

Data Submitted (UTC 11): 8/14/2020 11:42:22 PM

First name: John

Last name: Buckley

Organization: CSERC

Title:

Comments: Hi:

Please accept these as supplemental scoping comments from CSERC. After the recent video workshop discussions, questions have come up among forest stakeholders as to exactly how the SERAL project will proceed. Will the SERAL EIS be a programmatic EIS that will have subsequent CE or EA streamlined NEPA decisions tied to it with explicit site-specific NEPA information? If so that would give interested members of the public a chance to provide site specific input.

Is instead the plan of the Forest staff to have the EIS approve the full range of treatments programmatically for the 92,000 acres of USFS lands, and the ROD for the project will then "seal the deal" with no further legal NEPA participation by the interested public? If that is the case, even if it is intended to allow non-formal public engagement and interactive opportunities for input during Implementation Planning, that would mean that the SERAL project is being developed as a Condition-Based project.

CSERC's perspective is that the YSS stakeholder group strongly opposed a condition-based planning project except for the two focus areas where there is broad public support from all interests. Those were prescribed burning treatments and invasive noxious weed treatments, which YSS believed were being proposed for condition-based criteria for treatments due to the non-controversial aspect of those issues.

If the Stanislaus Forest staff has determined that the proposed action or "preferred action" alternative is for the SERAL EIS to be condition-based for allowing (for example) 38,000 acres of thinning logging somewhere within the SERAL project's 92,000 acres or 10,000 acres of biomass removal treatments somewhere within the project area, that would mean that the project is proposing condition-based thinning and biomass treatments - without any site specificity at the time of project approval.

CSERC respectfully emphasizes that approach would NOT be what was supported by the YSS stakeholder group nor by CSERC.

However the Forest staff may be moving forward, it is the intent of these scoping comments to spell out the request that at the very least, even if it is not the preferred alternative, that the EIS provide an alternative that does explicitly show on a map each and every acre planned for thinning logging and possible biomass removal so that there is a legally-appropriate opportunity for the interested public to comment on a specific treatment at a specific location.

It is CSERC's strong recommendation that the Forest avoid the obvious likely outcome of producing an EIS with a preferred alternative that basically allows condition-based logging and biomass treatments, or those along with no identification of potential units or areas where temporary roads may be allowed to be constructed.

The YSS stakeholder group understood in discussions on the left side of the planning triangle that it may not be possible to identify site specific location where the 250' or shorter temporary roads may be approved in order to locate flatter logging landings or avoid impacts to a sensitive site. But in the alternative being requested by CSERC, to whatever degree the alternative can identify at least units where those temporary roads COULD be approved, the interested public would then be better able to provide informed comments.

#### IN SUMMARY

CSERC strongly urges that the EIS provide the preferred alternative with site specific information (such as a detailed map) showing generally the specific areas where logging and biomass treatments are planned to be implemented based upon SERAL ROD approval. Should the Forest staff choose not to make the preferred alternative (or proposed alternative) site specific for logging and biomass treatments consistent with established NEPA, then CSERC asks that the reasonable alternative be provided of an alternative that DOES show the specific sites planned for such treatments.

CSERC closes these comments with the reminder that the broad range of diverse interests at YSS who are banding together to support a large landscape approach have collectively urged that the SERAL project be developed in a manner that creates the least possible controversy and the least likely potential for legal challenges. There is so much room in the middle to get essential work done with strong agreement from all

sides, it would be self-defeating for the Forest Service to intentionally swerve away from that goal and instead promote a controversial approach that results in legal delays and the perception that the Forest Service can't be trusted.

Thanks to the I.D. Team for considering this supplemental comment letter of concern.