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Comments: SUPPLEMENTAL PRATHER-MEDUSA COMMENTS FROM CSERC

The following supplemental comments from CSERC are submitted to add to and to further clarify comments our Center previously submitted for the Prather-Medusa EA and proposed action.

KEY EMPHASIS - GET RESULTS WHILE MINIMIZING CONTROVERSY

For years CSERC has worked hard to convince skeptical environmental groups that there are often conservation-based reasons to support thinning logging, biomass removal, reductions in forest canopy cover, mastication of chaparral, and other mechanical treatments that some environmental groups have opposed. CSERC has consistently voiced support for "fuel reduction" forest health projects in the Stanislaus Forest - even when at times our watchdog monitoring has led our staff to discover that tree marking by forest staff has not legally complied with approved project diameter limits or other prescriptions in projects that had very specific thresholds and limits.

Accordingly, it is frustrating if the Forest staff designs what could be a non-controversial project and adjusts it so that it ends up more likely to be appealed (to have an objection filed) or to potentially be litigated.

Worse, controversial projects add to the mistrust that already exists between the Forest Service and those who believe that the USFS consistently favors the wood products and livestock industries rather than aiming to adequately protect water quality, wildlife, wilderness, or recreation.

WITH THESE SUPPLEMENTAL COMMENTS, CSERC RECOMMENDS A NUMBER OF CHANGES IN THE PRATHER-MEDUSA PROJECT THAT WOULD REDUCE CONTROVERSY AND CONCERNS OVER CONTENTIOUS ISSUES.

And early in these comments, our staff emphasizes that is troubling that the lead "relevant issue" identified in the Prather-Medusa EA suggests that economic feasibility for the project is dependent upon "the ability to harvest large diameter trees and the amount of sawtimber per acre harvested." Given the current very positive timber market, the overall limits on other green tree sales available in the local forest, the high quality of most trees within the project area, and the fact that the terrain is very accessible for ground-based equipment - that all totals up to a very sellable wood products project. It is discouraging for our Center (a participant in both the ACCG and the YSS stakeholder groups) to see the objective to sell large diameter trees and a high level of sawtimber per acre be identified as the lead relevant issue. That plays directly into those who mistrust the agency.

* CUTTING LARGE TREES TO BENEFIT ASPENS

As we communicated with our previous CSERC comments, we do not support the logging of 40" dbh conifers based on the premise that removing those trees will substantially benefit aspens. In general, removing conifers up to 30" dbh will be adequate to "release" shaded out aspens and to sufficiently reduce competition for summer season water between root systems. Furthermore, as shared in our previous comments, a middle ground, less controversial approach would be to deviate from the normal 30" dbh size limit for logging conifers and to instead only raise the diameter limit to 35" dbh instead of 40" dbh. That change would not fully eliminate opposition to the cutting of trees larger than 30" dbh by some conservation groups and some individuals, but it would at least

show sensitivity to the competing goals of aiming to benefit aspens while also aiming to retain 30"+conifers for the objective of increasing large trees across the forest landscape.

A second highly contentious issue is the extreme proposal to extend the cutting of conifers to a distance of 300' from the edge of the aspen stand. There are numerous reasons why aspens in upper middle elevations are not doing well, including the fact that the Forest Service consistently allows young sprouting aspens to be browsed year after year by livestock. The lack of frequent low intensity fire is perhaps the single biggest negative effect, and overstocked and overly dense forest stands are also certainly a key negative factor. But cutting trees 150' or 200' or as far as 300' away from the edge of an aspen stand is illogical and scientifically unjustified. The current 300' distance appears to be a deliberate attempt to meet timber targets and to please the timber industry by adding into the timber sale a substantial number of higher value large pines and firs. The proposal is needlessly controversial.

CSERC RECOMMENDATIONS:

- 1) Limit the cutting of conifers for purposes of benefitting aspens to the removal of trees up to, but no larger than, 35" dbh.
- 2) Limit the cutting of conifers larger than 30" dbh to only trees within 50' of a green, currently surviving aspen. Allow the cutting of conifers 30" dbh and less for a distance up to 150' from the edge of an aspen stand.

Do not allow the cutting of conifers up to 40" dbh or the cutting on large conifers beyond 50' distant from the trunk of a conifer to the trunk of an aspen.

* CUTTING LARGE TREES IN AN AREA WITH NO SCIENCE-BASED JUSTIFICATION

The Prather-Medusa project area is one of a limited number of large-tree, mature forest areas still left as broadly intact mid-to-late seral stage habitat within the Stanislaus Forest (as shown in Figure 2-2). Over the years, CSERC has twice passed along to biologist Adam Rich highly credible reports of supposed Pacific fisher sightings within the project area. In addition, CSERC's limited photo-detection wildlife surveys have proven marten detections.

