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Title: Executive Director
Comments:

April 1, 2024

Jason Kuiken, Supervisor

Stanislaus National Forest

OFFICES
19777 Greenley Rd.
San Francisco
Sonora, CA 95370

Modesto

Sonora
RE: SERAL 2.0 DEIS Comments

Mailing Address
P.O. Box 3727
Dear Jason,
Sonora, CA 95370

TRT submits the following comments in response to the comment period on the Draft
Phone
(415) 882-7252
Environmental Impact Statement for the SERAL 2.0 project.

Website
TRT agrees that there is a need for significant fuel reduction and forest health
www.tuolumne.org
treatments to be and support the intent and goals of the SERAL 2.0 project area. We
BOARD MEMBERS
recognize that fires in the Sierra Nevada are unavoidable and will happen in one form or
John Kreiter, Chair
Eddie Corwin, Vice Chair
another. While frequent, low severity fire is a healthy, natural process that can create a
Eric Riemer, Treasurer
mosaic forest landscape, we view the threat of large, high severity wildfire to be a
Marek Robinson, Secretary
Jose Borroel
substantial threat to environmental resources, including fish and wildlife habitat, clean
Cindy Charles

Eddie Corwin
water, and clean air. Decades of prior forest management, including fire suppression
Harrison 'Hap' Dunning
and preferential harvesting of the largest trees, has created a forest landscape that is
Eric Gonzalez
Camille King
overgrown and dense with thickets of small trees, a substantial deviation from a
Marty McDonnell
Homero Mejia
resilient landscape with fewer trees of a range in size, including a signifant percentage of
John Nimmons
Iris Stewart-Frey
large diameter and tall trees.
Bart Westcott
Brad Wurtz
We believe the scale of the problem requires a large scale effort to change the

trajectory of forest health. As such, TRT supports the Forest's intent to authorize and implement the same general suite of project actions authorized by the SERAL project, including prescribed burning, fuel reduction treatments, construction of fuel breaks, forest thinning, and site-specific treatment of invasive non-native weeds.

Firstly, TRT appreciates that the Forest Service has removed treatment of "hazard trees" to the forest-wide Hazard Tree Management Environmental Assessement and Draft Decision. We also appreciate that salvage treatements have been removed from this decision. TRT supports separating the condition-based management of insect, disease, drought, and wildfire-killed trees into a separate decision to be released later. We agree that the problems these actions would mitigate do not fit squarely as emergencies and are better considered through a separate decision with additional opportunity for public input.

TRT also recognizes and appreciates the Forest Service's response to our comments and has reduced the acres where herbicides are proposed for fuelbreak maintenance and

has provided greater clarity and intention regarding using herbicides to maintain fuelbreaks. Specifically, the claryfying that herbicide should be used as a last resort treatment requires implementation staff to prioritize other maintenance treatments. In addition, removing herbicide as an eligible maintenance treatment for 50% of the fuelbreak acres is also appreciated. From the cover letter for the SERAL 2 DEIS, it states that the herbicide maintenance treatment will be decided upon at a later decision. TRT supports the decision to leave it out of the SERAL 2 DEIS.

Per the DEIS and cover letter, it is clear that the ID team plans to issue a separate decision regarding this issue. TRT acknowledges and appreciates the decision to defer and afford the standard comment period applied to this contentious topic.

Finally, we appreciate that the Forest Service has removed the Bell Research Natural Area from treatments in the DEIS.

Recommended Improvements to the Plan

We appreciate a number of important adjustments that the Forest Service is considering, which we believe improves the proposed action. We offer the following comments that we believe would further improve the decision.

POD Prioritization

Regarding our critique of the current POD prioritization, TRT appreciates the ID team's method of combining a model-based approach with a qualitative method. The use of

implementation groups is clear. Our critique of the POD prioritization remains, however, as POD 9 is proposed to be included and PODs 4 and 6 excluded from Implementation Group 1. POD 9 is far from any built environment or critical resources. Its our belief that if a fire begins in POD 9, it will most likely burn uphill to the northeast, quickly running-out in more sparsely vegetated granite landscape. Conversely, PODs 4 and 6 are located close to a number of communities and subdivisions along Highway 108. A fire that burns in either of those PODs may also burn to the northeast, moving into the Pinecreast Basin. We recommend including PODS 4 and 6 in Implementation Group 1.

