

16198 Acorn Drive  
Sonora, CA 95370  
March 28, 2024

Stanislaus National Forest  
19777 Greenley Road  
Sonora, CA 95370

Attn: SERAL

The Forty Niner Chapter of the California Society of American Foresters (49CSAF) appreciates the opportunity to comment on the Stanislaus National Forest (STF), Social and Ecological Resilience Across the Landscape 2.0 (SERAL 2.0, 63557), Draft Environmental Impact Statement (DEIS).

The mission of the Society of American Foresters is to advance sustainable management of forest resources through science, education, and technology, promoting professional excellence while ensuring the continued health, integrity, and use of forests to benefit society in perpetuity. One of our principles includes: "Society must respect forest landowners' rights and correspondingly, landowners have a land stewardship responsibility to society. We pledge to practice and advocate forest management in accordance with landowner objectives and professional standards, and to advise landowners of the consequences of deviating from such standards."

49CSAF commented during the Scoping process in a letter dated December 15, 2023, and appreciates the STF review and response to our comments. SERAL 2.0, Volume II, identified 49CSAF as Letter #31 and responded with Comments 17 through 25 (p.5-8).

49CSAF continues with the same comments as presented in the December 15, 2023 letter. This is because the STF stated on-the-ground objectives may not be met with proposed diameter limitations for both conifers and hardwoods, lack of site-specific abilities to vary group openings and stand densities, limiting herbicide use, and not fully treating fuelbreak vegetation. 49CSAF appreciates the clarifications regarding snags and CSO PAC treatment acres.

49CSAF fully agrees with the SERAL 2.0 objectives and supports this project. 49CSAF understands that many SERAL 2.0 limitations are a function of "social and political realities" (DEIS, Volume II, Comment #17). These limitations, created through the Yosemite Stanislaus Solutions (YSS) collaboration and public input, may also help bring this proposed project to implementation. Implementing this project as proposed, although not ideal, is better than no action.

Sincerely



Thomas M. Francis

Chair, Forty Niner Chapter of the California Society of American Foresters