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Heather Ryan  
Senior Board Clerk of the  
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**BOARD OF SUPERVISORS  
COUNTY OF TUOLUMNE**

David Goldemberg, *First District*  
Kathleen K. Haff, *Fourth District*

Ryan Campbell, *Second District*

Daniel Anaiah Kirk, *Third District*  
Jaron E. Brandon, *Fifth District*

December 12th, 2023

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

To Whom It May Concern,

The County Board of Supervisors enthusiastically supports the SERAL 2.0 project and welcomes the opportunity to comment on the Scoping Document. Please consider the comments and recommendations as follows.

The County Board supports the utilization of the Emergency Action Determination, (EAD) for this Project. While it is important to conduct rigorous environmental review and well-designed treatments, the EAD is appropriate due to the emergent need and landscape conditions. It will facilitate quicker implementation. The unnatural conditions of the forest due to legacy neglect have created an imminent threat to the health and safety of mountain communities, critical infrastructure, and the local economy. Additionally, it threatens habitat biodiversity, ecosystem health, and related benefits. In many instances, achieving pace-and-scale of forest restoration is throttled by 'green tape' regulation. In this case, the Stanislaus Forest has demonstrated its ability to respond expeditiously to the critical status of Forest conditions.

The County of Tuolumne stands ready to support the meaningful work of this project and is able to add capacity to the Forest Service for immediate implementation in conjunction with the ongoing work already taking place in SERAL 1.0 through its Master Stewardship Agreement with the Stanislaus National Forest. We can leverage our existing resources and networks as well as increase internal and external capacity to ensure SERAL 2.0 is implemented at the urgent pace necessary to justify the EAD by greatly reducing wildfire fire hazard to our communities and watersheds.

The Board of Supervisors recommends the following in consideration of the Scoping Document:

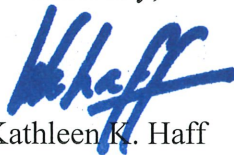
- We support the use of targeted grazing within the project. As noted in the Scoping Document, targeted grazing is a cost-effective means of fuel treatment maintenance. Recent advances in virtual fence technology hold promise to make this even more cost-effective and more granular in achieving vegetation goals while avoiding unintended damage. However, the scoping document indicates only sheep and goats will be used. By contrast, we recommend a strategy where the stock type is matched to the targeted vegetation density and the successional class of the treatment area. We recommend that the use of cattle should not be categorically excluded. Early treatment with goats and sheep is appropriate in most settings. Their self-selected forage type can be as high as 70% browse non-herbaceous leave and shoots). However, as the regrowth of woody perennial shrubs is controlled and a transition to mosaic stands of trees and grasslands is achieved, a corresponding transition in stock type should also be

implemented. In addition to the management of grasses, cattle are effective in trampling undesirable understory brush. The inclusion of cattle would also provide a meaningful pathway for local livestock producers to enter the targeted grazing market. We recommend that innovative local producers should be prioritized in consideration for targeted grazing contractors. Collaboration with existing grazing allotment leaseholders within the project area should also be considered. Lastly, we recommend that if early grazing treatments render desirable outcomes, then the total acres treated per year be increased accordingly.

- We would also like to comment on the treatment prescriptions and encourage the Forest to clarify how treatment prescriptions are developed and would encourage clarification of objectives and outcomes as much as possible in the development of the FEIS. That is to say, “when the treatment is completed, we want the forest to look like this...” Furthermore, once treatment outcomes are better defined, we would encourage Forest Staff to demonstrate examples of stated objectives to the public and stakeholders. The Supervisors specifically identify the need for diversity in tree species and succession development. In some settings, a flexible appropriation of stand density and tree diameter (DBH) thresholds for removal should be applied for optimal forest resilience. Specifically, we would like to see cutting prescriptions that leave more and larger open areas for natural regeneration of shade-intolerant species such as Ponderosa pine, sugar pine, and Douglas-fir. We would also like to see thinning prescriptions that include the removal of some of the larger size classes of trees and leaving well-spaced clumps of smaller trees and more of the medium-sized trees that would then be available for future harvests. We would like to see pine plantations thinned more heavily to make them more resilient to fire, drought, insects, and disease and release understory hardwoods and other naturally regenerated conifer species.
- We support the use of prescribed fire as an important nature-based fuel treatment. However, we recommend that planned prescribed fire treatment be sequenced only after heavy fuels have been removed by other means. Sequencing of fire primarily as a maintenance tool would lower fire intensity and decrease the likeliness of fire containment escapes and/or risk to trees that are not identified for removal.
- We acknowledge the importance of improving treatment methodology in response to monitoring efforts and emerging science. Multiple projects are proposed or underway that will identify the impact of forest treatment on water resources, the risk to build environments, and other benefits. We encourage the Forest’s engagement and iterative improvement of treatments in consideration of these studies as SERAL 2.0 is implemented.
- Lastly, the County Supervisors encourage a preemptive, innovative engagement to facilitate forest biomass product utilization. We understand that currently, there are approximately 50,000 piles staged for burning this winter. However, the burn window is becoming smaller with climate variation becoming more extreme. In some cases, this has resulted in dangerous fuel loads remaining on the landscape in high fire season. Facilitating local supply chain and capacity for bioenergy, construction products, or other uses should be prioritized whenever possible.

Thank you for your consideration of this letter. We applaud the ambitious SERAL 2.0 Project and look forward to continued partnership and the pace-and-scale of forest health and resilience the treatments will bring.

Sincerely,



Kathleen K. Haff  
Chair, County of Tuolumne Board of Supervisors

I hereby certify that according to the provisions of Government Code Section 26100, this document has been made.  
HEATHER D. RYAN  
Board Clerk

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

HEATHER D. RYAN  
Board Clerk

By: 

