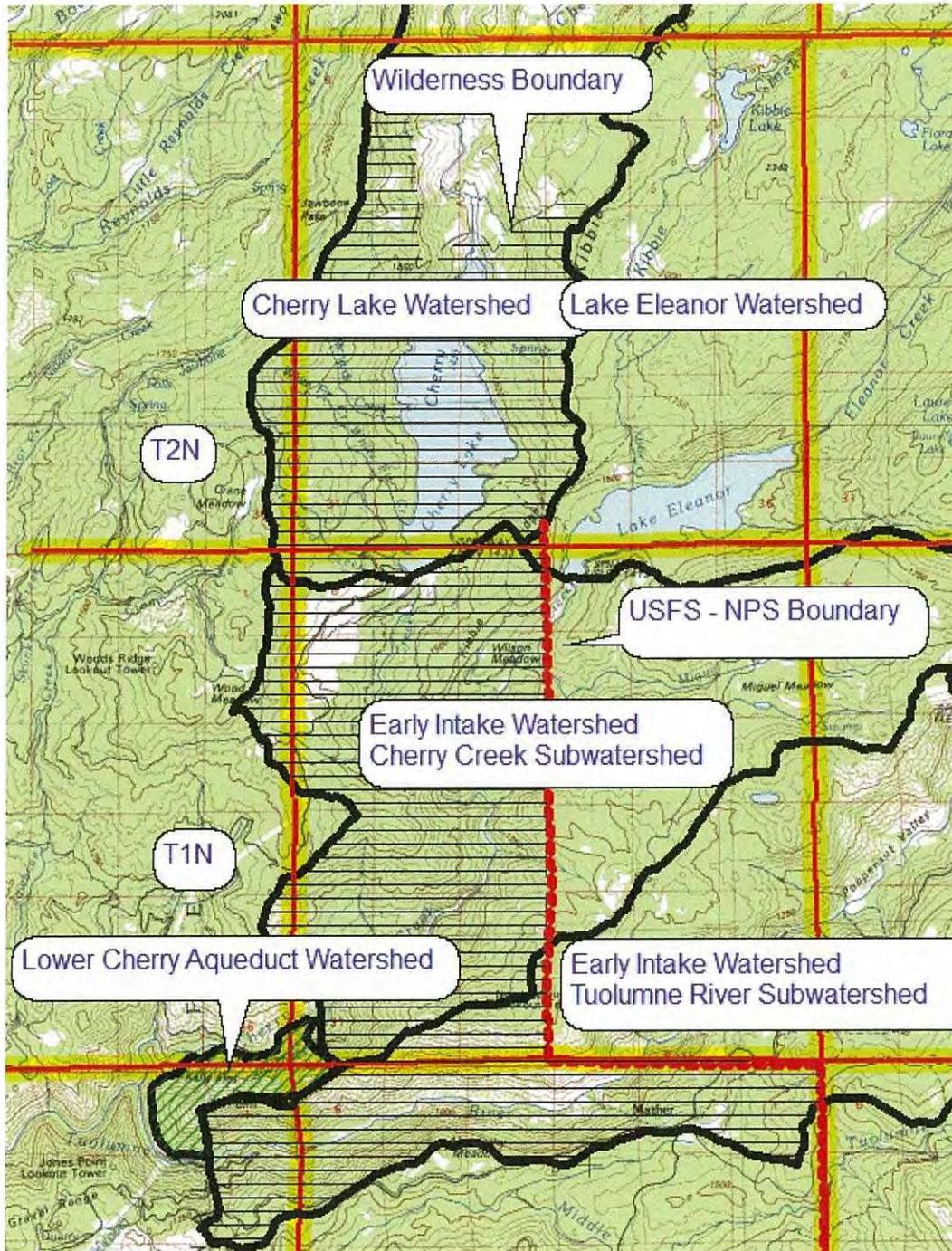
ATTACHMENT

WATERSHED BOUNDARIES

(i.e., affected watersheds, including Lower Cherry Aqueduct [LCA] Watershed)



Rim Fire Reforestation Draft Environmental Impact Statement (45612)



Map 2
Shaded Areas Can Be Potentially Affected by USFS Reforestation

From: [Cathi Boze](#)
To: [FS-comments-pacificsouthwest-stanislaus](#)
Cc: [Merlin Jones](#); [Marshall Long](#); [Rosemarie Smallcombe](#); jcarrier@mariposacounty.org; [Kevin Cann](#); [Mary Hodson](#)
Subject: Rim Reforestation
Date: Thursday, January 07, 2016 3:57:07 PM
Attachments: [image001.png](#)
[Rim Fire Reforestation \(45612\) DEIS Comments.pdf](#)

Maria:

Attached are my comments on the Rim Fire Reforestation (45612) DEIS. I'm really glad that various forms of invasive noxious weed control, including herbicides, are included in Alternative 1 (Proposed Action) as well as Alternative 5. Mariposa County has a long history of fighting invasive weed species, particularly in the leading edge areas of the county adjacent to the USFS lands. We have had a good working relationship with the Stanislaus NF for many years, particularly with Jennie Haas on several projects including Monotti.

