

Data Submitted (UTC 11): 4/1/2024 4:00:00 AM

First name: Andre

Last name: Sanchez

Organization: CalWild

Title:

Comments:

April 1, 2024

SERAL Interdisciplinary Team

Stanislaus National Forest, Antt : SERAL 2.0

19777 Greenley Road

Sonora, CA 95370.

Submitted via: <https://cara.fs2c.usda.gov/Public/CommentInput?Project=63557>

RE: Comments on Draft Environmental Impact Statement (DEIS) for Social and Ecological Resilience Across the Landscape 2.0 (SERAL 2.0)

To the Interdisciplinary Team:

We at CalWild thank the U.S. Forest Service (FS) for the opportunity to provide comments on the Draft Environmental Impact Statement (DEIS) for Social and Ecological Resilience Across the Landscape 2.0 (SERAL 2.0). We support land management actions that reduce wildfire risk for people and the natural landscape while maintaining and protecting sensitive species and ecosystems. We are especially supportive of actions that restore the function of beneficial fire to landscapes, since it is through this natural disturbance process that resilience will be restored, and the ecosystems being conserved. To this end, we very much appreciate the inclusion of prescribed fire in the proposed action (PA) over much of the project area and that this also includes some areas with prescribed fire as the first entry.

We are concerned, however, that the PA as currently described does not strike the right balance between protecting sensitive resources and logging. We raised the majority of the issues below during scoping, but few changes were made to the PA or the DEIS to address them.

* The analysis is inadequate because it fails to address segment classification (particularly wild segments) in the suitable Clavey and Bell Meadow Creek corridors and provides no map for the public to determine what is proposed in specific wild segments.

* The PA includes 3,344 acres of mastication and mechanical treatment for fuelbreaks in IRAs. The DEIS is correct that the Roadless Area Conservation Rule does not prohibit such actions, but it also states that they should be evaluated based on site conditions. The section in the DEIS is in its evaluation and provides no information about the specific conditions of the site and the necessity for the fuelbreak.

* The DEIS does not address the necessity or purpose for creating this disturbance in the IRA. No mention is made of the need for this fuelbreak to protect communities or other assets. The specific content for the fuelbreak in an isolated roadless area must be addressed in the DEIS to establish importance, necessity and purpose for the disturbance in the IRA.

* There is also no discussion of the design measures that will be implemented to ensure that temporary roads do not become user created roads. The reduction of shrubs and understory trees for a fuelbreak also creates an open linear feature that can become highly accessible to motorized vehicles. Design measures must be included in the PA to ensure that creating the fuelbreak does not lead to illegal motorized use and damage to resources. These potential impacts must also be disclosed in the DEIS.

This concludes our comments towards the specific questions. Thank you for your consideration in this matter .

Sincerely,

André Sanchez
Community Engagement & Conservation Policy Manager
CalWild (previously going by California Wilderness Coalition)
asanchez@calwild.org
559-975-5097