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Title:
Comments: To Jason, Katie, Michael, and others:

The following comments are submitted on behalf of our Center's staff and members. We fully recognize that CSERC's input with the YSS Leadership Team was already heard and carefully considered by the Forest staff in various discussions prior to the start of the scoping period. However, it is the hope of our staff that the following input can help the Forest to further develop a positive project that will continue to reflect the YSS objective to minimize controversy and to build broad support for an increased pace and scale of forest treatments.

These scoping comments from CSERC aim to primarily give feedback related to (1) Overall Purposes and the Purpose and Need statement, (2) the overall planning approach described in the Scoping Notice, and (3) concerns about descriptions of the various proposed actions as now described.

OVERALL PURPOSES OF SERAL

On page 1 of the scoping notice, there are six bullet points that reflect how the Forest staff sees the purposes of the SERAL project. The way the bullet points are worded gives the impression that the Forest isn't already doing forest planning and active management that incorporates new science[hellip] that the Forest isn't already utilizing fire, or isn't already restoring forest conditions with forest treatments, or isn't already managing the forest in a way that reduces risks and produces wood products for economic efficiency.

In fact the Forest has already done a significant amount of effective forest treatment work in recent years and has consistently approved projects and taken actions to do the purposes listed in the bullets - except that for the first time the Forest is intending to do a landscape scale level of planning across such a large area that the resulting efficiencies of work may lead to more treatments getting planned and approved than if the project was much smaller in size. The EIS should acknowledge that this project is an expansion of already on-going projects and treatments.

Further in these comments, CSERC will focus on NRV, but we note that there are issues tied to how the Forest staff is applying that "science" to this project.

The final "purpose" bullet point does not accurately reflect what is planned for the SERAL project. To our staff's understanding, the SERAL project will not be promoting "[hellip]public access, providing sustainable safe

recreation, or enhancing present and future generations' sense of security and ability to respond when faced with an emergency situation or unexpected change."

Comment: The project is not aiming to expand public access or deal with recreation. And to suggest that it will enhance future generations' sense of security, etc. is unnecessary hyperbole and nebulous rhetoric. CSERC recommends that the bullet point should be dropped from the overall purposes of the SERAL project when it comes to EIS analysis.

On the top of page 2 of the Scoping Notice, the document explains that the focus of the project "is intentionally narrow, as well be the emphasis of treatments under development."

As these comments will discuss further below, the intent of the Bridge Project passed along for consideration by YSS was not as intentionally narrow as the renamed SERAL project appears to be described in the Scoping Notice.

And again, the second paragraph on the top of page 2 fails to provide any clarity or connection to why there is a "purpose" tied to public access, supposedly safe recreation, or enhancing current or future generations' "[hellip]sense of security and ability to respond when faced with an emergency situation."

Comment: We again recommend that the final bullet point "purpose" be deleted. It is unnecessary, debatable, and poorly defined.

PLANNING APPROACH

With all due respect, much of the text under Planning Approach is also highly debatable and reflects someone's opinion rather than fact. It is accurate to write that "traditional" project planning authorizes treatments based on existing conditions. That is true. But the fact that traditional planning has been used over the past decade was often not the reason that project planning took so many years in some instances or that projects "often take greater than 5 years to fully implement."

The reasons for the slow planning productivity and especially for slow project implementation were often due to a lack of sufficient staffing to get work done, the lack of adequate funding to pay for needed work, and especially due to competing demands on staff because there were exceptional events affecting the local forest such as the

Rim Fire, Ferguson Fire, Donnell Fire, drought tree mortality, etc. It is likely misleading to claim the new SERAL project proposal approach "significantly increases the scale of our planning efforts" and that compared to the traditional planning approach, SERAL will be implemented at a far more effective pace. That is yet to be proven.

A speeded up pace of implementation may be the intent of Jason and other Forest staff, but nowhere in the Scoping Notice does the text actually provide any clearly defined explanation as to how the new SERAL planning process will significantly speed up planning analysis, speed up decision-making, or speed project implementation. No descriptive explanation is provided to explain why that speeded up analysis or implementation will somehow occur. Does the forest staff have the answer?