Wishing you a belated Happy New Year!

Cathi

Cathi Boze
Mariposa County Agricultural Commissioner / Sealer
(209) 966-2075



"A weed (or two!) a day, that's all I ask!"

Life is what happens to you while you're busy making other plans - John Lennon

It is never too late to be what you might have been - George Eliot

"Whenever you find yourself on the side of the majority, it is time to pause and reflect." - Mark Twain

**MARIPOSA COUNTY DEPARTMENT OF AGRICULTURE
& WEIGHTS AND MEASURES**
OFFICE OF AGRICULTURAL COMMISSIONER/SEALER
Post Office Box 905, 5009 Fairgrounds Road
Mariposa, California 95338-0905

7 January 2016

Stanislaus National Forest
Attn: Rim Fire Reforestation (45612) DEIS
19777 Greenley Road
Sonora, California 95370

I am writing in regard to the ***Rim Fire Reforestation (45612) Draft Environmental Impact Statement for the Stanislaus National Forest*** in support of Alternative 1 (Proposed Action). I have reviewed the DEIS and would like to commend the Stanislaus National Forest for utilizing a comprehensive approach to address the serious threat that introduced invasive noxious weeds pose not only to USFS lands, but also to other public and private lands in California.

I feel that our public lands are part of the State's critical infrastructure that we need to preserve and protect at all costs. We need a comprehensive aggressive approach to address these invasive weed species using all available means and reverse their current spread and impact. Otherwise there is a very real possibility that the forest will continue to provide an avenue for the proliferation of invasive noxious weeds, not only in the areas where they currently exist, but also into new areas of the forest and onto adjacent private lands as well as public right-of-ways outside the forest boundaries.

The use of adaptive management in the project promotes flexible decision making to allow program adjustments in the face of uncertainties and ecosystem variability. It also enables the Stanislaus National Forest to respond rapidly to any new challenges encountered during the Rim Fire Reforestation project and to apply new tools and methods as needed from the fall of 2016 and continuing for the life of the project. I feel that employing a broad spectrum of integrated weed management techniques and a sustainable approach to managing invasive noxious weed species that minimizes economic, environmental, and health risks by combining physical, mechanical, cultural, and chemical (herbicide) control will protect both the native plant communities and the wildlife which are negatively impacted by invasive plant species. The impacts of the invasive noxious weed control and eradication contained in Alternative 1 (Proposed Action) are also beneficial to rangeland vegetation and likely to create a more desirable species composition, improve forage quantity and quality, vegetation condition, and ecosystem function. For these reasons, I support Alternative 1 (Proposed Action) which utilizes an Integrated Pest Management (IPM) approach for weed eradication which includes burning, targeted grazing, grubbing, and hand pulling in addition to the use of herbicides.

The use of herbicides has proven to be an important component of an effective, economical, and efficient integrated weed management program. The proposed herbicides for use on the project under Alternative 1 are Glyphosate, Clopyralid, Aminopyralid, and Clethodim for invasive noxious weed eradication, vegetation management, and reforestation. I note that both Himalayan (*Rubus discolor*) and cut-leaf (*Rubus laciniatus*) blackberry are scattered throughout the burned area of the Rim Fire Reforestation project, including Mariposa County. While these

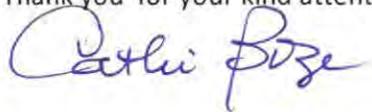
are not high priority target species, their control on some of the infested sites within the project area may be ecologically necessary. For that reason, I would suggest that Triclopyr be included in your list of proposed herbicides for woody plant control if at all possible. This herbicide has been used successfully on other projects within the Stanislaus National Forest – Groveland Ranger District such as on the Monotti Project.

