



October 28, 2024

Jason Kuiken, Forest Supervisor
Stanislaus National Forest
19777 Greenley Road
Sonora, CA 95270

Regarding: Stanislaus National Forest Hazard Tree Management Project

Supervisor Kuiken,

This letter of objection is submitted on behalf of California Four Wheel Drive Association (Cal4Wheel) regarding the [Stanislaus National Forest Hazard Tree Management](#)¹ (HTM) project. Many of our members and supporters live in and/or recreate in the area covered by the Stanislaus National Forest (SNF) Land and Resource Management Plan (USDA 1991), and [SNF Forest Plan Direction](#)². This objection letter shall not supplant the rights of other Cal4Wheel agents, representatives, clubs, or individual members from submitting their own objections; SNF should consider and appropriately respond to all eligible objections received to this proposed project.

Within the comment letter that Cal4Wheel previously submitted during the public comment period for the Draft EA for this project, we expressed our concerns and recommendations regarding the scope of the HTM project as related to requirements for NEPA analysis, public safety, catastrophic wildfire prevention, and alignment with the Stanislaus National Forest Land and Resource Management Plan. We reiterate our previously stated comments, while refraining from merely repeating them verbatim in this objection letter. As such, our objections are centered on the legal and procedural duty of SNF to maximize the total sum of acreage for hazard tree removal through implementation of the HTM project, and refrain from imposing any limitations to the plan that would diminish or eliminate hazard tree management objectives. Cal4Wheel objects to:

- Failure to Add ML 1 roads to the roadside hazard tree removal segment of this project
 - This is an unnecessary limitation imposed to the scope of the project, resulting in misalignment with the stated Purpose and Need
- Failure to create a detailed long-term maintenance plan to be implemented following completion of initial hazard tree removal efforts
 - It is beyond the realm of reasonable assumption that the need for hazard tree removal and management throughout the project footprint will be resolved for perpetuity following initial implementation of this project; a plan for continued long-term management and removal of hazard trees is pertinent to ensure public safety and prevention of future catastrophic wildfires
- Addition of a 10-year limit to temporally constrain the duration that hazard tree abatement and removal actions would be authorized.
 - Again, it is unreasonable to assume that the need for hazard tree removal and management throughout the project footprint will be resolved within a 10-year period; rather than self-impose an expiration date for the project, the FS should indicate clearly that the carefully crafted standards set forth in the HTM plan will continue without



interruption unless and until changes to the SNF Land and Resource Management Plan are updated in a manner that would bring the HTM into misalignment with the overarching policies and protocol for landscape management in SNF

- Update to management requirement AS-6 to specify that a Forest Service biologist or a USFWS approved biologist or biological monitor trained in Yosemite toad (YT) and Sierra Nevada yellow-legged frog (SNYLF) identification and handling procedures can move species from the direct area of impact during implementation to a safe location.
 - This new requirement places an unnecessary burden on the ability for FS and contracted vegetation management crews to execute each of the sub-projects that will be crafted within the scope of implementation for the HTM plan; rather than require that only a USFWS approved biologist or biological monitor may move Yosemite Toads and Sierra Nevada Yellow Legged Frogs from the direct area of impact during implementation, SNF should allow implementation crews the right and responsibility to relocate each species as needed in order to expedite project implementation

We appreciate the time and effort that SNF has invested into considering public input and recommendations for the HTM project. We support SNF's decisions to:

- Retain all 2,049 miles of road and 261 administrative and developed recreation sites that are slated for hazard tree mitigation and management
- Prioritize ML 2 roads for hazard tree removal to ensure immediate and long-term preservation of access to remote areas of SNF to provide firefighters with safe, navigable roads to address wildfires that may occur in the future, and to protect the recreational infrastructure of SNF through hazard tree removal along each vital route for public access for motorized and human-powered recreational activities

We would like to close by acknowledging that the HTM project presents SNF with an important opportunity to not only positively impact the health and resilience of the forest, but also improve prevention of catastrophic wildfire, increase social and economic welfare of local communities, and increase public access to all forms of outdoor recreation in alignment with the US Forest Service directive to maintain and expand the multiple-use objective.

California 4 Wheel Drive Association would like to be considered an interested public for this project. Information can be sent to the following address and email address:

Rose Winn
California 4 Wheel Drive Association
8120 36th Avenue, Sacramento CA 95824
rwinn@cal4nrc.com

Sincerely,

Rose Winn
Natural Resources Consultant
California 4 Wheel Drive Association



References

1. US Department of Agriculture. Stanislaus National Forest Hazard Tree Management Plan. Accessed and referenced October 2024. <https://www.fs.usda.gov/project/?project=63553>
2. US Department of Agriculture. Stanislaus National Forest, Forest Plan Direction. March 2017. https://www.fs.usda.gov/Internet/FSE_DOCUMENTS/fseprd535378.pdf