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COMMENTS IN RESPONSE TO THE EL PORTAL FIRE RECOVERY AND HABITAT RESILIENCE PROJECT FONSI (#63716)

CSERC PROVIDES GENERAL SUPPORT FOR THE VARIOUS PROJECT ACTIONS AS DESCRIBED

Based upon decades of involvement with the Stanislaus National Forest and its range of vegetation treatment projects that include FUEL BREAKS, PRESCRIBED FIRE, FUEL REDUCTION in plantations, and INVASIVE WEED management, as well as water tank and culvert repairs, etc., our Center generally supports all the above as proposed for the El Portal Fire Recovery and Habitat Resilience Project (Project).

We emphasize, however, that the Project area is uniquely valuable ecologically in that it not only provides suitable habitat for known fisher occupancy and at least one denning site, but also supports a fisher population and territory that is expanding. Thus, many of our comments here will directly relate to protecting and improving habitat for the fisher.

We respectfully ask for further careful consideration of the following specific Project input.

FISHER

Our Center, in coordination with Ryan Kalinowski, wildlife biologist on the Groveland District, and through an MOU with the Stanislaus Forest, conducted camera-detection fisher surveys within the Project area from January 31, 2024 through May 9, 2024. In this survey (conducted after our scoping comments), CSERC detected fishers in the Stanislaus Forest for the first time in more than 30 years of conducting such surveys.

- Our 2024 survey detected at least two individual fishers in an area that is not labeled as fisher habitat on the “Issue 1: El Portal Recovery and North Merced” map. Because of the sensitive nature of disclosing exact locations of fisher detections in these public comments, our staff via email provided exact coordinates of our fisher detections to Ryan Kalinowski on April 9, 2025, who confirmed receipt on the same day. We ask for the map and subsequent Project prescription to be updated to accurately reflect the above-referenced known fisher occupancy.
- We strongly support wildlife biologist consultation if hazard trees larger than 20” dbh are slated for removal in fisher (and spotted owl) habitat.
- The elevated ecological value of the Project area requires elevated precautions against fisher habitat degradation for the construction of fuel breaks, thinning treatments, and use of prescribed fire.

PROPOSED FUEL BREAK SYSTEM

In our scoping comments, we pointed out that the extensive network of planned fuel breaks in this 5,000-acre Project surpasses that of the 94,000-acre SERAL Project. We continue to harbor that concern. The extent and layout of fuel breaks planned for this Project area is extremely high, redundant, in some cases questionably effective, and potentially detrimental to wildlife habitat.

- There is a concentration of fuel breaks in a small area of the Project. Of special concern is the westside loop of Forest Road 2S20 which is mid-slope and serves as little more than added wildlife habitat fragmentation. The value of a fuel break mid-slope is questionable, especially considering there is a parallel ridge-top fuel break planned just to the east of it.
- Strategic areas, such as ridge tops, should be prioritized over less strategic mid-slope locations.
- As described in more detail later in these comments, the high amount of proposed fuel breaks could result in an equally high amount of herbicide use for fuel break maintenance.

USE OF HERBICIDES FOR FUEL BREAK MAINTENANCE

Consistent with our position on other Stanislaus Forest and Region 5 projects, we oppose the use of chemical treatments/herbicides for fuel break maintenance on these almost three square miles of proposed fuel breaks (and up to three times in a ten-year period) as currently proposed for this Project.

- To be consistent with other projects on the Forest, the use of herbicides should be used primarily for invasive plant management, sparingly, and only as a last resort after other hand and mechanical treatment options have been exhausted.

USE OF PRESCRIBED FIRE

CSERC strongly supports applying prescribed fire in the Project area. However, the value of the treatment vs the negative effects of the treatment will depend to a large degree upon whether crews burn with a priority focus to truly achieve a low intensity burn effect overall (with only a mosaic of moderate burn), rather than attempting to rapidly treat the acres to get the burn done.

- Having prescribed fire treatments implemented in a careful fashion with the application of a backing fire or narrower strips of burning may take additional time to complete the burn, but the ecological values at risk will likely have far less degradation for fisher habitat from the burn treatments.
- The planned use of aircraft with less precise ignitions seems risky and unnecessary given the high ecological value of the project area and its relatively small size.
- This area has repeatedly shown a tendency to produce active fire behavior due to rugged terrain, canyon generated winds, southern exposure, and high fuel loading. Use of prescribed fire in this area should be done with the highest caution, by staff who are the best trained in ecological application of fire (not necessarily fire suppression crews), and under the best of conditions.

PLANTATION THINNING

Thinning prescriptions should be conducted to achieve Individuals, Clumps, and Openings (ICO) conditions rather than uniform spacing as described in the Project prescription. This treatment approach will result in more closely mimicking natural conditions and best wildlife habitat value.

CUMULATIVE EFFECTS OF TREATMENTS WITH THE NORTH MERCED PRESCRIBED BURN PROJECT

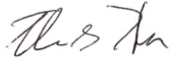
The North Merced Burn Plan, approved by the Forest in 2020, overlaps the western half of the proposed Project and also extends to its west. It allows burning in three great gray owl PACs, three spotted owl PACs, and one northern goshawk PAC. It also allows creation of control lines with bulldozers and excavators. The impacts of these two combined and overlapping projects creates potential cumulative risk and needs to be appropriately mitigated in the Project.

SUMMARY

With an expanding fisher population inside the Project area, our Center urges the utmost care in implementing the various treatments in this Project. We believe the planned system of fuel breaks is excessive; we oppose the use of herbicides as the primary treatment for maintenance on fuel breaks; we urge the Forest to create ICO conditions in plantations; and, we emphasize

that the Project should carefully consider the potential for cumulative effects from the adjacent North Merced Prescribed Burn Project.

Thank you for the opportunity to provide these comments.



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