Logging of Very Large Trees

As we stated previously in this letter, the current forest landscape has a deficit of large trees, which are critical to forest health and resilience and important for a number of wildlife species. It is TRT's goal and desire to see an increase in the number of very large trees. Thus, we remain opposed to the removeal of trees up to 40" near meadows, aspen stands, or rust-resistant sugar pines. The few, remaining, very large trees should be retained rather than removed. Overall, it remains unclear why there is a need to remove trees up to 40" within 1 chain of Rust Resistant Sugar Pine, within small meadows, and on all sides of aspen stands. Per TRT's comments in the scoping phase,

there continues to be very little substantiation indicating the science supporting these specifications.

The Response to Comments document cites that many of these circumstances are rare, citing only a handful of occurrences throughout the project area. In addition, we find it contradictory to the express mission of the project to increase the mature conifer component of our forests. Given the rarity of large trees, it is unclear as to why these specifications need to be included in the first place. TRT continues to advocate for removing timber harvest specifications that allow for removing 40" trees. We urge the forest to retain these large-diameter trees to increase the mature conifer component across the landscape and remove any confusion regarding their importance. We continue to propose the following:

(a) conifers larger than 30" dbh will not be approved for cutting and removal from meadows for supposed meadow management reasons;

(b) that very large trees (36-40" dbh) within 66' of aspen stands should not be authorized for cutting unless the target conifer is located to the south or southwest of the aspen stand in close enough proximity to actually shade aspens from direct sunlight; and

(c) that very large trees (36-40" dbh) growing near a rust-resistant sugar pine can only be authorized for logging/removal if the very large tree is within 30' of the rust-resistant sugar pine, not up to 66' from the sugar pine.

Size Limit Clarification - Fuel Breaks, Non-Commercial Treatments

In response to this concern, there is significantly increased clarity regarding the diameter limits for fuel breaks and fuel reduction units via the addition of several tables. TRT appreciates that effort and believes it will significantly benefit the implementation of these projects.

One more issue requires greater clarity regarding the fuelbreaks designated for forest thinning. Currently, there exists prescriptions and dbh tables for forest thinning and fuelbreaks, but it is unclear what prescriptions should be applied for forest thinning treatments within fuelbreaks. TRT presumes the forest thinning prescriptions would be applied. However, it does not appear that the acres were included in the proposed forest thinning summary. TRT suggests an additional section and table be generated to indicate the goals, prescriptions, and dbh limits for forest thinning within fuelbreaks.

California Spotted Owl

The California Spotted Owl is an important species in the Sierra Nevada and proposed for listing under the Endangered Species Act. The owl faces threats from both loss of high quality habitat and wildfire. We are encouraged that the thousands of acres of fuel reduction and forest thinning in the general forest will substantially reduce the risk of high severity wildfires from burning additional habitat of the CSO. However, we would

encourage the Forest Service to be very conservative with any proposed treatments in PACs or Territories including the retention of large and tall trees. If CSO territories encompass private land or areas of poor habitat quality, such as lava cap, adjust the territory boundary to capture other areas on Federal land or of higher quality habitat.

Targeted Grazing

Per response in issue 51, the ID team provided additional management requirements to make the options for livestock watering clear. Given the size of herds required to maintain these fuelbreaks, it is a given that if they are allowed to use riparian areas for watering, there will be impacts requiring adherence to mitigation efforts to meet BMP standards. What isn't clear, and is generally a flaw of the BMP checklists, is that they do not suggest the extent or type of mitigation required. Therefore, mitigation is often achieved at the least cost to the contractor, often at the cost of ecological values. Given this extensive range of interpretations of appropriate mitigation methods, it is TRT's opinion that contractors should not be allowed to use riparian areas to water herds and should be mandated to use water troughs only. A water drafting procedure would be followed to find a local water source to facilitate this requirement and mitigate the cost. Overall, TRT's critiques of targeted grazing continue to be an issue of concern. TRT holds that targeted grazing is not an ideal maintenance treatment and prefers prescribed burning and mechanical/manual treatment as the primary treatments, with herbicide as a secondary treatment.

