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August 15, 2020

Forest Supervisor Jason Kuiken
Stanislaus National Forest
Attn: SERAL
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Submitted electronically via comment portal:

<https://cara.ecosystem-management.org/Public/commentInput?Project=56500>

NOTE: These comments are a revised and updated edition of TRT's comments. No information has been removed, but instead information has been added. The original comments have the letter ID of 56500-3447-10.

Re: Comments on the Scoping Notice for the Social and Ecological Resilience Across the Landscape (SERAL) project

Dear Supervisor Kiuken:

Thank you for the opportunity to comment on the proposed Social and Ecological Resilience Across the Landscape (SERAL) project on the Stanislaus National Forest.

Executive Summary

The Tuolumne River Trust (TRT), as a member of the local Yosemite Stanislaus Solutions (YSS) forest collaborative has been engaged in large landscape planning with the Stanislaus National Forest for a number of years. We appreciate the level of cooperation and interaction that has occurred between the Stanislaus National Forest (STF) and YSS in identifying solutions to improve the health of the forest. This SERAL Scoping Notice highlights the successes of this collaboration, learning from many shortcomings of the MOTOR M2K project and providing a path forward for landscape restoration and resilience work.

TRT's following comments are the result of such collaboration and are designed to be constructive criticism, increasing the robustness of the SERAL project, and are not designed to indicate opposition or negative sentiments toward this project. Instead, these comments will hopefully be received as suggestions to improve the document and ensure that the subsequent Environmental Impact Statement reflects the values of not only current stakeholders, but also subsequent stakeholders.

In all, TRT was impressed and happy to see how the Stanislaus National Forest (STF) took our suggestions into account and worked with us to create this project. In particular, we are concerned that the current forest conditions are highly unstable and threaten wildlife habitat and watershed health, and appreciate the efforts to solve this problem.

Our primary feedback is as follows:

- **We would like to see specificity in how SERAL will generate shovel-ready projects;**
- **We would like to see environmental benefits, including healthier wildlife habitat and improved watershed health, listed as a main objective in the purpose and need rather than sub-bullets; and**
- **We would like to see a pathway and process for implementation outlined in the EIS.**
- **We are concerned that conditions-based approaches will be emphasized in the DEIS and EIS, and fear that this will impede a common-ground solution from being found**

We are supportive of this planning effort and look forward to continuing a productive relationship with the STF. Most importantly, we look forward to seeing projects implemented that will improve forest health, protect and restore wildlife habitat, and restore watershed and environmental health to the landscape.

Comments and feedback

Table 1 (page 1):

A breakout of private/public acres and percentages would be appreciated, not only for this table but all landscape data.

“The overall purposes of SERAL are to” (page 1):

The purposes listed here are admirable, but **TRT would appreciate an explicit purpose that states that “best available science will be used to improve, restore, and maintain wildlife habitat”** in the DEIS.

Many listed purposes would result in wildlife habitat preservation and restoration, and many hours of conversation between TRT and the STF have proven that wildlife habitat restoration isn’t an incidental benefit, but is rather a direct benefit. Having this purpose explicitly stated would bring clarity and peace of mind to many stakeholders.

This perspective was one that was also seen during the MOTOR M2K project, which appeared to view the STF as a risk pool, and that work was designed to “mitigate the likelihood of bad things happening”. By stopping “bad things” (catastrophic wildfire) from occurring, good things must incidentally happen, or so the apparent logic seemed (or seems) to be. However, given the commitment of the STF to all facets of the Multiple Use Sustained Yield Act, and its desire to protect and preserve endangered and threatened species and associated high-value habitat through the SERAL project, it would be appropriate and recommended to include this as an explicit and prominent purpose, rather than an incidental or peripheral outcome.

This section continues on to page 2, which references the “intentionally narrow” nature of this project. We are not trying to suggest broadening this project’s scope, but rather that we highlight and call out all of the benefits that “... our forest and the natural resources it provides” will be enhanced through this project.

