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Title:

Comments: C1: Can the word "best" be removed from bullet point #1? Is this language based in law? I believe the intent of this bullet point is to ensure the silvicultural practices implemented are appropriate and effective. Determining the "best" silvicultural practices depends on what criteria are used and the weight associated with each. The people and organizations who comment, appeal, and litigate projects view forest management in radically different ways and it is unlikely all will agree on what practices are "best". It is relatively easy for a manager to explain that a silvicultural practice is effective at meeting land management objectives, but more difficult or impossible to argue that any given practice is "best" from all points of view.

C2: Five years is a long time for reforestation.

C3: Bullet #6 (c): The wording here can be manipulated to folks leaving a KV plan open until 5 years after the final removal of seed trees which could be 15 years or longer after the original sale closes.

"C1: Pole is not defined. Sapling is not defined. Shelterwood: I note that the definition here retains the 10% stocking threshold. Site preparation is not defined. Two-aged Silvicultural System: the second sentence of this definition causes unnecessary confusion.

C2: The definition of Group Selection Regeneration Method states ""the management unit or stand in which regeneration growth and yield are regulated consists of a landscape containing an aggregation of groups."" The use of ""landscape"" twice may cause confusion related to stand prescriptions.

C3: Advance Regeneration : Think this needs a bit of tweaking to include [ldquo]desired advanced regeneration[rdquo] or similar type word. We have a lot of hardwood advance regeneration in pine stands that we want to regenerate in pine.

C4: Advanced regeneration in hardwoods is more complex then this definition: Desirable advance regeneration: Advance regeneration we desire to develop into the next mature stand, New advance regeneration: Newly germinated regeneration, Established advance regeneration: Capably of existing on the site using local resources other then its own. Competitive Advance regeneration: Advance regeneration capable of competing successfully with its competitors in a full sunlight environment.

C5: Even-aged methods: The [ldquo]less than 20 percent of the rotation[rdquo] is awkward. The range of a 35 year rotation (loblolly) to an 80 year rotation (shortleaf) is really different but they may both be even age stands. Why not say a range of 10 years or whatever is appropriate for the species in question.

C6: Intermediate Treatment: How about putting the word [ldquo]health[rsquo] before the word growth. We have been prescribing treatments overall to maintain forest health first [ndash] the other items fall into place under that.

C7: A [ldquo]tending[rdquo] treatment. Is this a typo? If not, how about something more descriptive of what is actually occurring. Like: The selective felling or removal of trees in a young stand primarily to accelerate diameter increment on the remaining stems, maintain a specific stocking or stand density range, and improve the vigor and quality of the trees that remain.

C8: Reforestation: Renewing ? [ndash] How about [ldquo]reestablishing[rdquo] tree cover [ndash] Renewing is not very descriptive.

C9: Reforestation Treatment: A reforestation treatment can also be site prep for planting. That seems to be missing.

C10: Regeneration method: Sounds like the last sentence was tacked on as an afterthought. How about: Regeneration Method. A procedure by which a new age class is created. May occur by harvesting or by fire. Major harvesting methods are categorized as even age or uneven age. Even age harvests methods include clearcutting, seed-tree, shelterwood, and coppice. Uneven age harvest methods include single tree selection and group selection.

C11: RESERVE TREES: Need to include whether reserve trees are left in perpetuity or not. Or state that they can be removed at a later date. The word [lsquo]indefinitely[rsquo] is not a good word to use here either.

C12: Resilience: The comma after [lsquo]absorb[rsquo] doesn[rsquo]t need to be there. The whole sentence doesn[rsquo]t really work. If I break it up [ndash] ecosystem recover from disturbance through preservation of its structure and function - preservation? What is doing this preservation, restoration, or improvement? Kind of needs more work on this one.

C13: Silviculture: The definition should include [ldquo]to meet the diverse habitat needs of wildlife as well as the needs and values of landowners[hellip]..

C14: Silvicultural Prescription. An s indicating plural needs to be added to the words treatment(s) and sequence(s) in this definition.

C15: Single Tree Selection Regeneration Method. An uneven-aged method where individual trees of all size classes are removed more or less uniformly throughout the stand, to promote growth of remaining trees and to provide space for regeneration. Since this is a regeneration method, the regeneration should come before growth of remaining trees in terms of importance.

C16: Salvage Cut. [hellip]"A salvage prescription should only be used for intermediate harvests where an adequately stocked stand will remain and regeneration is not an objective." A salvage event could result from a tornado or hurricane and regeneration almost always is required. Timber is going to sell the trees as salvage but regeneration most likely is required.

C17: Stocking Level: ""The degree to which trees occupy the land, measured by basal area or trees per acre, compared with stocking standards for full utilization of the land[rsquo]s growth potential." So the next question is what is a land[rsquo]s growth potential. This is not defined in this section. Would adding another sentence like [ldquo] which is based on site index[rdquo] work. Or is it defined in the overall document if this is just an amendment to the document.

