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First name: Keith

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Organization: Sierra Club

Title: Chair

Comments: To Forest Supervisor Jason Kuiken:

As you are aware, in an effort to collaboratively support the STF staff and YSS, our Tuolumne Group of the Sierra Club accepted the wide range of intensive forest treatments that you approved for the SERAL 2.0 project area in your decision last fall. But we clearly communicated in written comments our Group's strong opposition to the potential use of herbicides (five different formulations) on up to 7,500 acres for the maintenance of vegetation on fuel breaks. We pointed out that the Forest Service has mastication, broadcast burning, mechanical treatments, hand cutting, and targeted grazing as alternatives to chemical treatments.

As was announced at the March 2025 YSS meeting, on March 20th you released a draft Record of Decision #3 to approve the use of herbicides on fuel breaks as spelled out in the EIS. Our Sierra Club group focuses this comment letter on our previously communicated opposition to herbicide use for fuel break maintenance in SERAL 2.0.

Our Group respectfully calls upon you to withdraw your proposed draft ROD to approve the use of herbicides for up to 7,500 acres of fuel break maintenance as described in the EIS. We strongly urge the FS to reduce controversy and to show sensitivity to the conservation community's request that fuel break maintenance be achieved by one or more of the non-chemical alternatives. To state that herbicide use won't be the first choice for maintenance does not in any way assure that it won't end up being the primary treatment for the 7,500 acres based on cost or other factors.

Please withdraw the proposed ROD 3 for SERAL 2.0 so as to remove any approval of herbicide use for treatments of vegetation on fuel breaks. Our Tuolumne Group supports the less controversial alternatives of mastication, broadcast burning, mechanical treatments, and hand cutting.