While the majority of the 4,963 acres of invasive weed species (12,174.66 acres when including known invasive noxious weed species populations) in the Rim Fire Reforestation project are located in Tuolumne County, there are still approximately 281 acres of invasive weed species in Mariposa County. Of those 281 acres, approximately 279 acres are infested with yellow starthistle (*Centaurea solstitialis*) and tocalote (*Centaurea melitensis*). Since 2001, Mariposa County has been working on the control of invasive noxious weeds in the county with both our public and private stakeholders and has initiated a county funded cost share weed control program to control invasive noxious weeds such as yellow star thistle and tocalote on private lands within the county. For this reason, I am particularly concerned about the control of these two invasive noxious weed species during the Rim Fire Reforestation project and hope that they are included in the 5,555.75 acres of invasive noxious weeds to be treated under Alternative 1 (Proposed Action). In addition, a small area (0.947 acres) of medusahead (*Elymus caput-medusae*) has been identified within the Rim Fire Reforestation project area in Mariposa County. With such a small area on the Stanislaus National Forest, I would encourage you to aggressively attack and eradicate this species under Alternative 1 (Proposed Action).

The goals for the ***Rim Fire Reforestation (45612) Draft Environmental Impact Statement for the Stanislaus National Forest*** Alternative 1 (Proposed Action) as well as the proposed steps for implementation and treatment of invasive noxious weed species are in concert with those of our public and private stakeholders throughout California engaged in the management and control of invasive noxious weeds. These and other efforts demonstrate both the opportunity for success and the need for consistent efforts in reducing the size and density of invasive plant infestations, whether existing or introduced due to wild fires. They also highlight the importance of treating infestations before they become extensive.

I look forward to working with the Forest Service in a concerted effort to coordinate our resources in combating invasive species. Increasing both our collaboration and communication is essential to achieving our mutual objectives and generating the resources required to minimize the destructiveness of invasive species. I appreciate your coordinated approach to the management of invasive noxious weed species in the DEIS, particularly with regard to Alternative 1 (Proposed Action), in order to limit re-infestations and new infestations, particularly in the leading edge areas of Mariposa County. In addition, I hope that this document will be used as a model for other forests within the state and that you and the administration of Region Five will aggressively defend this document when challenges are made.

Thank you for your kind attention.



Cathi Boze
Mariposa County Agricultural Commissioner

From: [Moua, Linda@Wildlife](mailto:Moua.Linda@Wildlife)
To: [FS-comments-pacificsouthwest-stanislaus](#); [Ramaley, John@CALFIRE](mailto:Ramaley,John@CALFIRE); [Beal, Brian@Wildlife](mailto:Beal,Brian@Wildlife); [Palmisano, Terry@Wildlife](mailto:Palmisano,Terry@Wildlife); [Gerstenberg, Greg@Wildlife](mailto:Gerstenberg,Greg@Wildlife); [Applebee, Daniel@Wildlife](mailto:Applebee,Daniel@Wildlife); [Graveline, Nathan@Wildlife](mailto:Graveline,Nathan@Wildlife); [Gordus, Margarita@Wildlife](mailto:Gordus,Margarita@Wildlife)
Subject: Stanislaus National Forest DEIS for Rim Fire Restoration
Date: Monday, January 11, 2016 4:20:33 PM
Attachments: [01-11-16_RimFireRestoration_DEIS.pdf](#)

Good afternoon,

Please see attached letter regarding Stanislaus National Forest DEIS for Rim Fire Restoration.

Thank you,

Linda Moua
Office Technician
Department of Fish and Wildlife
Central Region 4
1234 East Shaw Avenue
Fresno, CA 93710
559-243-4014 ext 216
Linda.Moua@Wildlife.ca.gov



State of California – Natural Resources Agency
DEPARTMENT OF FISH AND WILDLIFE
Central Region
1234 East Shaw Avenue
Fresno, California 93710
(559) 243-4005
www.wildlife.ca.gov

EDMUND G. BROWN JR., Governor
CHARLTON H. BONHAM, Director



January 11, 2016

Jeanne M. Higgins
Forest Supervisor
Stanislaus National Forest
Rim Reforestation
19777 Greenley Road
Sonora, California 95370
Comments-pacificsouthwest-stanislaus@fs.fed.us

**Subject: Stanislaus National Forest
Draft Environmental Impact Statement for Rim Fire Restoration
Federal Register Vol. 80, No. 228, November 27, 2015**

