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Organization: Forty Niner Chapter, California Society of American Foresters

Title: Chair

Comments: see attached

16198 Acorn Drive

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August 18, 2023

Stanislaus National Forest (STF)

ATTN: Benjamin Cossel

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The Forty Niner Chapter of the California Society of American Foresters (49CSAF) appreciates the opportunity to comment on the Stanislaus National Forest Hazard Tree Mitigation, PALS Tracking # 63553.

Safety first! It is of utmost importance that STF maintains roads and major trails, including surrounding vegetation, to their designated levels. Due diligence better ensures public safety and reduces liability issues.

49CSAF fully agrees with the Purpose and Need and supports the Proposed Action for this project. 49CSAF strongly supports implementing this project.

A quick review of other submitted comments on the STF website mostly indicates public approval. A few comments do not support this project either for NEPA compliance or on-the-ground implementation.

Determination of NEPA Adequacy (DNA). The State of California allows timber operations to be exempt from Timber Harvesting Plan preparation and submission (PRC § 4581) to harvest dead, dying, diseased trees (14 CCR § 1038(b); and drought mortality/substantially damaged timberland (14 CCR § 1038(d)) over any size of ownership. Numerous previous NEPA documents on federal land have analyzed hazard tree removal. 49CSAF supports simplified environmental documentation to achieve the stated Purpose and Need for this project.

Forest Wide, Not Site Specific, and Open-Ended. This DNA lists Other Applicable Laws, Regulations and Policy Consistency; Finding of No Significant Impact (FONSI); and Appendix A - Management Requirements. These sections document how the STF's Interdisciplinary Team will help ensure adequate site-specific actions on various habitat types. STF prepares contracts that include mitigations and assigns authorized personnel to administer the contracts. 49CSAF supports an ongoing, efficient hazard tree program throughout the STF.

Tree Marking is not Consistent. 49CSAF accepts the inconsistency of tree marking as this relates to variations of individual personnel, time of day, and environmental conditions. The most experienced foresters can vary their tree marking. 49CSAF

supports tree marker training programs and field audits to ensure overall compliance with the Purpose and Need.

Sincerely

Thomas M. Francis
Chair, Forty Niner Chapter of the California Society of American Foresters
Registered Professional Forester #2046

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