THIS IS A MAJOR SCOPING COMMENT OF CONCERN FROM CSERC.

Comment: THE SERAL PROJECT EIS SHOULD MAKE IT CLEAR HOW LUMPING 92,000 ACRES INTO A PROJECT PLANNING AREA WILL ACTUALLY CHANGE HOW THE FOREST STAFF DEVELOPS AND ANALYZES SITE-SPECIFIC PROJECT ACTIONS WITHIN THE PLANNING AREA, AND HOW IMPLEMENTATION OF APPROVED PROJECTS WILL GO FROM "OFTEN GREATER THAN 5 YEARS" TO A FAR QUICKER TIME PERIOD FOR PROJECT IMPLEMENTATION.

At the moment, in the Scoping Notice, it is all hype that the much-larger-than-usual SERAL project will somehow significantly increase pace and scale. WHY will that increase in pace and scale occur, and HOW will that happen? The answers should be explained and spelled out clearly in the EIS.

Comment: In particular, if the Forest staff envisions that the speedier pace and scale of planning will somehow be due to "condition-based" planning, the EIS should very clearly define how any non-site-specific planning (what most now describe as "condition-based planning") is intended to proceed, how it will differ from "traditional" planning, and how the public will or won't be able to comment on the eventual site-specific project actions.

PURPOSE AND NEED

CSERC recognizes that there are reasons for the Forest I.D. Team drafting up the 5 "purposes" and the 3 "needs."

Comment: The sub-purpose (e.) on the top of page 7 is mixed up backwards. The purpose is to increase the

relative abundance of "shade-intolerant" pines to "shade-tolerant" firs, rather than the opposite wording now in the Scoping Notice. That error can easily be corrected.

Comment: CSERC strongly recommends deleting "purpose 6" which is to "Increase the ability of groups or communities to cope with external stresses as a result of environmental change." We have no idea what the Forest staff is attempting to communicate in describing that intended purpose, but CSERC asserts it is not the role of the Forest Service to "increase the ability of people to cope with external stresses." There already is "purpose 4" listed above on that page that aims to "Reduce risks to human communities, resources, and infrastructure."

There is no justification for a purpose of the SERAL project to somehow be twisted toward delivering an outcome that increases capacity for communities to cope with stress. As already pointed out twice, CSERC respectfully disagrees that the SERAL project promotes public access, provides sustainable safe recreation, or somehow enhances present or future generations' sense of security.

Comment: CSERC urges that the Forest staff delete/remove "purpose 6" as a purpose of the SERAL project.

PROPOSED ACTION

CSERC obviously supports the proposed action to apply Prescribed Fire to Vegetation Management as described on page 8. However, the Scoping Notice is deficient because it fails to provide any reasonable discussion as to HOW the Forest will suddenly be able to shift from struggling to implement a relatively moderate amount of prescribed fire treatments across the Stanislaus Forest to instead expecting the SERAL project to be successful at utilizing prescribed fire and Strategic Fire Management Features over an estimated 10,000-20,000 acres per year. How will that magically happen? That should be explicitly described and spelled out in the EIS.

Comment: CSERC certainly supports (along with the rest of the YSS) a greatly ramped up pace and scale of fire management treatments to be applied across the forest landscape in strategically-selected areas. However, there is no information provided in the Scoping Notice as to how the SERAL project will differ from past traditional treatments -- so that now suddenly the Forest will actually implement fire and fuel-break treatments on up to 20,000 acres per year. That claim in the Scoping Notice appears to be highly inflated rhetoric, but CSERC is eager to learn that there are actually solid grounds for such an inflated claim. What are those grounds? The EIS should fully describe how the SERAL project will not suffer the same constraints as decades of fire/fuel-break projects in the Stanislaus Forest -- which is: it normally takes appropriated dollars to fund prescribed burning and fuel-break construction projects. Unfortunately, appropriated funds are highly competitive and often depend upon Congressional budgets that cannot be predicted in a given year, let alone into the future. With this comment, CSERC urges that the EIS spell out exactly how the Forest staff sees a source of assured funding and sees

assurance for the Forest having sufficient staffing for the accomplishment of an estimated 10,000-20,000 acres per year of fire and fuel-breaks treatments.