Dear Ms. Higgins,

The California Department of Fish and Wildlife (Department) has reviewed the draft Environmental Impact Statement (DEIS) for Rim Fire Reforestation (Project) and posted in the Federal Register; Vol. 80, No. 228 dated November 27, 2015, prepared by the United States Forest Service (USFS). On August 17, 2013, the Rim Fire ignited, and over several weeks, burned approximately 257,000 acres, making it the third largest wildfire in the history of the State of California. The Department had previously commented on the USFS Rim Fire Hazard Tree Removal Project and the Rim Fire Recovery Project. This DEIS considers the effects of the initial two projects as part of the existing condition in the cumulative effects analysis. The DEIS and the above mentioned Rim Fire projects are to aid the Stanislaus National Forest in achieving the specific goal of creating a fire resilient forest where fire is an integral part of the system and not a landscape altering force, as is described in the USFS Forest Plan as a long-term management goal. Proposed Project-related activities include: 3,833 acres of Deer Habitat Enhancement; 4,031 acres of Natural Regeneration; 5,915 acres of Noxious Weed Eradication; 21,300 acres of Reforestation; 12,769 acres of Thinning Existing Plantations.

Wildlife habitat within an area as large as the Rim Fire requires a diversified approach to retain and enhance the values needed to protect wildlife resources. Specific areas of species emphasis are desirable since the needs of some species are in direct conflict with the needs of other species. The amount and type of restoration along with timing of the implementation, short-term and long-term, all play a role in the positive or negative effect restoration efforts will have on wildlife resources. For a Project as large as that which is proposed, it is impossible to prepare comments that would adequately

Jeanne M. Higgins
January 11, 2016
Page 2

address the wildlife needs for every species for each restoration area. In general, the Department supports the proposal for restoration efforts in areas impacted by the Rim Fire. Although some areas are proposed for active restoration, natural regeneration will occur in other areas, which will provide habitat for species that benefit from undisturbed burned landscapes. The Department has concerns regarding wildlife habitat and specific species avoidance measures in relation to activities proposed in the Project description. Our comments follow.

Project Comments

Great Gray Owls (*Strix nebulosa*) (GGO): Studies have found that the majority of GGO nest sites are located within 600 feet of meadow edges (Winter 1980). Meadows, meadow complexes, and adjacent timber stands in the Project area may be highly suitable GGO foraging, roosting and nesting habitat. Maintaining and enhancing these areas in a condition that can support the foraging and roosting needs of GGO breeding pairs and in a condition that provides potential future nesting sites for expanding local populations is an important component of statewide GGO conservation. The Department recommends that restoration efforts within 600 feet from the meadow edge, around meadows or complexes of meadows totaling 10 acres or more, are limited to those necessary to enhance and maintain GGO habitat per Beck and Craig's 1991 Habitat Suitability Index model. The Department supports the USFS proposal of installing artificial nest structures, not as permanent solutions, but as temporary measures to maintain site occupancy until suitable natural nest sites become available again. Further, the Department recommends the retention of understory cover or low-hanging limbs since they can be used as climbing opportunities or cover from predators by fledging GGOs who might not be fully capable of flight.

The Department recommends the limited operating period (LOP) for GGO, of March 1 through August 15, be extended through September 30, which would encompass the time that young disperse from nest stands. Alternatively, the Department recommends that LOP be maintained until young have fledged, and that it is only lifted after a qualified biologist has determined that the birds have fledged and are no longer reliant upon the nest or parental care for survival.

Meadows: The Department supports the meadow restoration efforts proposed in the DEIS. Over time, some meadows had pine encroachment and were in the process of type conversion. There is currently an opportunity to maintain and enhance these meadows in a way that will result in long term habitat improvements. There are some meadows with a ring of small live trees around the meadow where the fire intensity was low and not sufficient to kill the encroaching trees. Discussions with USFS staff indicate that meadow delineation will be conducted visually. Given that the majority of meadows were previously encroached, it is possible that current vegetation and other visible cues may not represent the previous meadow footprint. The Department recommends a wider no-tree buffer be established around meadows, from 25 feet to 75 feet, as needed. This will allow for meadow expansion, and provide an opportunity where these meadows can be enlarged back to their original size.

Jeanne M. Higgins
January 11, 2016
Page 3

Deer Habitat Enhancement: Department personnel have been collaborating with the Stanislaus National Forest and additional stakeholders to establish management strategies that will best suit deer winter range habitat post-fire and during the Rim Fire Recovery process. The Department supports the proposed Deer Habitat Enhancement restoration work on approximately 3,833 acres. In addition to the deer restoration units proposed in the DEIS, the Department has identified additional areas of high winter use that are extremely important to deer. These areas include Drew and Jones Meadows and the Gravel Range. The Department recommends these areas be reviewed by the USFS to determine if these areas can be included in the deer habitat enhancement restoration efforts.