Temporary Road Construction

TRT recognizes that temporary road construction will be tied to forest thinning contracts. In addition, TRT recognizes that the forest cannot currently implement more than 10 active contracts at one time. This addresses a primary concern regarding opening many temporary roads upon signing this EAD. However, we are concerned that there is lack of clarity about the standards, monitoring, and enforcement of closing and restoring temporary roads. Through on the ground practice and observation, we believe it is easy for contractors to declare temporary roads closed and restored, even if there remains substantial potential for erosion and runoff. We recommend that the Forest Service provide clear standards to which temporary roads must be closed, and greater specificity as to how the work will be monitored and enforced. This will help ensure high quality work that does not negatively cause ongoing erosion and impact local waterways.

Roadless Areas and Wild & Scenic Rivers

We remain concerned about mechanical treatments proposed within IRAs and W&S Corridors. Mechanical treatments may impact recreation, wildlife, soils, etc. While mechanical treatments may not be specifically prohibited in these areas, we believe that

they run counter to the intent and spirit of these designations. Regarding the essential characteristics of the IRA to serve as a reference landscape, TRT believes that impact of mechanical fuels reduction affects the goal of the IRA as a reference landscape permanently. The alteration of surface soils and vegetation would skew any landscape planner who seeks to use that IRA for reference.

Hardwood Protection and Specifity of Treatments

TRT recognizes that the ID Team provided a methodology to determine multistemmed trees' dbh. The method referenced is one of many methods adopted by the USFS across regions and is open to critique, given its limited assessment criteria. TRT also recognizes the challenge of adopting a realistic method to deploy across a project of this scale. Generally, TRT believes that this method of dbh measurement will result in more oaks being eligible for removal to achieve fuels objective, specifically decreasing canopy continrcuity. Given that the DEIS indicates that hardwoods under 12 inches could be removed as biomass, TRT encourages biomass in the form of firewood collection to be incorporated into contracts where extensive oak woodlands exist along fuelbreaks. If more oaks are removed for fuel objectives, it would be essential to do so with intention and ensure the utilization of the valuable hardwood for local firewood markets.

We have received repeated verbal feedback from the public that there is substantial appreciation of dogwoods and disappointment that any dogwoods are removed. Additionally, dogwoods provide important habitat for a number of wildlife species, such as bandtail pidgeons and pileated woodpeckers. The Forest Service asserts that because riparian conservation areas (RCAs), where many dogwoods are found, are protected via BMPs, the impact on smaller size class dogwoods is minor and would not significantly impact the landscape or the species at large.

However, the use of RCAs as a tool to protect dogwoods and other smaller dbh hardwoods is flawed. RCAs are defined by the existence of an ephemeral, intermittent or perennial stream designation from the National Hydrographic Dataset provided in contract maps. As any practitioner would tell you, the National Hydrographic Dataset is inaccurate in categorizing ephemeral and intermittent streams, and many dogwood stands exist outside of a designated RCA. They would, therefore, be required to be removed during a fuels reduction contract.

Given the relatively small number of dogwoods found on the Forest, it would be a small adjustment and effort to retain all dogwoods. To reduce controversy, improve the view of the work by the public, and improve habitat value, we recommend the Forest Service simply retain all dogwoods. In addition, TRT believes that should any madrone be discovered, it should be added to the list of species to retain, given their sparse population on the Forest.

These comments are submitted by TRT to improve the project proposal and to reduce the potential for delays due to unnecessary points of contention. We appreciate the Forest Service's consideration of our comments and efforts to work collaboratively with community members to create the best project possible.

Please get in touch with our staff if you have any questions concerning these comments.

Sincerely,

Patrick Koepele
Executive Director