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Non-Profit ID# 680466959

Stanislaus National Forest

Attn: SERAL 2.0

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Stanislaus National Forest Staff,

The following scoping comments are being submitted on behalf of Ebbetts Pass Forest Watch (EPFW), a 501(c)3 based in Calaveras County. The mission of Ebbetts Pass Forest Watch is to protect, promote, and restore healthy forests and watersheds to maintain the quality of life in the Sierra Nevada. Ebbetts Pass Forest Watch supports responsible forest management and logging methods. EPFW is grateful for the Stanislaus National Forest's efforts to return fire to the landscape and restore wildfire resiliency to our forests.

#### Cumulative Impacts - Privately Owned Timberlands

The PODS proposed for treatment on the Calaveras Ranger District (PODS 3, 4, 7 & 8) are surrounded by and intermixed with privately owned timberlands belonging to Sierra Pacific Industries (SPI). Ebbetts Pass Forest Watch has strongly opposed the way SPI manages their timberlands for over 20 years. The lands surrounding the Calaveras portion of the project are in a severely degraded condition.

They do not support biodiversity

They increase the risk of wildfire

They provide no connectivity for wildlife

The use of herbicides on those lands continues to contaminate both water and soil.

SPI removes the entire over-story tree canopy in their clearcuts and eliminates competition with seedlings using herbicides, with the following impacts:

The forest floor is exposed to increased sun and wind, causing increased surface temperatures and a decreased relative humidity

The temperature increase in turn causes surface fuels to be hotter and drier, resulting in faster rates of fire spread, greater flame lengths and fire line intensities, and more erratic shifts in the speed and direction of fires.

Their plantations and clearcuts have been shown to increase fire risk.

They also lack connectivity for wildlife, and leave little habitat behind to support wildlife and biodiversity.

They leave little to no large woody debris, hardwood trees, or snags to create more habitat.

It is difficult to apply a landscape scale approach to these PODS because the majority of the landscape is being managed for industrial timber production, not ecological resilience (see Google Earth image below).

From Google Earth 12.18.2023

Due to these significant cumulative impacts, treatment for the Calaveras PODS should be modified to:

Eliminate herbicide use

Increase the amount of retained large woody debris

Retain all large trees by lowering the DBH" limit for ALL treatments to 30" DBH

For large trees in meadows, girdle and leave as snags or cut and leave in place

#### Herbicide Use for Fuel Breaks

Ebbetts Pass Forest Watch opposes the use of herbicides. Specific to the SERAL 2.0 proposal, EPFW strongly opposes the use of herbicides in the Calaveras RD portion of the project and the high elevation lands around Herring Creek. The Calaveras PODs are surrounded by and intermixed with SPI lands. SPI uses a tremendous amount of herbicides on their lands. It is not acceptable to add to the already high herbicide load in the watershed. The negative cumulative impacts of adding more herbicides to the landscape far outweigh the potential benefit of the proposed fuel breaks. Due to SPI's even-aged management and clearcut logging practices, their lands are highly susceptible to fire and create increased fire risk. The proposed fuel breaks are highly unlikely to be effective when considering how the surrounding lands are managed. Additionally, the proposed fuel breaks on the Calaveras are far from communities and vulnerable resources. If it is determined to be beneficial to create these fuel breaks far from communities, a combination of prescribed fire and mechanical treatments should be used instead of herbicide use.

There is a significant concentration of protected amphibians in the areas along Herring Creek road, where a fuel break is proposed. Studies show increased mortality rates and changes to amphibian morphology when exposed to herbicides.

We request elimination of herbicide use from the project. Fuel breaks that are far removed from communities should use mechanical methods and prescribed fire for creation and maintenance. Herbicide use in these areas poses far too great of a threat to protected amphibians and should be eliminated.

#### High Elevation Treatments Warrant a Different Approach

High elevation treatment areas should have a different prescription than lower elevation treatment areas. Vegetation growth rates are significantly different, as are relative humidity levels and other important factors that influence wildfire risk and intensity. Treatments do not need to be as aggressive at 8000 feet in elevation as they do at 2000 feet in elevation.

All of the treatments proposed for the Herring Creek area range from 7000 to 8400 feet in elevation, where the risk of high severity wildfire is lower. A 30" DBH tree at 8000 feet in elevation creates little to no wildfire risk, and has taken much longer to reach that size than trees at lower elevations. The DBH limit for all treatments above 7000 feet should not exceed 24" DBH.

Lands above 7000 feet in elevation have reduced fire risk and slower growth rates. Therefore, the treatments for these lands should be adjusted accordingly. The DBH limit for removal of any and all trees above 7000 feet should not exceed 24".

#### Herring Creek Road Fuel Break

The proposed fuel break along Herring Creek Road warrants more justification. Rather than being along a ridgeline, this fuel break would follow the road which varies from being along the creek to midslope. While it may seem convenient to take advantage of the already cleared space created by the road, a circular fuel break around a relatively small area that doesn't follow a ridgeline or terrain feature is less likely to be effective. The impact of creating a fuel break, especially at such high elevation, may outweigh the benefits. Especially considering that fuel breaks are only effective for a short period of time after their creation if they aren't regularly maintained, and the likelihood of a fuel break actually encountering fire while it is in its most effective state is very low. Fuel breaks are not 100% effective.

Given the high elevation and the sensitive resources in the Herring Creek area, as well as the unusual elevational contour following the road and encircling a reservoir, more consideration should be given to the need for a fuel break along the Herring Creek road loop.

#### EAD Process

Ebbetts Pass Forest Watch strongly questions the application of the Emergency Action Declaration process for the SERAL 2.0 project. The "emergency" need is not clear. While we support the need for a landscape scale approach to restoring wildfire resiliency to the Stanislaus, it is hard to call it an emergency when there are other shovel ready projects that would address fire risk which are not currently being implemented. The more limited opportunity for public engagement and the lack of alternatives being analyzed is not appropriate given these circumstances. The pace at which much of this proposed work can be accomplished further diminishes the need for an emergency declaration.

Instead, EPFW suggests that, if the EAD process is to be used, it only be applied to lands that are below 6000 feet in elevation and that pose a direct threat to communities.

#### DBH" Limits

Ebbetts Pass Forest Watch opposes the cutting of trees over 35" DBH. There is not enough evidence to support the need to remove such large mature trees for the benefit of meadows, aspens, fuel breaks or fuel reduction.

Removal of hazard trees over 35" DBH should only occur on level 3, 4 and 5 roads, below 7000 feet, and should be limited to dead and dying trees.

While EPFW supports a landscape scale approach to forest management, we have significant concerns about some aspects of the SERAL 2.0 proposal. Thank you for considering these comments.

Regards,

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