In the past, CSERC failed to convince Calaveras District staff not to aggressively clearcut many of the best, most iconic groves of old growth trees in this area on sites that now have been converted to non-descript tree plantations that are no different than what can be found on heavily managed SPI commercial timberland nearby.

With a less extreme, but still troubling approach with this project, the Prather-Medusa proposal is to log conifers up to 30" dbh in Home Range Core Areas (HCRAs), to cut trees up to 24" dbh in PACs (especially controversial), and to reduce canopy cover greatly (at least based on one portion of the EA) as much as 60% to 70% reduction in canopy cover).

CSERC strongly opposes the proposal to allow the cutting of conifers up to 24" dbh in PAC acres within what are supposed to be WUI areas inside the project boundaries. WUI as a designation in this project area is highly debatable due to the lack of any true residential areas, no communities present, no infrastructure facilities present, etc. We disagree that 505 acres of treatments are justified as being designed within the WUI zone and 77 acres within the WUI defense zone in PACs. To define areas as WUI in this project area is a misuse of the true intent of defining a WUI.

At the most, logging of conifers within the 300-acre PAC zone within the so-called WUI should be limited to cutting trees no larger than 20" dbh. Again, to re-state, there are no true "communities at risk" to justify a WUI designation and to justify intensive medium-large tree removal within a PAC. There is no significant high fire risk

at this location to justify cutting up to 24" dbh trees within PACs or to justify cutting up to 24" dbh trees for the supposed purpose of "protecting" the PAC itself.

As both Malcom North and Scott Stephens each shared in their presentations over recent months to ACCG, scientific studies at Blodgett and elsewhere have proven that there is no fuel reduction fire severity benefit created by removing trees larger than 16" to purportedly reduce high severity fires. They spelled out that it is the surface and ladder fuels that are most essential to treat. Thus, there is no ecological or fire/fuel justification for removing trees up to 24" dbh inside PACs.

CSERC RECOMMENDATIONS:

- 1) Limit the cutting of conifers within PACs in so-called WUI areas to no larger than 20" dbh. PACs are prioritized to be managed for the benefit of CA spotted owls and for the species that they serve as an indicator.
- 2) Similarly, CSERC opposes the proposal to cut conifers up to 30" dbh in HCRAs. Again, there is no science-based justification for fuel reduction purposes for cutting trees of that size; and removing 24-30" trees would conflict with the 2019 Conservation Strategy for the CA Spotted Owl that provides a clear focus to retain large trees for the CA spotted owl.

* MANAGING CANOPY COVER IN THE PROJECT AREA

CSERC has talked directly about canopy cover levels and tree diameter size limits with Malcom North, Scott Stephens, Sarah Sawyer, John Keane, Brandon Collins, Hugh Safford, and other forest scientists who are the supposed "science voice" for the Forest Service. Based on those conversations, we are convinced that canopy cover levels are NOT as essential to the CA spotted owl as was previously believed based on previous scientific studies. We agree that more recent scientific studies have shown that it is large and tall trees, and clumps of large, tall trees in particular that have the single highest benefit to the CA spotted owl and also to goshawks and perhaps other late seral stage forest dependent species.

But canopy cover as a wildlife habitat benefit can still inarguably be positive (based on the communications with PSW scientists) if the canopy cover is not entirely in small tree forest habitat, and if it contains numerous larger trees and clumps and patches of tall, larger trees). That is exactly what is found throughout a large portion of the Prather-Medusa project area.

Accordingly, because there are ZERO COMMUNITIES and ZERO HIGH VALUE FACILITIES and ZERO INFRASTRUCTURE values present within the Prather-Medusa area, there is no "fire risk" justification or rationale that justifies the proposal by the Project to cut many medium large to large trees simply to open up the canopy to 40% or 50% or less.

It appears that the EA is contradictory in terms of managing canopy cover. On page 2-4 it reads:

"Within areas that exhibit mature forest conditions before treatment (see Figure 2-2), treatments will reduce canopy cover by no more than 30 percent from existing levels and will maintain a post-treatment canopy cover of at least 40 percent throughout the treated area."

