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January 24, 2022

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

Via Electronic Submission and USPS

Re: SERAL DEIS Comments

Dear SERAL Team,

CT Bioenergy Consulting is a local Tuolumne County forestry and bioenergy consulting firm and also a member of YSS. Through YSS, CT Bioenergy has been involved in helping the Stanislaus NF (STF) develop this project from Pre-Scoping through the DEIS. As I have read the DEIS and participated in the public meeting, I would like to present the following comments:

First, I appreciate the STF's efforts to systematically treat this large-scale landscape and return wildland conditions to a more natural resiliency, better able to withstand natural damage agents such as drought, wildfire, insects and disease and other environmental stressors while also enhancing wildlife habitat and watershed quality.

I strongly support the use of the Natural Range of Variation (NRV) in evaluating current stand conditions and the use of potential fire flame length in evaluating current forest resiliency to wildfire and proposed need for treatments. I agree that creating stand conditions closer to NRV will result in a forest that is more resilient to damage agents, and better able to survive under conditions of drought and wildfire.

I strongly support the treatments described in Alternative 1 aimed at reducing wildfire risk in the WUI Defense Zone (WDZ) since 73% of the WDZ is expected

to burn with High Severity. The adjacent communities north of Hwy 108 are at unacceptably High Risk of being destroyed by a wildfire that originates within the SERAL footprint.

I strongly support Alternative 1 because it maximizes acres of fuel treatment before reintroduction of prescribed fire whenever possible. I also support mandatory biomass removal in all timber sales and in other fuel reduction projects whenever possible. There are existing markets for these products and, in many cases, removal will facilitate the use of follow-up prescribed fire without the need for further pre-fire treatment.

I strongly support the creation of a system of strategic fuel breaks throughout the area to help keep wildfires small and to act as a boundary for follow-up prescribed fire treatments. I encourage the FS to remove unwanted sawtimber and biomass from these fuel breaks prior to mastication treatments to reduce residual fuel loading and to provide revenue to help pay for fuel break construction. I also encourage the FS to maximize sawtimber and biomass removal and minimize the amount of machine piling of fuels for later burning due to lack of FS staffing and limited burn windows.

I support the request for an ESD for the immediate construction of fuel breaks in the 5 highest risk PODs that are adjacent to the communities north of Hwy 108.

I strongly support the removal of sawtimber and otherwise unmerchantable biomass whenever possible to support local forest products businesses to help pay for the proposed treatments.

I support the immediate salvage of areas with insect, drought, and fire mortality in order to maximize value and allow for timely reforestation. I encourage the FS to remove all dead and dying hazard trees within 2 tree lengths of every public road in a timely manner to allow safe ingress/egress for the public, contractors, and FS staff.

I also support the proposed rapid salvage of up to 500 acres of fire-killed trees in each HUC-6 watershed.

I strongly support Alternative 1's proposed use of the Owl Conservation Strategy

in thinning of up to 100 of the most fire-prone acres in each PAC. I agree with conclusions from forest researchers that high severity wildfire is the #1 threat to the survival of the CA Spotted Owl.

I am aware of a couple of important community issues that the DEIS does not appear to address in sufficient detail:

1. Under Issue #4 page 69, it is clear that there are robust local and regional markets for logs generated from SERAL. However, there is no mention of the 2 local bioenergy facilities - Chinese Station and SPI Sonora both of whom are ready offtakers for the biomass removed in SERAL treatments. The DEIS needs to mention biomass utilization facilities that are currently under development such as the 44,000 BDT/year pellet facility in the Camage Industrial Park and the 300,000 tonne/year export wood pellet facility being developed by GSNR in Jamestown. There is also little to no analysis of the social and societal impacts of the 4 alternatives that should be covered in an EIS. This is unacceptable and must be included in the FEIS in order to sufficiently understand the impacts of each Alternative.

2. Maintaining the integrity of the Tuolumne Main Canal, which is located within the SERAL footprint, is of extremely high importance to the local community. Ninety-five percent of the water supply to the majority of the residents of Tuolumne County is conveyed through this canal which contains a number of historic wooden flumes roughly 16 miles in total length from Lyons Reservoir on the South Fork of the Stanislaus River to the Phoenix Forebay. The Tuolumne Main Canal water conveyance system serves as the only water supply delivery system to the communities along the Hwy 108 corridor. Recent reports list Tuolumne County as having the highest wildfire risk in California and remains a major threat to the Tuolumne Main Canal. We strongly encourage the STF to specifically address protection of this canal system as a high priority for SERAL treatments.

In Summary:

CT Bioenergy encourages the FS to choose Alternative 1 for the following reasons:

- Alternative 1 results in returning the most acres to NRV, which will help make the entire SERAL analysis area more resilient to the natural damage agents of drought, insects, disease, and high severity wildfire. A more resilient forest means that water quality, wildlife, soils, recreation, air quality, and private property values will be enhanced and protected.
- Alternative 1 results in the most improved habitat quality and fire hazard reduction within owl PACS
- Alternative 1 results in the creation of a large network of fuel breaks which can be used to minimize wildfire spreads when they start (and they most certainly will) and as a barrier for reintroduction of prescribed fire
- Alternative 1 maximizes the production of sawtimber and biomass for use in local and regional forest products operations which will result in enhanced forest-sector employment and flow of \$ to the local community.
- Alternative 1 results in the flexibility to quickly salvage drought and fire-killed timber in up to 500-acres per HUC-6 watershed while further NEPA analysis (if needed) is completed.
- CT Bioenergy encourages the FS to apply for an ESD that will facilitate immediate fuel break construction in the highest risk PODs immediately adjacent to the communities north of Hwy 108.

In addition, CT Bioenergy requests that the FEIS address the following:

- CT Bioenergy requests further analysis in the FEIS of the local and regional social and societal impacts of each Alternative, including the local and regional economy, and including listing existing biomass feedstock facilities and other biomass facilities under development.
- CT Bioenergy requests that the FEIS specifically commit to mandatory removal of biomass in all subsequent timber sales and emphasize the removal of usable biomass prior mastication treatments.

- CT Bioenergy requests that the FEIS specifically specify that there will be timely removal of hazard trees within 2 tree lengths of all public roads to allow safe ingress/egress for the public, contractors, and FS staff and before the dead trees lose their value in local sawmill markets4
- CT Bioenergy requests that the FEIS more specifically address the protection of the historic Tuolumne Main Canal and its wooden flumes which supplies drinking and sanitation water to 95% of the population of Tuolumne County. Protection of this system should be set as one of the highest priorities in the SERAL project.

Thank you for the opportunity to comment on this very important project.

Sincerely,

Chris Trott
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