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Comments: Our Center intends to provide more detailed comments for the Prather-Medusa Project as we continue to work through the Project description and specialist reports. However, in order to ensure that we comment to gain legal status for the project within the comment time-frame, CSERC provides these initial comments prior to the close of the deadline.

1) Out of all the areas on the Stanislaus National Forest that may be identified as being in need of extensive forest health or fire resiliency treatments, the Prather-Medusa area does not rate as a high priority. There are no residential areas within the project boundary, and the application of the Wildland Urban Interface designation for the area adjacent to the block of private property may technically be allowable, but no high value residential or commercial value is at risk to truly justify the designation. While CSERC does not oppose the Forest choosing to do forest treatments in this project area, it appears that the fact that so much mature forest habitat is present within the project area is a key factor in the choice by the Forest to do project planning for this area - which is remote from communities, campgrounds, infrastructure, or other high risk values. If this project is to be approved, CSERC urges that the Forest intentionally avoid approving unnecessarily controversial actions in the project that will not only potentially result in appeals/objections, but will potentially add to mistrust and a lack of collaborative support for subsequent forest projects.

To state that comment most clearly - there are multiple beneficial reasons for the Forest Service to look for ways to minimize aggravating skeptics of the Forest Service who may already see this project location to be a reflection of the Forest targeting high volume timber stands instead of high-value forest sites in closer proximity to communities, infrastructure, or at risk resources. In the following comments, CSERC points out a number of key concerns and issues that could have controversy reduced if the Forest staff is sincerely interested in minimizing controversy.

2) CSERC questions the strategic choice to log up to 30" dbh conifers in the Home Range Core Use areas of owl territories. The justification of treating forest stands of medium large trees for fire resiliency purposes has been conclusively shown by Forest Service researchers Scott Stephens and Malcom North to not be a credible rationale for cutting medium large trees. It is surface and ladder fuels that matter. In addition, proposing to cut trees in HRCAs larger than 24" dbh makes it appear that the purpose is timber production outputs, rather than resiliency treatments. CSERC will provide further detailed comments in supplemental comments to be submitted soon, but we recommend a 24" dbh limit on logging in HCRAs.

3) CSERC has followed past discussions related to the application of SPLAT pheromone treatments that supposedly reduce mortality from bark beetles. To our knowledge, the Stanislaus National Forest has never yet applied SPLAT Verbonone pheromone treatments for sugar pines on a broad test scale of perhaps 100 acres or more in acreage. Yet it appears now from the project proposal that this still-experimental pheromone treatment approach would be applied to sugar pines across many thousands of acres of the project area. This not only is not yet proven to be a totally benign application of pheromone and additives, but its effectiveness is not yet widely recognized. CSERC also points out that the cost of applying this does not appear to justify the expense to taxpayers when there may be not any related drought period when the risk of infestation of high numbers of mountain pine beetle or western pine beetle may be significant. CSERC initially provides with these comments our recommendation to limit the application of the SPLAT pheromone to a pilot project test site of no more than 100 acres and only to sugar pines within that 100 acre site.

4) As we have raised concerns in the past, it is not evident to our staff and various botanists and biologists who have worked for our Center that there are scientific grounds to justify the removal of conifers of large size to

