



April 11, 2022

Jennifer Eberlien
Regional Forester
Attn: SERAL
1323 Club Drive
Vallejo, CA 94592

Submitted via: email

Re: Objection to SERAL Project

Dear Reviewing Officer:

The Center for Biological Diversity (name, address and telephone are listed in the signature) objects to the SERAL Project (Responsible Official, Jason Kuiken, Forest Supervisor, Stanislaus National Forest) for the reasons discussed below. Because the SERAL Project intends to rely on three separate decisions, this objection addresses the draft record of decision issued on February 25, 2022. We do not believe that that draft decision can adequately protect California spotted owls or other species that rely on the dense, old forest habitat that this Project proposes to harm across thousands of acres.

In previous comments, which we incorporate by reference, we asked that mechanical thinning be avoided or reduced in quantity and degree (e.g., with respect to dbh limits) to ensure species viability. The California spotted owl is in severe decline in the Sierra region and careful protection of its habitat is essential to halt its demise.

The SERAL Project draft decision does not make necessary changes. Instead, if approved, the draft decision will likely result in severe harm to California spotted owls. The draft decision generically assumes that by reducing fire severity through thinning the Project will protect spotted owls, but the draft decision fails to explain why the severe damage to owl habitat that will result will not preclude the owls' viability nor does the draft decision explain why the specific proposed thinning (which allows large trees to be logged rather than focusing on small trees) is essential to address the agency's concerns regarding fire.

California spotted owls rely on mature/old coniferous forests with dense canopy cover (generally greater than 70 percent), multi-layered canopies, and an abundance of medium and large trees as well as significant large snag basal area. Over the past two decades, under the direction of the 2004 Framework (and its 30 inch dbh limit), the spotted owl has undergone a massive decline in the Sierra region. Yet, despite that reality, rather than increase protections for owls, the SERAL draft decision would reduce them such as by allowing greater damage to the canopy cover, large trees, and even the PACs that the owls rely upon. These harmful changes are proposed despite the scientific literature demonstrating that the SERAL logging can significantly harm spotted

owls and despite the literature showing that thinning treatments that use a 12 inch dbh limit yield a similar result as those treatments with a 30 inch dbh.

Rather than a 12 inch dbh limit, the Project seeks to promote the logging of large trees even though the literature shows a dearth of large trees (>24 inches dbh) in the Sierra region—McIntyre et al. 2015 observed “[d]eclines of ~50% in large tree numbers . . . in the Sierra Nevada highlands . . .” It is not possible to protect or recover at-risk species like the spotted owl without protecting and recovering the many large trees they need.

Furthermore, not only does the draft decision reduce protections for a species that desperately needs greater protections, it does so without any required future monitoring to research and understand how owls are doing in the Project area during and after Project implementation. Without making approval of the Project contingent upon such monitoring, nothing will be learned and adaptive management will be impossible. Such monitoring must be long-term so as to ascertain how owls are impacted years from now, not just 1-3 years after an area is logged.

Sincerely,

A handwritten signature in black ink that reads "Justin Augustine". The signature is written in a cursive, flowing style.

Justin Augustine, Lead Objector
Center for Biological Diversity
1212 Broadway, Suite 800
Oakland, CA 94612
503-910-9214
jaugustine@biologicaldiversity.org