On that topic, the sixth bullet on the first page, which is to “Manage the forest in a manner that promotes public access, provides sustainable safe recreation and enhances present and future generations’ sense of security and ability to respond when faced with an emergency situation or unexpected change” is not “intentionally narrow”, but rather excessively broad resembles a mission or vision statement rather than a purpose that is actually addressed by this SERAL Project.

Background:

1.01 Planning Approach

This section reflects the shared intention of the STF and TRT to increase the pace and scale of forest health, restoration, and resilience treatments in the Sierra Nevada. As noted, past efforts have been time consuming and arduous, in no small part due to NEPA regulation and compliance. This project attempts to increase efficiency by achieving higher economies of scale in the NEPA permitting process, which is a desire of TRT. The STF attempts to indicate that SERAL will achieve these economies of scale, unlocking efficiency and generating shovel-ready projects. We support this endeavor. However, we would like to highlight the lack of explicit documentation what these shovel-ready projects will look like and when they will be realized. **The subsequent DEIS and EIS should show, specifically and tangibly, what shovel-ready projects will be realized on the landscape.** Many SERAL maps show areas for SFMFs and more, and a logical expectation is that subsequent documents will identify, highlight, and refine unique projects, but this process and the opportunity for stakeholder involvement and input is a key priority for TRT. To successfully accomplish this, we request that specific project details, including project footprints, and treatment descriptions be described in the Draft Environmental Impact Statement (DEIS) so that project impacts can be appropriately analyzed and, where needed, mitigated.

We ask that the preferred alternative clearly show which specific acres, displayed on a map, are proposed for thinning logging and biomass removal. We want to plainly avoid a conditions-based proposal, which a previous court decision determined to not meet the legal requirements of NEPA. Based on our prior discussions with STF personnel and YSS, it was our plain understanding and agreement that the Forest Service would not be pursuing conditions-based treatments for thinning logging and biomass removal, nor indeed for any of the other proposed treatments. As such we believe that the DEIS needs to clearly identify which acres are proposed for these treatments, as well as specific details about the treatment activities.

1.02

Table 2

Aforementioned comments reflecting the breakout between public/private lands would be valuable, and could explain the apparent statistical anomalies of CC-1 and CC-2 (no data for CC-3). These columns

are seemingly outliers, with little to no statistically or practically significant implications on the planning process.

Figure 1

Figure one is an incredibly powerful graphic, showing the purpose and need for this project extremely well. Further expansion on this would be beneficial, including the breakouts of this data into smaller footprints such as smaller watersheds or PODs. **The DEIS should better reflect the NRV and Deviation from NRV on a smaller scale (PODs or smaller watersheds) using LiDAR derivatives and other datasets.** This will provide a greater understanding of both existing conditions and what the post-project goal is.

Purpose and Need

These comments specifically address the “intentionally narrow” scope of this document. Each of the six purposes is vital and essential, and should be included. However, no purpose is explicitly increase, maintain, or restore wildlife habitat. Purpose #3 does address this by de facto, and does reference new science regarding the CSO strategy, does include increasing large tree components across the landscape, and more. However, the primary intention of each purpose, including Purpose #3, is to mitigate risk. Mitigation of risk is inherently important and is desired by TRT. However, we desire that our forests be viewed not solely as a risk pool, needing intervention to stop beetlekill, drought, fire, and more. We view our role and work with the STF as stewards of the landscape, helping to restore it to natural conditions through the mitigation of risk, but also through the enhancement of natural resources as a specific, unique, and express purpose. As such, a purpose under this section that reflects the shared desire to restore, maintain, promote, and enhance wildlife habitat using the best available science is expressly desired by TRT. This would not fundamentally restructure or reshape the scoping document or subsequent EIS in any way to but to **clearly and effectively communicate the full value of the SERAL project**.

One example of how this sentiment could be appropriately reflected in the next section, under “1. Vegetation Management” is a bullet stating, “Improve CSO habitat by modifying forest structure, composition, and fuel loads using a NRV based approach”, in effect saying what item 1.b says, but with added clarity and explicit communication.