Between 2009 and the present, the Department has been conducting a deer research project within the footprint of the Rim Fire. Prior to 2013, the Department documented mortality during migration was high in areas that had burned and regrown into thick brush bands through migration routes. Predation mortality was minor adjacent to the brush bands in areas where brush was controlled or where no fire occurred. Providing a mosaic that allows brush for forage in some areas and maintaining hazard free migration areas is important in sustaining the deer population. Therefore, the Department supports herbicide brush treatment within the migration corridors in a way that will result in a habitat mosaic.

Wildlife Management

There will be wildlife impacts, and for this reason, the Department would like to recommend that some specific targeted wildlife management and mitigation be incorporated into the Project. Listed below are potential mitigation measures that the Department recommends be included in the Project, and mitigation measures the Department supports which have already been included in the DEIS.

- **Snags:** Snags are an important wildlife component and are listed in the Project with retention standards. The Department recommends the Project clarify that not all snags are equal in value to wildlife. In restoration units where salvage operations have or will occur, the Department recommends the USFS maintain an average snag density of no less than 10 snags per acre, emphasizing retention of snags >20" dbh, and that snags be retained in a mosaic fashion, rather than in uniform distribution.
- **Oaks:** The proposed planting buffers for oak trees are adequate for black oak and live oak, but inadequate for blue oaks. The Department recommends no plantings occur within blue oak stands. If plantings do occur, the Department recommends the buffer around individual trees and/or stands of trees be increased to a minimum of 50 feet.
- **Fire:** The Department supports introducing prescribed fire as a tool and as an integral part of forest management. The Department supports prescribed fires in plantations within the first 10 years, particularly in the Strategic Fire Management areas or others that would protect the upslope plantations from wildfire.

Jeanne M. Higgins
January 11, 2016
Page 4

- **Noxious weed abatement:** The Department supports and encourages all efforts to control noxious weeds. Noxious weed abatement efforts will enhance the native forbs, provide high quality deer forage, and reduce the potential for seed spread into adjacent treatment and restoration areas.

The Department appreciates the opportunity to provide comments on this Project. Depending upon any additional information or survey results related to this Project, the Department may have additional comments and recommendations regarding avoidance, minimization, and mitigation of Project impacts to habitat and special status species. If you have any questions on these issues, please contact Margarita Gordus, Staff Environmental Scientist, at 559-243-4014, extension 236, or by electronic mail at Margarita.Gordus@wildlife.ca.gov.

Sincerely,



Julie A. Vance
Regional Manager

cc: United States Fish and Wildlife Service
2800 Cottage Way, Suite W-2605
Sacramento, California 95825

California Regional Water Quality Control Board
Central Valley Region
1685 E Street
Fresno, California 93706

ec: Stanislaus National Forest
comments-pacificsouthwest-stanislaus@fs.fed.us

California Department of Forestry and Fire Protection
John Ramaley, Forest Practice Manager, John.Ramaley@fire.ca.gov

California Department of Fish and Wildlife
Brian Beal, Senior Environmental Scientist (Supervisor), CDFW
Terry Palmisano, Environmental Program Manager, CDFW
Greg Gerstenberg, Senior Environmental Scientist (Supervisor), CDFW
Daniel Applebee, Senior Environmental Scientist (Specialist), CDFW
Nathan Graveline, Environmental Scientist, CDFW
Margarita Gordus, Senior Environmental Scientist (Specialist), CDFW

Jeanne M. Higgins
January 11, 2016
Page 5

Literature Cited

Beck, T.W., and Craig, D.L. 1991. Habitat suitability index and management prescription for the great grey owl in California. U. S. Department of Agriculture, Forest Service.

From: [Munson, James](#)
To: [FS-comments-pacificsouthwest-stanislaus](#); [Benech, Maria -FS](#)
Subject: EPA Comments on Rim Fire Reforestation Project DEIS
Date: Monday, January 11, 2016 6:45:35 PM
Attachments: [EPA Comments on Rim Fire Reforestation Project DEIS.docx.pdf](#)

Hi Maria,

Nice talking to you today.

Per our conversation please find attached EPA's Comments on the DEIS for the Rim Fire Reforestation Project.