purportedly benefit aspens. Aspens grew well for thousands of years without the selective removal of interspersed conifers. The middle ground approach to protecting aspens through the minimizing of competition from conifers would appear to be to allow the removal of conifers only up to at most 35" dbh rather than a higher diameter size and only when the proximity of the conifer to a mature aspen is within 30' or less. Allowing the removal of conifers beyond close proximity appears to overstretch any realistic benefit that eliminating that conifer might truly have on the root system or water intake of the aspen. CSERC strongly, strongly opposes the current over-stretch of allowing conifers up to 40" dbh to be cut along meadow edges and "within aspen stands" and in areas south, west and east within 300' of an aspen stand. In a past mark done to purportedly protect aspens by removing conifers up to 40' dbh on the Calaveras District, CSERC provided photo evidence and got staff to agree that many large conifers were marked in excess of 40' dbh. CSERC honestly does not trust the FS staff to be held accountable for ensuring that no trees larger than 39" dbh will be marked based on such extensive mis-marking recently on the Calaveras District. But moving past the mis-marking of large trees, there is not scientific valid benefit proven that removing trees twice the length of the tallest tree is justified to somehow benefit an aspen. This is truly one of those "ecological benefit" strategies that has expanded irresponsibly and unreasonably beyond what may be a legitimate benefit. CSERC spells out at the start of this Prather-Medusa project that there is high potential for our Center to object to/appeal this project which may result in delay and our lack of overall support if the current unreasonably broad logging of conifers for aspen benefit purposes ends up being approved. We guarantee that the local Audubon and local Sierra Club groups will also strongly oppose cutting 40" dbh conifers given such a broad mandate. Without fully going into all details that we will include in supplemental comments, cutting of conifers (perhaps as large as 35" dbh) growing within 30-40' of an aspen may be justified for the purpose of reducing competition. But cutting the relatively limited number of large conifers further than that distance from an aspen will not markedly improve sunlight getting to the aspen or a reduction of competition for water. CSERC again emphasizes that taking out large conifers with a very broad description of "an aspen stand" leads to strong abuse because even one or two scraggly aspens scattered 100' away from a cluster of aspens can then be judged to allow tree markers to expand the aspen stand boundary out to include every inch of forest within a broad area around legitimate aspen clumps. The Forest should know that this issue is going to be highly contentious if the Forest insists on moving forward with the current controversial proposal.

5) At least one objective for treatments within the project area is to reintroduce fire into stands where fire has been excluded for decades and to utilize prescribed fire to reduce surface and ladder fuels. CSERC strongly supports the use of prescribed fire as a tool within the project area. It is not clear from an initial review of the EA to what degree the actual use of broadcast burning will be applied in contrast to burning slash piles, jackpot burning, or other very limited burn treatments. CSERC strongly supports broadcast burning in addition to the needed pile burning, but as now presented, the EA fails to even provide rough targets for different burn treatments. Nor is there any assurance that anything other than pile burning will ever be done because there may not be either appropriated dollars to pay for broadcast burning or the Line Officer at the time may simply not choose to push forward with broadcast burning -- since there is no legal mandate associated with the project description. For all of these reasons, skeptical members of the public may reasonably fear that the Forest will approve the potential use of prescribed fire, but other than pile burning, little if any truly beneficial use of prescribed fire may actually be implemented.

6) Potential changes in canopy cover are explicitly discussed in the EA, and CSERC strongly supports the objective of shifting forest structure back toward a ICO (individual trees, clumps, and openings) type of GTR-220 treatment. We note however that there does not appear to be a strategic focus on replicating ICO type mosaic forest conditions that USFS research scientists identify as most beneficial for reducing high severity wildfire damage and enhancing resistance to drought and insect mortality.

CSERC urges that the final project be far more clear about how the goal of an ICO pattern of conifer forest structure will be achieved, and not how logging lots of medium large trees can be done while still meeting minimum canopy cover targets that are in themselves likely to create controversy. Allowing red fir stands to potentially decrease in canopy cover by up to 60% or for mixed conifer forest cover to be allowed to decrease by

up to 70% is neither science based nor justified in terms of fire risk reduction or forest health goals. CSERC will provide more in-depth comments on this in our supplemental comments.

Due to other competing demands, we are submitting these initial comments at this time, with more detailed input to follow. We emphasize that it appears that the Forest is not doing a reasonable effort to achieve a significant improvement in forest health conditions while minimizing outcry from the interested public. It is our hope that our input can lead to a balanced middle-ground project that our Center and other local and regional forest interests can actually support.

In addition to these initial points of concern and suggestions, CSERC intends to provide more specific, detailed comments in supplemental comments shortly.