Comment: Similar to the above concern of CSERC being skeptical of the Forest having any realistic way to achieve fire management objectives, "Mastication" (especially in plantations, WUI areas, and along roadsides) is intended by the Scoping Notice to be a fuels reduction treatment throughout the project area in feasible locations. CSERC urges that the EIS spell out exactly how the Forest staff sees a source of assured funding to pay for mastication and how the Forest staff sees a clear path to achieving widespread mastication treatments that will shred shrubs, large down woody debris, and small trees for the purpose of reducing fuels and breaking up fuel connectivity across the project area.

Mechanical Thinning Treatments

As described on page 9 under Variable Density Thinning, the SERAL project as envisioned by the Forest staff would apply variable density thinning on 38,000 acres (54% of all conifer forests in the project area). These treatments would focus on the Yellow Pine/Dry Mixed Conifer and the Fire/Moist Mixed Conifer types - which coincidentally are the local forest industry's focus as well because they are most profitable and desirable conifer sites for logging. As noted later in these comments, the intent of YSS was a project with balanced project actions, not just selling wood products to industry. The Scoping Notice does not make it clear how there will be any assurance that a full range of treatments will be implemented, not just sawlog sales.

Diameter Limits tied to CA Spotted Owl and Conservation Strategy

Comment: CSERC supports the Scoping Notice proposal in Table 4 to limit sawlog logging in PACs to a 20" dbh limit in PACs in the 100 acres that are explicitly allowed for mechanical treatment in PACs by the CA Spotted Owl Conservation Strategy. However, the fact is that limited staff, funding and capacity means that the Forest will need to prioritize where mechanical logging treatments are initiated in the early phases of the SERAL project. CSERC urges that the Forest minimize mechanical disturbance in PACs that are active and occupied, and that the prioritization of mechanical treatments should be to first do the least controversial work in areas located outside of PACS.

Comment: CSERC supports the diameter logging limit of 24" for pines and Douglas firs within California spotted owl territories outside of the PAC area, and CSERC supports the project proposal to allow 30" dbh incense cedars and white firs to be logged within owl territories. Those siding with the timber industry may promote the loosening of diameter limits to allow the cutting of larger trees, but if the SERAL project is based upon science,

then there is widespread scientific literature making it clear that it is primarily the removal of trees 16" dbh and smaller in diameter that matters the most for reducing high fire risk, fuel ladders, and high severity wildfires.

Comment: CSERC cautiously supports the proposal in the SERAL project to allow the cutting of incense cedars and white firs up to 34" dbh outside of owl territories and to retain the existing diameter limit of 30" dbh for pines and Douglas firs. We recognize that science affirms that trees over 30" dbh have no significant effect on wildfire severity and that there is generally a limited number of trees larger than 30" dbh across most of the SERAL project area. However, in recognition of the urgency described by North, Safford, Collins, Stephens, and other agency research scientists who support the need for ramping up the pace and scale of treatments, that concession to allow the logging of larger than 30" dbh white firs and incense cedars will assist with economic factors for project implementation and allow for more opening up of some forest stands. In addition, removing more of the fast-growing shade-tolerant white firs and incense cedars from the project area should, over time, inch the composition of the forest in the SERAL project area back toward the more natural condition of pines dominating on sunny, lower elevation forest sites. In addition, regional scientists have told CSERC that the pines are more likely to persist in the changing, warming climate ahead of us.

