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Organization:

Title:

Comments: Dear USFS:

The Center for Biological Diversity submits the following scoping comments regarding the SERAL 2.0 Project.

California Spotted Owl

The California spotted owl ([ldquo]CSO[rdquo]) will be listed under the ESA in early 2024 due to its declining status and threats it faces (such as habitat loss from logging). The proposed SERAL 2.0 Project will likely further cause the decline of this species, as well as loss of its habitat, due to the extensive logging of owl habitat that is proposed. For example, the Project appears to view reductions in canopy cover as falling under [ldquo]maintain or improve[rdquo] owl habitat quality, and the Project would allow significant reductions in CWHR 4D habitat even though there is very little CWHR 5M and 5D habitat in the Project area. In other words, the amount of existing high-quality owl habitat in the Project area is currently very low, yet the Project seeks to log even the next best habitat, the 4D, and degrade canopy cover. Moreover, the Project is not even consistent with the recent owl standards contained in the revised Forest Plans for the Sierra/Sequoia National Forests. For instance, very few of the owl territories identified in the scoping package (e.g., Table B.02-4) meet the desired conditions as stated in the revised Forest Plans, yet many of them would nonetheless meet the desired condition as stated in the SERAL 2.0 Proposal. This is yet another example of how the Project would severely harm already endangered owls.

To evaluate the impacts of the Project on CSO, a PAC-by-PAC and territory-by-territory analysis comparing pre- and post-treatment conditions should be conducted to explain the degree to which logging reduces dense canopied forests that the owls rely on. This is especially needed in light of the current status of the owls and will show why the Project is so harmful to owls.

Marten

The marten is a Forest Service Sensitive Species (and a Species of Conservation Concern on the adjacent Sierra National Forest). Moriarty et al. (2016) found that [ldquo]martens avoided stands with simplified structure, and the altered patterns of movement [hellip] observed in those stands suggested that such treatments may negatively affect the ability of martens to forage without increased risk of predation.[rdquo] The study concluded that [ldquo][g]iven these risks, and because treating fuels is less justified in high elevation forests, the risks can be minimized by applying treatments below the elevations where martens typically occur.[rdquo] Here, the Project seeks to create conditions that are contrary to marten habitat needs. In light of this, the DEIS should specify how marten persistence will be ensured.

Future Salvage Logging

The Project includes logging to salvage trees affected by fire, insects and disease. This speculative decision making is referred to as condition-based management (CBM). We object to the use of this approach as it is contrary to the site-specific analyses required by NEPA.

Sincerely,

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