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From Dr. Thomas Hofstra, Sta? Ecologist
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COMMENTS IN RESPONSE TO THE EL PORTAL FIRE RECOVERY AND HABITAT RESILIENCE PROJECT FONSI (#63716)

CSERC PROVIDES GENERAL SUPPORT FOR THE VARIOUS PROJECT ACTIONS AS DESCRIBED
Based upon decades of involvement with the Stanislaus NaNonal Forest and its range of vegetaNon treatment projects that include FUEL BREAKS, PRESCRIBED FIRE, FUEL REDUCTION in plantaNons, and INVASIVE WEED management, as well as water tank and culvert repairs, etc., our Center generally supports all the above as proposed for the El Portal Fire Recovery and Habitat Resilience Project (Project).

We emphasize, however, that the Project area is uniquely valuable ecologically in that it not only provides suitable habitat for known ?sher occupancy and at least one denning site, but also supports a ?sher populaNon and territory that is expanding. Thus, many of our comments here will directly relate to protecNng and improving habitat for the ?sher.

We respeccully ask for further careful consideraNon of the following speci?c Project input.
FISHER
Our Center, in coordinaNon with Ryan Kalinowski, wildlife biologist on the Groveland District, and through an MOU with the Stanislaus Forest, conducted camera-detecNon ?sher surveys within the Project area from January 31, 2024 through May 9, 2024. In this survey (conducted afer our scoping comments), CSERC detected ?shers in the Stanislaus Forest for the ?r st Nme in more than 30 years of conducNng such surveys.

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* Our 2024 survey detected at least two individual ?shers in an area that is not labeled as ?sher habitat on the "Issue 1: El Portal Recovery and North Merced" map. Because of the sensiNve nature of disclosing exact locaNons of ?sher detecNons in these public comments, our sta? via email provided exact coordinates of our ?sher detecNons to Ryan Kalinowski on April 9, 2025, who con?rmed receipt on the same day. We ask for the map and subsequent Project prescripNon to be updated to accurately re?ect the above-referenced known ?sher occupancy.

* We strongly support wildlife biologist consultaNon if hazard trees larger than 20" dbh are slated for removal in ?sher (and spoQed owl) habitat.

* The elevated ecological value of the Project area requires elevated precauNons against ?sher habitat degradaNon for the construcNon of fuel breaks, thinning treatments, and use of prescribed ?re.

PROPOSED FUEL BREAK SYSTEM

In our scoping comments, we pointed out that the extensive network of planned fuel breaks in this 5,000-acre Project surpasses that of the 94,000-acre SERAL Project. We conNnue to harbor that concern. The extent and layout of fuel breaks planned for this Project area is extremely high, redundant, in some cases quesNonably e?ecNve, and potenNally detrimental to wildlife habitat.

* There is a concentraNon of fuels breaks in a small area of the Project. Of special concern is the westside loop of Forest Road 2S20 which is midslope and serves as liQle more than added wildlife habitat fragmentaNon. The value of a fuel break mid-slope is quesNonable, especially considering there is a parallel ridge-top fuel break planned just to the east of it.

* Strategic areas, such as ridge tops, should be prioriNzed over less strategic mid-slope locaNons.

* As described in more detail later in these comments, the high amount of proposed fuel breaks could result in an equally high amount of herbicide use for fuel break maintenance.

USE OF HERBICIDES FOR FUEL BREAK MAINTENANCE

Consistent with our posiNon on other Stanislaus Forest and Region 5 projects, we oppose the use of chemical treatments/herbicides for fuel break maintenance on these almost three square miles of proposed fuel breaks (and up to three Nmes in a ten-year period) as currently proposed for this Project.

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* To be consistent with other projects on the Forest, the use of herbicides should be used primarily for invasive plant management, sparingly, and only as a last resort afer other hand and mechanical treatment opNons have been exhausted.

USE OF PRESCRIBED FIRE

CSERC strongly supports applying prescribed ?re in the Project area. However, the value of the treatment vs the negaNve e?ects of the treatment will depend to a large degree upon whether crews burn with a priority focus to truly achieve a low intensity burn e?ect overall (with only a mosaic of moderate burn), rather than aQempNng to rapidly treat the acres to get the burn done.

* Having prescribed ?re treatments implemented in a careful fashion with the applicaNon of a backing ?re or narrower strips of burning may take addiNonal Nme to complete the burn, but the ecological values at risk will likely have far less degradaNon for ?sher habitat from the burn treatments.

* The planned use of aircraf with less precise igniNons seems risky and unnecessary given the high ecological value of the project area and its relaNvely small size.

* This area has repeatedly shown a tendency to produce acNve ?re behavior due to rugged terrain, canyon generated winds, southern exposure, and high fuel loading. Use of prescribed ?re in this area should be done with the highest cauNon, by sta? who are the best trained in ecological applicaNon of ?re (not necessarily ?re suppression crews), and under the best of condiNons.

PLANTATION THINNING

Thinning prescripNons should be conducted to achieve Individuals, Clumps, and Openings (ICO) condiNons rather than uniform spacing as described in the Project prescripNon. This treatment approach will result in more closely mimicking natural condiNons and best wildlife habitat value.

CUMULATIVE EFFECTS OF TREATMENTS WITH THE NORTH MERCED PRESCRIBED BURN PROJECT

The North Merced Burn Plan, approved by the Forest in 2020, overlaps the western half of the proposed Project and also extends to its west. It allows burning in three great gray owl PACs, three spoQed owl PACs, and one northern goshawk PAC. It also allows creaNon of control lines with bulldozers and excavators. The impacts of these two combined and overlapping projects creates potenNal cumulaNve risk and needs to be appropriately miNgated in the Project.

SUMMARY

With an expanding ?sher populaNon inside the Project area, our Center urges the utmost care in implemenNng the various treatments in this Project. We believe the planned system of fuel breaks is excessive; we oppose the use of herbicides as the primary treatment for maintenance on fuel breaks; we urge the Forest to create ICO condiNons in plantaNons; and, we emphasize

that the Project should carefully consider the potenNal for cumulaNve e?ects from the adjacent North Merced Prescribed Burn Project.

Thank you for the opportunity to provide these comments.

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