



July 17, 2018

Terrence O'Brien, Chair  
 And Members  
 Sierra Nevada Conservancy Board of Directors  
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Submitted for distribution to the Board via email to Board Liaison Tristyn Armstrong:  
[tristyn.armstrong@sierranevada.ca.gov](mailto:tristyn.armstrong@sierranevada.ca.gov)

**Re: Rim Fire area supplemental EIS issue**

Dear Chair O'Brien and Members of the Sierra Nevada Conservancy Board:

Thank you very much for the opportunity to speak to the Sierra Nevada Conservancy (SNC) Board at your June 6 meeting in Bishop regarding the current threats to ecologically important post-fire habitat on the Stanislaus National Forest in the Rim Fire area, west of Yosemite. We greatly appreciated the dialogue with SNC Board members. We understand that the issue is under consideration to be included on the agenda at the September meeting and we look forward to speaking with you again then.

In the meantime, we want to urge you to work with the U.S. Forest Service to ensure the preparation of a supplemental environmental impact statement (supplemental EIS) to fully

consider significant changed circumstances and new information regarding snag forest habitat on National Forest lands in the Rim Fire area. As was recently brought to your attention, current (2018) extensive field plot data indicate that there is now substantial natural post-fire conifer regeneration in the large patches of intact (unlogged) snag forest habitat that are included in the areas under consideration for management activities through the \$28 million grant from the Trump Administration. That grant was based on old (2014/2015) Forest Service field data and the outdated assumption that such areas have little or no regenerating forest.<sup>1</sup> The young, naturally regenerating forests in the Rim Fire area would be killed if planned, ground-based, biomass logging,<sup>2</sup> and related logging activities, of these snag forests proceeds.

While a supplemental EIS is being prepared, we urge you, in your role overseeing the grant, to ensure that no further cutting/felling of snag forest habitat occur on lands targeted by the grant in the Rim Fire area until the supplemental environmental impact statement process is completed, and alternative approaches can be fully contemplated, given the changed circumstances. We have identified alternatives to snag removal that could help restore the area. These alternatives include: (a) plant trees where previous, ground-based, post-fire logging in the Rim Fire area (generally occurring in 2014 and 2015) has already removed the snag forest habitat and hindered natural post-fire conifer regeneration; (b) repair public roads in the Rim Fire area that have been severely damaged by the heavy traffic from logging trucks when slopes were moist, and which are at risk of failing and washing sediment and asphalt into streams; (c) remove large “slash piles” left behind by logging companies (branches, tree tops, and small trees)), where they remain in some areas that were already heavily logged in the Rim Fire area; and (d) remove/eradicate invasive weeds, like cheatgrass, in areas that were heavily post-fire logged in 2014/2015, and which are now dominated by invasive weeds.

Hundreds of U.S. scientists have strongly opposed post-fire logging of snag forest habitat in the Rim Fire area and have noted that this unique post-fire habitat supports levels of native biodiversity and wildlife abundance comparable to old-growth forests.<sup>3</sup> We respectfully request that you ensure a pause on current activities until after the changed circumstances in the Rim Fire area can be meaningfully analyzed and addressed through the National Environmental Policy Act (NEPA) public participation process.

Again, we look forward to discussing these issues with you at your September meeting. If you would like a site visit together in the Rim Fire area, please let us know.

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<sup>1</sup> CBD, JMP, and Sierra Club California comments, June 6, 2018 and June 12, 2018, “Notice of New Information and Changed Circumstances; Need for Supplemental NEPA Analysis and CESA Analysis” ([http://johnmuirproject.org/wp-content/uploads/2018/07/FirstRimFireLetter6June2018\\_SNCBoardFinal.pdf](http://johnmuirproject.org/wp-content/uploads/2018/07/FirstRimFireLetter6June2018_SNCBoardFinal.pdf); [http://johnmuirproject.org/wp-content/uploads/2018/07/12Jun18RimFireLetter\\_SNCBoardFinal.pdf](http://johnmuirproject.org/wp-content/uploads/2018/07/12Jun18RimFireLetter_SNCBoardFinal.pdf)).

<sup>2</sup> Project documents indicate that much of the snag forest habitat would be cut, removed, and burned in biomass energy facilities to generate kilowatts, while other snag forest habitat areas might be felled and burned with accelerant in giant piles. These actions would emit large amounts of greenhouse gases, and would cause severe and prolonged soil scorching—neither of which was previously analyzed at the scale of what is currently proposed.

<sup>3</sup> Open Letter to Members of Congress from 250 Scientists Concerned about Post-fire Logging, October 30, 2013 (<http://johnmuirproject.org/wp-content/uploads/2015/04/ScientistSign-onLettertoCongressRePostfireLogging.pdf>); Letter from Scientists on Proposed Postfire Salvage on the Stanislaus National Forest, central Sierra Nevada region, California, January 3, 2014 (<http://johnmuirproject.org/wp-content/uploads/2015/04/RimFireScientistLetterToUSFS.pdf>).

Sincerely,



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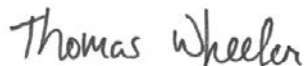
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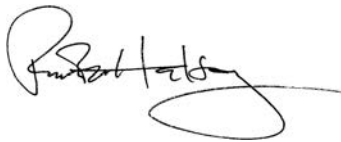
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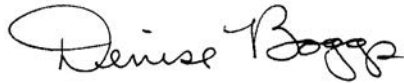


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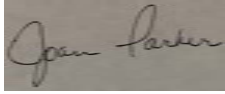
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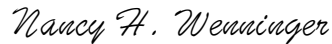
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