Comment: CSERC does NOT support the cutting of conifer trees up to 40" dbh for the purpose of supposedly benefitting rust resistant sugar pines and to restore aspens stands. While we fully support actions to benefit rust resistant sugar pines and to benefit aspen stands, the way that the Stanislaus Forest has applied the exception to the 30" dbh logging rule in the past for those two purposes has from CSERC's perspective been illogical, unscientific, and poorly applied.

When a 31"[mdash]39.9" conifer is 50' or 75' or 100' away from a blister-rust-resistant sugar pine, there is no realistic benefit to cutting that conifer on the pretense that it somehow aids the vigor or longevity of the sugar pine. Similarly, when the Forest staff in the past has marked confers up to 40" dbh that are growing in forest areas with aspens, even though the marked trees have often been located 50' or more away from some scraggily aspens, it is highly debatable whether removing those conifers has the slightest benefit to the aspens. In reality, the only assured beneficial outcome is that it benefits the timber industry bidder on the project.

Comment: CSERC recommends that if there is insistence by the Forest staff in applying a "up to 40" dbh diameter limit" for purposes of benefiting rust-resistant-sugar pine or benefiting aspens, that such trees only be allowed to be marked for removal if they are located within 30" of a rust-resistant sugar pine or within 30' of a live aspen.

One page 9 of the scoping document, the cutting of up to 40" dbh conifers is described as acceptable both in Table 4 and in D.2 - Meadows and Aspen stands.

Comment: As noted above, CSERC recommends that instead of 30-40" dbh conifers being allowed to be logged if they are "approximately one tree length of the meadow or aspen clone" (which could be 130-150' distance),

that instead the exception to the 30" dbh limit only apply when 31"-40" dbh trees are located within 30' of the meadow or an aspen clone.

On page 12, D.5 Salvage of Fire-Killed Trees, the Scoping Notice allows for the cutting of hazard trees up to 500' from existing roads, and specifically allows temporary roads to be constructed up to 500' to access such hazard trees. The Scoping Notice incorrectly refers to fire-killed trees as "hazard trees' when they obviously are beyond the distance of reaching to a road if they should fall over. A tree that is beyond 150' from a road or from a developed site is rarely if ever a "hazard tree" and instead is simply a fire-killed tree (snag). CSERC does not support in the name of removing "hazard trees" the logging of snags beyond a distance from a road that is the height of the dead tree. It simply is not a hazard to a road if it is located further from the road than the height of the dead tree.

Comment: CSERC urges that the distance under 1. Hazards to Maintenance Level 2, 3, 4, and 5 NFS Roads be changed to restrict the logging of "hazard" trees to only when the height of the dead tree is sufficient to either reach a road or come within 10' of a road. If the Forest staff has some other intended action in mind for fire-killed trees separate from "hazard" trees, it should be more correctly defined.

On page 13, the Scoping Notice describes Temporary Road Construction. CSERC accepts in a spirit of compromise the proposal to allow temporary road construction as described. But CSERC emphasizes that there are numerous examples in the Forest of roads that were allowed in past projects as "temporary" that never ended up being closed or decommissioned post project. CSERC has raised this issue in the Motorized Travel Management Plan process and in various comments on projects.

Comment: CSERC asks that the EIS define that any temporary road shall be closed and/or decommissioned no less than 3 years post-project use, and that if temporary roads within the SERAL project have not been physically closed or decommissioned within 3 years of project use, that no further temporary roads shall be approved for construction anywhere in the SERAL project area until closure or decommissioning of the "past the deadline" temporary road is completed.

Also on page 13, the Scoping Notice describes invasive weed control. In the description the Scoping Notice admits that the number of infestations and acreages treated each year will depend upon available funding. This reflects a significant flaw in the overall SERAL project description. Logging of saw-logs will occur as intended due to the fact that saw-logs are a desirable economic product that is sold; and thus logging treatments will consistently be implemented as envisioned. Prescribed burning, however, and treatment of invasive noxious weeds both depend upon appropriated funding and sufficient staff capacity as well as the intentional choice by

Forest line officers to make prescribed burning or invasive weed treatments a priority for project implementation in a given year. The fact is that despite lots of good intentions and positive rhetoric, past experience proves that the Forest cannot be expected to actually implement what is described as the intent in a project's NEPA analysis. Logging gets done. Other actions often don't.

