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Comments: The Forty Niner Chapter of the California Society of American Foresters (49CSAF) fully agrees with the SERAL 2.0 objectives (p.6) and supports implementing this project. Timber harvesting, biomass production, and milling capacity must be substantially increased to develop funding capabilities to better manage timber stands in a resilient condition. 49CSAF has a few suggestions and comments as described in the attachment.

From Attachment:

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), Scoping Notice - Proposed Action. 49CSAF fully agrees with the SERAL 2.0 objectives (p.6) and supports implementing this project. Timber harvesting, biomass production, and milling capacity must be substantially increased to develop funding capabilities to better manage timber stands in a resilient condition. 49CSAF has a few suggestions for the Proposed Action that includes the following: [bull] Eliminate the 20 through 34-inch diameter limitations in Table 2 (p.9) and thin the stands to best meet overall objectives and interdisciplinary team (IDT) recommendations.[bull] Provide more flexibility in opening sizes (e.g., up to 3 acres) to allow for better shade intolerant conifer regeneration and allow for better insect and disease management (p.9).[bull] Encourage a lower basal area in Table 3 (p.10) to mostly 75 to 125 square feet per acre (p.10). This is to help shade intolerant conifer regeneration, allow for site class differences, and better thin the forest of ladder fuels and crown interactions.[bull] Allow the flexibility to remove hardwoods over 12 inches in diameter (Table 9, p.14) if they do not meet thinning guidelines for the management area. These are not large hardwoods and they may be ladder fuels requiring removal.[bull] Remove the requirement to retain all brush less than 12 inches in height (Table 9, p.14 ). Small brush quickly grows in height and this requirement conflicts with fuelbreak objectives and increases the frequency of fuelbreak maintenance requirements.[bull] Clarify the snag definition (CON-7, p. 21 vs. Item 2.13 F.x., p.36) as to whether snags are 15 inches in diameter, or 20 feet tall or both.[bull] Allow herbicides to be used when needed for either operational or economical reasons rather than as a last choice (p.28). Include herbicide use in 2.13 D. iii (p.33) to better assure invasive plant control and meet fuelbreak objectives.[bull] Clarify how many acres can be mechanically treated in CSO PACS. Item 2.13 F. iv. (p.35) infers a total of 100 acres within the project area, whereas Item 2.13 F. v. (p.36) clearly states 100 acres within a single CSO PAC. 49CSAF reviewed other Public comments posted on the STF website. Most comments supported this project, but 49CSAF has some comments regarding opposing input: [bull] Diameter Limits. There was one public comment letter stating that allowing up to 40-inch diameter trees to be cut would allow clearcutting. This SERAL 2.0 document clearly does not allow clearcutting. 49CSAF supports Forest Thinning (Commercial Thinning and Selection) techniques to meet site specific needs. 49CSAF supports the use of all established even and unevenaged silvicultural methods (e.g., group selection, small clearcuts, sanitation-salvage, etc.) that meet the stated project's purpose and need. 49CSAF supports forest management that contributes overall to CSO habitat. This includes landscape management that protects the overall ecology as well as specific harvest within PACs. Appropriate timber harvest and cultural treatments within PACs, as determined by the USFS Certified Silviculturist with IDT input, helps to improve conditions for overall forest health and to meet specific CSO habitat requirements.

[bull] Grazing. One public comment mentioned grazing as a negative land management activity. 49CSAF supports grazing as an important tool in multiple use management. SERAL 2.0 includes goats and sheep for fuelbreak maintenance. Goats and sheep provide excellent brush and weed control when properly managed. SERAL 2.0 provides plenty of mitigations for targeted grazing (2.05, p.16-18). 49CSAF supports this specified use as well as general forest grazing that meets Forest Land Management guidelines.

[bull] Herbicides. 49CSAF supports herbicide use as recommended by a California Pest Control Advisor (PCA), applied by California Certified Applicators, and that follows all label requirements. 49CSAF also supports a USFS Certified Silviculturist with IDT input to provide the pesticide recommendation on USFS administered lands. Hand

control methods do not generally succeed.

49CSAF supports herbicide use for controlling invasive plants, reforestation (not part of SERAL 2.0) and fuelbreak maintenance. Herbicide use on the proposed fuelbreaks would be an efficient technique that can better ensure long term vegetation control.

Most observed fuelbreaks in Tuolumne County appear effective for only about 3 years after mechanical treatment (e.g., mastication), thus an aggressive on-going maintenance program will be required. Funds may not be available to continuously treat fuelbreaks mechanically and herbicide use can be an economical and effective follow-up treatment.

[bull] Smoke. 49CSAF supports planned prescribed burning as well as managing natural low intensity fires. Fuel reduction, by any means including fire, minimizes the potential for major landscape level wildfires. Wildfires can significantly damage the environment and create more smoke and health and safety issues than managed fires.

Large scale prescribed burning can help achieve stand conditions (like what existed before the gold rush) that are more resilient to wildfire. The STF is doing the public a service by conducting forest and fire management activities (e.g., thinning, grazing, prescribed fires, etc.).

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