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First name: Thomas
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Organization: Forty Niner Chapter, California Society of American Foresters
Title: Chair
Comments: The Forty Niner Chapter of the California Society of American Foresters (49CSAF) appreciates the opportunity to object to the Draft Record of Decision DN_2; FEIS on the Stanislaus National Forest (STF), Social and Ecological Resilience Across the Landscape (SERAL) Project.

49CSAF commented on the DEIS on January 18, 2022 and indicated strong support for the proposed project. Although, the comment letter documented five exceptions and two comments. 49CSAF compliments the STF for addressing these issues and comments, but still desires to object on two issues:

[bull]eliminate the diameter restriction (or provide exceptions)

[bull]eliminate sanitation-salvage limitations

49CSAF understands the compromises STF made to bring this project forward and does not desire undermining or impeding this project. 49CSAF is not advocating these issues for economics (although economics are important). 49CSAF fully supports meeting the project[rsquo]s very important objectives.

Eliminate the diameter restriction (or provide exceptions)

The purpose for the objection to the diameter limitation is that it will be difficult to meet the stated objectives of this project as described in the 49CSAF January 18, 2022 input letter. I (RPF #20461) prepared an emergency notice on non-federal land that limited diameter cutting to below 30 inches at stump height (California Forest Practice Act, 14CCR 1052.4). Areas of large trees existed up to 300 square feet per acre. Removing only trees less than 30-inch stump diameter retained too many trees and the horizontal and vertical crown continuity continued to exist. This condition (adjacent to federal land) did not meet fuelbreak standards or the landowner[rsquo]s objectives.

Fortunately, 14CCR 1052.4(d)(1)(A), allowed for cutting large trees when objectives would not be met by leaving them. This provision allowed me to designate for removal large diameter understory and damaged trees (e.g., large diameter but short incense cedar, leaning small live crown ponderosa pine, etc.) and better meet the landowner[rsquo]s stated fuel reduction objectives. Therefore, if the diameter limits cannot be deleted then 49CSAF recommends that provisions be made to allow the USFS Certified Silviculturist with Interdisciplinary Team (IDT) input to determine the silviculture method and the tree sizes for cutting in site specific areas to meet the stated purpose and need. This will also allow for better coordination with adjacent non-federal fuel reduction projects.

Eliminate sanitation-salvage limitations

There are an abnormally high amount of sanitation-salvage and dead trees within the landscape (DEIS, 1.01B). Removing most of these trees will benefit the environment. 49CSAF does not support the limits of sanitation salvage proposed in Alternative 1 (Salvage for NRV-based Restoration and Conservation Benefits). STF Forest Land and Resource Management Plan (LMP) already identifies snag retention standards. The additional retention standards imposed by DEIS p.31 are unnecessary and will potentially retain an excessive amount of dead and dying trees. This amount of retained mortality across the landscape will not help meet the project[rsquo]s objectives. 49CSAF supports implementing the already approved LMP snag retention standards along with site specific prescriptions by the USFS Certified Silviculturist with IDT input. This can better ensure snags and dying trees are retained in locations (either as individual trees or in aggregations) that benefit wildlife

and reduce fire and safety hazards. Locations can be in areas (e.g., streamside zones, cultural resources, rocky mid slope, etc.) that allow for surrounding management to help protect the retained mortality.

Sincerely

Thomas M. Francis
Chair
Forty Niner Chapter of the California Society of American Foresters