It should also be note that under Purpose and Need, bullet 3.e, there is a typo and should say, **“Increase the relative abundance of shade intolerant (e.g., pines) in comparison to shade-intolerant (e.g., firs) tree species”**.

Finally, unless bullet 6 can be explicitly and quantitatively measured using tangible goals and objectives, it should either be revised or dropped.

Proposed Action

3.01 A

As is widely documented, Sierran mixed conifers evolved over tens of thousands of years to depend on frequent, low- and moderate-severity wildflower with periodic high-intensity burn patches. This created

a very heterogeneous forest landscape, which, over the past 170 years has been homogenized through aggressive fire suppression, large-scale clear-cut logging, which targeted the largest trees for harvest, and plantation management. To move forest conditions back towards a heterogeneous state, it is important to restore ecosystem processes that created the condition. In this case fire is the key disturbance process that is lacking. TRT is therefore very supportive of the stated goals of aggressively re-introducing fire to the landscape. While the estimated acres of 10,000-20,000 acres of SFMFs through fire, thinning, and more is admirable, the scoping document does not outline how this will be achieved. While having a backlog of shovel-ready projects is better than the alternative, the scoping document does not provide insight into how this increase in pace and scale will actually be realized on the landscape. Obviously, TRT supports this goal, but **if included in the DEIS or EIS, it must be a robust and defensible outcome of this SERAL project.**

We are concerned that service work, especially fire, which do not generate receipts for the Forest Service, are a significant risk of not being completed. The Forest Service should provide a clear roadmap to ensure that prescribed fire and other service work will be completed. If the Forest Service believes that the full suite of treatment actions is required to restore the landscape, then it also needs to provide a clear framework for ensuring that the full suite of treatment actions will be completed.

3.02, D.1

TRT, foreseeing potential opposition to DBH Limits in Table 4, would like to **voice our support for these DBH limits, recognizing the effort of the YSS leadership and the FS Staff to find a common-ground approach that will be widely accepted by the public.** Arguments for and against this DBH limit will be made, with potential merits, but TRT does support SERAL using the proposed limits as a realistically achievable target and as a way to both improve habitat quality while reducing the risk of losing PACs due to large wildfires.

3.01, D.6

Temporary roads are often necessary for removal of salvage trees, and decommissioning of them is a requisite culmination of their lifespan. However, at times “temporary” becomes “permanent” due to insufficient funds and other reasons. **TRT requests that the DEIS and the EIS use definitive language (i.e. “shall”, “must be”) to create hard targets that specifically identify when the decommissioning process will take place by (i.e. within six months of project completion).** This will help assuage any fears that other organizations may have about temporary roads and help to continue to create an environment of trust and accountability throughout the SERAL process.

3.02, SFMFs

The sentence, “All suppressed and intermediate crown class trees less than 30 inches DBH may be removed.” seems to indicate an aggressive and strong posture. While the word “may” is used instead of “shall”, it is not clear that under every scenario **“all”** of these trees need to be removed. Merely by dropping the first word of the sentence, the intention might be better conveyed. **As such, TRT suggests that the DEIS and EIS modify/expand upon this wording to help show that an array of treatments (which may include removal of all suppressed and intermediate crown class trees less than 30” DBH) will be used dependent on the unique conditions of each SFMF to meet this Proposed**

Action. This will presumably be addressed throughout the site-specific planning that will occur (including the PODs process), but one anticipated benefit of the SERAL process is that the right treatment will be applied to the right area, and some additional expansion/clarification on this topic would be well received.

Map 5.

This map, which is critical for understanding which treatments will occur in which locations, is also frustratingly difficult to read. We urge the Forest Service to consider other ways to display this information and make the associated GIS layers available for public download. That will greatly improve our ability to understand proposed actions and potential impacts.

Thank you for your collaborative approach to completing this planning effort. We look forward to working with you to further advance restoration of forest health on the Stanislaus National Forest.

Sincerely,

A handwritten signature in black ink, appearing to read "Patrick Koepele". The signature is fluid and cursive, with the first name "Patrick" and last name "Koepele" clearly distinguishable.

Patrick Koepele
Executive Director