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Organization: Stanislaus National Forest Grazing Permittee Association

Title:

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Jason Kuiken, Forest Supervisor

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The Social and Ecological Resilience Across the Landscape 2.0

The Stanislaus National Forest Grazing Permittee Association submits the following comments to the SERAL 2.0 Project DEIS.

We agree that the Project should benefit present and future generations that you serve. We also propose that is should enhance and protect Multiple Use as it relates to the proper use of our local resources and a vibrant economy.

Regarding your updates to the DEIS, you propose that "Hazard Trees" will be addressed later in your Forest-Wide Hazard Tree Management Environmental Assessment and Draft Decision Notice.

The permittees strongly recommend that you define "Hazard Trees" to include any trees killed by the prescribed burns associated with the Project, as well as those trees normally identified that impact the safety of the public in general.

Since the implementation of the Project, affected permittees have been left at a great disadvantage regarding the damage dead and dying trees have to the infrastructure needed to manage our livestock and comply with the terms of our grazing permits. Miles of fence lines have been damaged by falling trees as well as some contractors destroying fences with equipment while performing their work. Cattleguards, necessary for vehicles to travel unimpeded along Forest roads had been removed and the pits graded over. (Rightfully so, these have been repaired and replaced). Water troughs important to the proper distribution and management of livestock have also sustained damage.

Of great concern is the liability permittees face where cattle cannot be contained along the Highway 108 corridor and are likely to stray into traffic. The liability when cattle can enter residential and other private property is also a burden no permittee should be subjected to. Permittees are obligated to abide by the terms of their grazing permits and are bound by Annual Operating Instructions which have become labor intensive and economically

hard to endure.

We ask going forward, that you include in your budget the necessary funds to reimburse all documented expenses incurred by permittees for materials, repairs and labor performed resulting from work related to the Project. This should include the expense of labor incurred in gathering and moving stray cattle back to their proper allotments.

We would like to be assured that the Forest, in the decision-making process, strives to improve communication and coordination with Project leaders, contractors and individual permittees.

A recent example is where certain permittees were faced with the chaos of gathering and trailing cattle ready for shipment amid a prescribed burn. The lack of prior communication interfered with their ability to come off the allotment at the end of the season.

Permittees are already used to communicating with our appointed Range Conservationist's on the seasonal expectations and management decisions regarding our allotments. We ask that you consider working out a better process where your Range Cons can get timely information from Project leaders and the needs of the contractors, and that permittees be provided ample notification of the work that will impact their ability to utilize and properly manage the individual allotments.

Comments concerning the use of Herbicides.

We concur the use of herbicides should be limited when possible and used only when safe in areas less likely to have negative effects. The use of herbicide after the Rim Fire exposed cattle, and unacceptable high incidences of abortion were reported according to some cattlemen at that time.

We believe that harvesting timber, use of prescribed fire, mastication, and grazing livestock at suitable levels are all time tested and are proven ways to enhance the resiliency and health of our Rangelands. As the SERAL 2.0 project continues to enhance the overgrown landscape, we anticipate an abundance of nutritious and available forage species. We recognize an increase in livestock numbers will be necessary and are ready to provide them.

As a group of families, we look forward to the continuing and historical partnership with your agency. As the Forest Supervisor, we applaud your leadership, and for taking the opportunity and steps necessary to improve the condition and Multiple Use of the Stanislaus National Forest.

Sincerely,

Rex Whittle, Chairman

Glenn Gray, Mi Wuk District Representative

Stanislaus National Forest Grazing Permittee Association

C/O Marcia Whittle