Hard copy to follow,

James M. Munson, CFM
Environmental Protection Specialist
Enforcement Division, NEPA Section
U.S. EPA, Region IX
75 Hawthorne Street ENF- 4-2
San Francisco, Ca 94105
(415) 972-3852, Fax: (415) 947-8026



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

January 11, 2016

Jeanne M. Higgins, Forest Supervisor
Stanislaus National Forest
Attn: Rim Reforestation
19777 Greenley Road
Sonora, CA 95370

Subject: Draft Environmental Impact Statement for the Rim Fire Reforestation Project,
Stanislaus National Forest, California. (CEQ# 20150334)

Dear Ms. Higgins:

The U.S. Environmental Protection Agency has reviewed the Draft Environmental Impact Statement for the Rim Fire Reforestation 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.

EPA has rated the Draft EIS 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/monitoring included in the project design. We offer the recommendations below for your consideration as you prepare the Final EIS.

EPA believes the Council on Environmental Quality's December 18, 2014 revised draft guidance for Federal agencies' consideration of GHG emissions and climate change impacts in NEPA outlines a reasonable approach, and we recommend that Forest Service use that draft guidance to help outline the framework for its analysis of these issues. Accordingly, we recommend the FEIS qualitatively describe relevant climate change impacts, and analyze reasonable alternatives and/or practicable mitigation measures to reduce project-related GHG emissions. Recognizing that climate impacts are not attributable to any single action, but are exacerbated by a series of smaller decisions, we do not recommend comparing GHG emissions from a proposed action to global emissions. As noted by the CEQ revised draft guidance, "[t]his approach does not reveal anything beyond the nature of the climate change challenge itself: [t]he fact that diverse individual sources of emissions each make relatively small additions to global atmospheric GHG concentrations that collectively have huge impact." Consider providing a frame of reference, such as an applicable Federal, state, tribal or local goal for GHG emission reductions, and discuss whether the emissions levels are consistent with such goals.

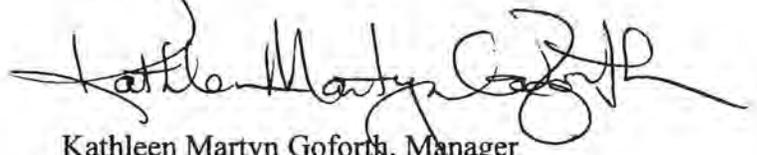
EPA suggests that the FEIS include a more systematic and comprehensive discussion of the impacts of climate change on the project area, and measures to improve the project's adaptability to climate change. For example, consider the increased vulnerability of specific species under a reasonably anticipated climate change scenario, and any projected shift of forest species to more suitable range elevations. We

recommend that the FEIS discuss measures to improve forest adaptation to climate change, such as the selection of certain species for replanting.

The project location contains potential areas of importance historically, culturally, and spiritually to local Tribes. 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.

Thank you for the opportunity to review this DEIS. 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,

A handwritten signature in black ink, appearing to read "Kathleen Martyn Goforth". The signature is fluid and cursive, with a large loop at the end.

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 analysed 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 analysed in the draft EIS, which should be analysed 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



TUOLUMNE ME-WUK TRIBAL COUNCIL

Post Office Box 699
TUOLUMNE, CALIFORNIA 95379
Telephone (209) 928-5300
Fax (209) 928-1677

28 January 2016

Jeanne Higgins, Supervisor
Stanislaus National Forest
19777 Greenley Road
Sonora, California 95370

RE: RIM FIRE REFORESTATION PROJECT No. 45612

Dear Supervisor Higgins,

The Tuolumne Band of Me-Wuk Indians is in support of Alternative 1 as the preferred alternative for the above referenced project. The Tribe believe that this alternative meets the overall purpose of creating a fire resilient mixed conifer forest that contributes to an ecologically healthy and resilient landscape rich in biodiversity. Also, this alternative has obtainable goals under the treatment proposals for deer habitat enhancements; natural regeneration; noxious weed eradication; reforestation; and thinning existing plantations.

The ID Team should be commended on the development of the proposed Rim Fire Reforestation Project as it clearly defines the purpose and need for multiple treatments, keeping in mind, the "goal" in obtaining the desired future condition of a healthy forest landscape.

The Tribe firmly believes that the "No Action Alternative" would be detrimental to forest health and would make it highly vulnerable for yet another catastrophic wild land fire event.

If you have any questions, please do not hesitate to contact me or Reba Fuller, Governmental Affairs Specialist.

Sincerely,

A handwritten signature in black ink, appearing to read "Kevin Day", written over a horizontal line.

Kevin Day, Tribal Chairman