Comment: CSERC asks that the EIS fully acknowledge the uncertainty of whether or not prescribed fire treatments and invasive weed infestations will actually be treated in a given year or over the life of the project. CSERC also asks that the EIS consider mitigation requirements to ensure that balanced forest management treatments are actually implemented, rather than only having logging and/or biomass treatments implemented due to their economic value.

On page 15, in describing SFMF, a sentence now reads: "All suppressed and intermediate crown class trees less than 30 inches DBH may be removed."

Comment: CSERC knows that the wording of that statement in the Scoping Notice is NOT what the Forest staff intends. The Forest does NOT intend that within a SFMF, all suppressed and intermediate crown class trees less than 30 inches DBH may be removed." CSERC recommends that the word "all" be dropped so as to accurately convey the information that a large percentage of the suppressed and intermediate crown class trees may be removed, but certainly not "all."

A.2 Outer Core

On page 15, under A.2 Outer Core, the document refers to how SFMFs will be designed and managed. CSERC strongly supports the wording that where snags do not pose a safety risk, up to 4 of the largest snags per acre may be left. It is our experience that the retention of snags at the fringes of fuel breaks outside the inner core poses almost no risk of carrying or spreading fire.

Comment: CSERC supports the Scoping Notice wording to allow the retention of up to 4 of the largest snags per acre where appropriate in the Outer Core area of SFMFs.

Appendix B. Forest Plan Amendments

It was difficult to skim through the 60 different proposed Plan Amendments and to be able to understand which changes are strictly connected to the proposed interpretation of the 2019 Conservation Owl Strategy as described by the YSS Leadership Team and which changes are more expansive or are more targeted to reduce constraints on project treatments. At this time, prior to our reviewing scoping input from the wide range of other forest interests who may point to concerns with the Forest Plan Amendments, our Center currently does not have sufficient understanding of the proposed 60 different Amendments to know which may be problematic or unnecessary.

Issue not addressed in Scoping Notice

It is important that the SERAL project be designed with care to avoid degrading all Forest Plan-defined "eligible" or "recommended" wild river segments that may be within or directly adjacent to the SERAL project. CSERC is supportive of project treatments that will not diminish a river segment from being ranked by Congress as pristine, wild, etc. The EIS should at least identify all river segments that are eligible or any segments that were recommended for wild river designation by the Stanislaus Forest Plan, and then appropriately ensure that the SERAL project will not diminish the eligibility or rating of such river segments.

CLOSING COMMENTS FROM CSERC

It was somewhat surprising to hear during the workshop video call the forest staff describe the SERAL project as being developed so as to provide conditions or criteria for how to apply treatments, and that the specific prescriptions and the specific areas to be treated will be determined at some point ahead. It was not clear if that meant that the EIS will identify with maps and programmatic prescriptions exactly what biomass treatments will be allowed or what prescriptions for forest thinning (VDT) treatments will be described. Likewise, it is not clear when (or whether) the interested public will be informed of such specific project treatment details, and at what stage of public comment that sharing of information will take place.

Comment: The EIS should spell out clearly exactly how the fire risk and high value assets modeling effort (that Peter Stine and others are doing) will be applied to the SERAL project, and how that modeling output will shape specific treatment locations, prescriptions, etc. The EIS should also spell out very clearly to what degree this project is intended to be criteria-based or condition-based, and to what degree it instead reflects the more site-specific intent of the YSS Leadership Team when we handed the envisioned project to the Forest for analysis and implementation

This FINAL COMMENT is the single most important comment CSERC provides in response to the SERAL project.

For reasons that may be a reflection of the MOTORM2K project or that may be a reflection of the Stanislaus

Forest staff seeing how other regions or forests may be approaching large landscape project planning, in this SERAL project the pivotal focus is described as the goal to get the SERAL project area back to the NRV condition that predominantly had more open forest stands than the current forest condition. That objective or goal is so dominant that much of the Scoping Notice becomes an endorsement of that ambitious NRV strategy and the envisioned treatments to get there.

