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Title:

Comments: To Forest Supervisor Jason Kuiken:

The Tuolumne Group of the Sierra Club previously submitted scoping comments for the SERAL 2.0 project. This letter provides our latest comments in response to the proposed action for the SERAL 2.0 project that was put out for public feedback.

## LOGGING VERY LARGE TREES IS STILL INCONSISTENT WITH A NATIONAL POLICY FOR PROTECTING OLD GROWTH AND MATURE FORESTS

As we pointed out in our previous comments, at the national level Sierra Club leaders and activists have been very involved in the discussions over a national policy for Old Growth and Mature Forests. The Sierra Club is aware that there is currently no national policy requirement that prohibits the cutting of large trees. However, Forest Service officials have described the agency's intent to develop an amendment to be added next year to all national forest plans that will lead to the desired preservation and enhancement of old growth forest conditions. In the meantime, our Tuolumne Group urges the Forest in the SERAL 2.0 project to avoid cutting very large trees.

We urge the Stanislaus Forest to limit logging in the SERAL 2.0 project to trees no larger than 30" diameter except for shade-tolerant white firs and incense cedars outside of spotted owl territories (as was policy in SERAL).

## WE AGAIN EMPHASIZE THAT OUR GROUP DOES NOT SUPPORT THE PLAN TO SPRAY HERBICIDES ON FUEL BREAKS

It is our Group's understanding that instead of the SERAL 2.0 project proposing potential use of herbicides for fuel break maintenance across more than 13,000 acres, now the proposal has been reduced to 7,500 acres of possible chemical treatments. While the reduction is meaningful, the approval of herbicides for the SERAL 2.0 project would still allow chemical treatments across nearly 12 square miles of public forest land. To our members and to the national Sierra Club, spraying chemicals across many square miles of public forest is not acceptable.

As we shared in our scoping comments, the Sierra Club opposes herbicide use due to concerns about contamination risk to the public, risk to water quality, and risk to wildlife. Herbicide use for fuel breaks was not proposed for SERAL. Although herbicides may be cheaper and faster than other treatments, herbicide use is still opposed by our Group and likely by many members of the public.

We instead urge fuel break maintenance to be done by prescribed burning or by mechanical treatments. Since the Forest Service has been publicizing its effective use of prescribed burning, that is the main treatment that our Group supports for maintaining fuel breaks in SERAL 2.0.

The only use of herbicides that our Group can see as acceptable is the use of herbicides as a last resort to manage the spread of invasive weeds. We continue to ask that the SERAL 2.0 project be changed to remove the use of herbicides for fuel break maintenance. We ask that these comments be carefully considered now as well as months from now when the Forest prepares to adopt a separate Record of Decision for herbicides and salvage logging in the SERAL 2.0 project.

Finally, as we shared in our scoping comments, the Tuolumne Group recommends that there be the same normal NEPA project planning process as was effectively done for SERAL, with normal opportunities for full

public involvement and consideration of alternatives. We continue to question the need for a speeded up emergency planning process.

Thank you for considering our Group's latest SERAL 2.0 comments.

Keith Martin

Chair

Tuolumne Group of the Sierra Club