But Table 2-3 shows that Jeffrey pine, lodgepole pine, and Sierran Mixed Conifer stands could have canopy cover decreased up to 70% and red fir up to 60%. Opening up the canopy of all of these stands so significantly does not create the mosaic ICO conditions described in GTR-220 and GTR-237. It appears to be overkill - giving the impression that the Forest staff is aiming to maximize timber output. This again creates the kind of mistrust

of the USFS from outside area conservation groups or individual activists that ACCG and YSS groups are attempting to get past. Opening up the canopy of any stand more than 30% from its current condition - if that actually is intended in this project - would be truly unnecessary for either forest health or fire resiliency purposes. Reduction of canopy cover by 30% or at most 40% would be a significant improvement for fire risk reduction, while still allowing some moderate closed canopy habitat benefits from shading the forest floor, etc.

CSERC re-states that we disagree that the majority of the project area justifies a very high fire risk rating. While under dry summer or early fall conditions the area is certainly flammable, many of the stands are mostly without dense understory brush fuels, and in many areas there is little in terms of widespread ladder fuels of young trees. Many of the forest stands in the project area are more open in the understory than most mature forest stands elsewhere in the upper middle elevations elsewhere in the Forest. An extreme wildfire risk does not exist across most of the project area.

CSERC RECOMMENDATION:

1) We recommend that if it is not already proposed as a constraint, that the EA - when approved - have a clear threshold criteria that requires that average canopy cover conditions within stands will not be reduced by more than 30% in order to provide a balance between aggressively opening up the stands for fuel reduction benefits, while retaining enough canopy cover to favor shade-favoring species.

MANAGING FUEL BREAKS WITHIN THE PROJECT

CSERC is generally supportive of the fuel break proposal and the limited information available about the fuel break prescriptions. However, the EA does not spell out with any details the planned width of the fuel break (which apparently is 5 miles in length), the prescription for how the project will aim for snag retention at the edges of or within the fuel break area, or how the prescription will be altered when the fuel break overlaps with PAC acres. That last point is raised because one map appears to show the fuel break overlapping with the same color as PAC acres.

CSERC RECOMMENDATION:

- 1) We recommend that the fuel break prescription be for a width of 500', with a 300' central core and 100' additional fuel break outside of core on each side.
- 2) We recommend that the fuel break prescription allow for retention of a limited number of scattered snags in the 100' exterior portion of the 500'-wide overall fuel break area so as to provide snag habitat benefits adjacent to an open habitat foraging area.

*USE OF VERBONONE AND BORAX TREATMENTS

CSERC restates that the use of chemical pheromone treatments to purportedly reduce the risk of bark beetle infestations is not only experimental, but is not proven to be needed within the project area. The cost of applying this treatment does not appear to justify the expense to taxpayers when there may be not any related drought period during which the risk of infestation of high numbers of mountain pine beetle or western pine beetle may be significant. CSERC again restates our concern about the widespread application of an experimental treatment.

Second, the project also proposes to not only apply Sporax to the stumps of cut trees. Given that thousands of trees are proposed for logging within the project area, the application of the borax treatment on such a vast scale will result in widespread exposure to wildlife within the project area. EPA analysis includes descriptions for boric

acid/sodium borate products to cause skin rash, be corrosive to the eyes, and potentially result over the long term in reduced fertility. Past discussions at forest stakeholder groups about the application of borax treatments has narrowly defined its benefit when applied to fir stumps that are vulnerable to the spread of root rot disease. Pines generally do not suffer from root disease in this region. For all of these reasons, the apparent proposal in the Prather-Medusa project to apply Sporax to all stumps appears excessive, with at least some potential for ecological risk to wildlife, and extra expense for taxpayers.

CSERC RECOMMENDATION:

- 1) We recommend that the Forest 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.
- 2) We urge that borax treatments (Sporax) be limited solely to fir stumps which have a far higher potential for the spread of root disease than the stumps of pines or cedars.

*Prescribed fire may be approved but not applied to any major extent

As noted in our previous comments, CSERC supports the proposal to apply prescribed fire treatments extensively within the Prather-Medusa project area, but because the EA described prescribed fire as a follow-up treatment after mechanical treatments, there may end up being little motivation for the District or the Forest to apply appropriated dollars to broadcast burning once mechanical treatments have ended. There is nothing in the project proposal that our staff has seen that actually ensures that the desired prescribed fire treatments will be implemented within a 5-year time frame or some other specific period of time.

CSERC RECOMMENDATION:

- 1) We recommend that the project define a minimum amount of acres that shall be treated with fire within 3 years of project approval, so that there is a clear intent to apply fire ... not just to have it available as a tool that never gets implemented.

IN CLOSING

With so many forest areas in need of a suite of forest health and fuel reduction treatments, the Prather-Medusa project area does not honestly stand out as an area that should be prioritized for treatment. If the current proposed project is approved, CSERC urges that the most controversial pieces of the project should be revised to minimize controversy and to gain the broadest possible support for the suite of actions that eventually will be done within this relatively intact mature forest area.