In reality, there is NO SINGLE NRV CONDITION because the Sierra Nevada forest ecosystem over past centuries varied significantly from one decade or period to the next based on whether there were drought conditions, bark beetles, unusually hot summer season wildfires with wind-blown flame fronts, whether there were exceptionally heavy snow packs and wet summer conditions, and to what degree Native American ignitions combined with lightning conditions to ignite fires.

Arbitrarily picking certain numerical ratios or claimed closed-canopy or open-canopy stand conditions from past "NRV" is certainly appropriate to describe as a general past historic condition as is described in science papers. But for the Stanislaus Forest to claim that there is clear science to justify logging existing forest stands aggressively enough to meet a specific ratio of open forest conditions purportedly known to exist prior to forest management may be seen as simply twisting science to justify high levels of logging. CSERC strongly supports an increased pace and scale of the full range of forest treatments, but for the SERAL project to suggest that the priority is to get the project area close to the so-called historic NRV open forest condition for yellow pine stands appears to be a deliberate attempt to skew the YSS proposed Bridge Project and to turn it into a more aggressive logging-focused project than the "multiple-focus, high-use-of-prescribed fire and balanced treatments plan" that the YSS Leadership Team handed off to the Forest staff.

The EIS should not spend page after page attempting to justify intense forest thinning treatments across most of the mixed-conifer and yellow pine stands within the SERAL project area as the leading "objective" to supposedly return the project area to a more natural NRV condition.

First, historically the entire forest landscape was dominated by very large to extremely large older oaks and conifers that had survived countless low intensity fires, had thick bark, had few lower branches, and likely had fewer surrounding ladder fuels than medium large trees have today. Logging large number of medium size trees across the SERAL project area will not suddenly return the project area to a condition dominated by large, old growth trees centuries old. In the project area, 90%+ of those very large trees are simply gone. So to the degree that NRV is generally accurate, it was reflective of a very different forest condition based on dominance of large, fire-resistant trees.

Second, the current climate trend -with longer fire seasons, hotter night time temperatures, and less fuel moisture - certainly justifies managing forest conditions to minimize high severity fire risk. But opening up nearly all conifer stands to 40% canopy cover or similar open stand conditions will, under current climatic trends, make for hotter stand conditions, increase winds through a stand, and will have other negative consequences such as increasing levels of understory brush growth, etc. Again, historic NRV trend information should be just one criteria of consideration to apply to managing conifer forest areas within the SERAL project boundaries.

Finally, the Forest doesn't need to base the SERAL project on NRV to apply forest thinning, biomass removal, prescribed fire, and other fuel reduction treatments that have broad support from YSS and the vast majority of forest stakeholder interests. Creating controversy by basing the SERAL project on a strategy to attain some envisioned historic NRV ratio will not help gain support for the project. Basing the project on the Forest Service applying already supported fuel reduction and forest health treatments is both the intent of YSS and the intent of CSERC.

Comment: CSERC strongly urges the SERAL project team to step back from promoting NRV as the driving force or justification for forest treatments in the project area, and to simply have that science perspective as ONE of many factors for consideration when designing site specific treatments, determining how aggressive to open up forest stands outside of owl territories, and prioritizing whether to primarily log to get to the desired forest condition, or to honestly plan to apply a balanced suite of forest treatments to get to the desired outcome.Those who are skeptics of logging and who do not see commercial logging as an appropriate tool to reduce wildfire intensity and to reduce drought stress and beetle-caused mortality will see the prioritization of NRV objectives as a reflection of the forest staff primarily doing what the forest staff has consistently done over recent decades - figuring out how to cut trees, rather than planning to apply a suite of treatments to best return the SERAL project area to a mosaic of diverse conditions.

Please contact our staff if you have any question about these comments.