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Comments: I write on behalf of the Tuolumne River Trust to express significant concerns about the application of a Determination of NEPA Adequacy (DNA) for this project. As you know, a DNA is allowed if the responsible official determines and documents an existing decision is based on a NEPA analysis that is substantially the same as a previously analyzed proposed action and projects. In this case, the proposed project is based on a decision for the Southern Sierra Post-Disturbance Hazardous Tree Management project in a forest that has thousands of acres of that burned very intensely.

In comparison, this proposed project analyzes areas of the Stanislaus National Forest that has suffered from disease and bark beetle-killed trees, rather than fire burned trees. We find it a stretch to base a decision in this location to that in a different location hundreds of miles to the south, with distinct climate, soil, biological, and environmental conditions. We disagree that the two projects are substantially the same because the underlying environmental conditions are very different.

We encourage the Stanislaus National Forest to take a different, "traditional" NEPA decision-making approach.

Thank you for your consideration.