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Organization: Central Sierra Audubon Society

Title:

Comments: RE: SERAL 2.0 DRAFT ENVIRONMENTAL IMPACT STATEMENT

Thank you for the opportunity to comment on the Draft Environmental Impact Statement (DEIS) for the SERAL 2.0 forest treatment project.

I am the President of the Central Sierra Chapter of Audubon (CSAS), based in Sonora, CA. The CSAS board supports your work to increase the resilience of the forest, provide economic opportunities to local communities and reduce safety hazards where necessary across public lands.

The proposed SERAL 2.0 plan represents a significant portion of the Stanislaus Forest. CSAS has strong support for stringent protective practices for California Spotted owls and for other at-risk bird species and CSAS requests full protection for spotted owls from disturbance and loss of habitat.

Our Board concurs with our YSS representative's comments during the scoping period. (see previous letter dated December 8, 2024 from Walt Kruse, our YSS representative). The CSAS Board reaffirms that they do not support the use of herbicides as proposed in the DEIS.

Instead of using a potential carcinogen as identified by the World Health Organization, or other herbicides posing varying levels of potential risk, we encourage you to embrace the SERAL 2.0 proposal for reintroduction of fire into the landscape, forest thinning, mechanical/hand treatments and targeted grazing for maintenance of fuel breaks and for known mapped invasive plant infestations. We support these tools.

Besides safety and the protection of the environment, adoption of the treatment alternatives, excluding herbicide use, will support local businesses which can step in to provide their services to meet the project goals. The SERAL 1.0 plan did not include herbicide use and neither should SERAL 2.0.

There are many good reasons to reverse past practices and re-introduce and initiate forest treatments to avoid catastrophic wildfires, but none should be detrimental to public health, the environment, or wildlife.

Thank you,

Tom Parrington, President CSAS