C18: As an agency we should make a decision to align our definitions and business rules with the SAF Dictionary of Forestry or not to. For example: Right now our definition of CCWRes Regeneration method will produce a two-aged stand that is not in alignment with the JOF DOF definition of a two-aged stand. "

C1: I note that this version of FSM 2470 makes many requirements relating to prescribed fire. In contrast, the currently posted FSM 5140 (April 2, 2020) makes zero references to silviculturists or silvicultural prescriptions. If the FSM 2470 and 5140 are not aligned the requirements in 2470 are "invisible" to many line officers and fire staff who logically seek guidance relating to prescribed fire in the prescribed fire manual (5140). The silvicultural workload related to prescribed fire as written here is probably orders of magnitude higher than many line officers and fire staff may realize. Also, I note the general approach in this section is more aligned with a bottom-up silviculture/ timber-focused / fully regulated forest approach rather than a landscape ecology / habitat/ "new forestry" approach.

C2: Certified Silviculturists are hard to come by in certain areas. We need more available training to obtain and keep up with our certifications

C1: Inconsistency: Bullet #1 indicates that examination, diagnosis, prescription, and evaluation can be undertaken in areas other than stands, but many sections of this manual (e.g. 2471.03) refer specifically to stands and thus conflict with this statement. An obvious example of a "specific area" other than a stand where examination, diagnosis, prescription, and evaluation is undertaken is the prescribed burn unit. Traditional timber production / fully regulated forest workflows do not align perfectly with landscape-level prescribed fire treatment.

C2: Bullet 2: Within the USFS, most objectives are derived from the Forest plan.

C3: Bullet 5: orderly "and timely"

C1: Bullet 4: Base detailed prescriptions, upon current[hellip] and Bullet 5: prepared, or approved[hellip]Don't need commas in either of these locations.

C2: Bullet 5: . [hellip]."The use of prescribed fire and mechanical treatments such as mastication on forest and/or woodlands qualifies as a silvicultural treatment." Our Fire shop is doing mastication and dropping trees in the WUI. Same with the Forest aquatics biologist proposing dropping trees in riparian areas. All this should be in a prescription signed off by a silviculturist?

C3: Bullet point #6: specify where prescriptions should be filed.

C4: Bullet point #5: I interpret this section to require silviculturists to visit every unit, but not every acre of every unit, unless the RF establishes an exception.

C5: Though incredibly important and identified here as required, we as an agency (or maybe just R8), don't prioritize funding for stand examinations like we do heritage surveys or botany surveys that meet specific legal requirements.

C6: The rub or confusion in bullet 3 is silvicultural activities include management for other objectives like making a pond for WL or fuel reduction? A silviculturist would say yes because it is vegetation modification a wildlife bio or fuel manager would say it is not.

C7: Silv activities in bullet 3 and silv treatments in bullet 5 are similar but are they the same? This might add to the confusion between resources.

C8: The confusion identified in C6 and C7 is acerbated by the statement in 2471.3: "...including prescribed fire as a silvicultural tool." Is burning for fuel reduction objectives a silvicultural tool?

C1: Who is a "prescribed fire specialist" or a "fuels specialist"?

C2: DRs without a timber background probably need to be more involved with the prescription development to ensure forests desired future conditions are being met not just in fire. Is this statement being added to other duties in a main document?

There might be a need for ID Team Discussion. I think this might be the area for it.

C1: I would like to see something in this paragraph that says prescriptions should not be a regurgitation of the EA. Maybe say something along the lines of [ldquo]concise description of the [hellip].[rdquo]

Us old folks that went through doing presentations and defending a prescription to the RO still think that is a valuable step to becoming a silviculturist. Eventually in one[rsquo]s career, one is going to have to defend a prescription and the experience of already doing it will help them. The task books are good but that final defense is really valuable. Even if just done at the forest level.

Is bullet point #6 actually true? Is this based in law? Much of the work we seek to accomplish (habitat, fuels) moves stands in the opposite direction. Even in stands managed primarily for timber production (which some forests do not have), are the assumptions that the quality and yield of stands 1) should be improved, and 2) can be improved backed by data and aligned with our understanding of climate and disturbance regime?

Bullet point #5 (KV funding preference): in hardwood stands where reforestation work may occur many years prior to timber sale it is not the contract that precludes use of KV funds: it is the fact that the funds do not exist prior to harvest. K2 funds collected from prior sales may be an option, with some limitations (e.g. 2 year limit).

Site prep can occur prior to harvest, and in some cases should occur prior to harvest.

With southern pine, a release treatment is practically a necessity or you lose the stand (to competition). Which is implied in the statement above. Is there anyway release can be moved to [ldquo]required reforestation[rdquo] on KV plans.

I interpret this section (in combination with 2471) to require CSE exams in all stands affected by stand-replacing natural disturbance, followed by stand-level diagnosis and prescription, treatment if in land class 5XX/6XX, and monitoring. This can be an absurd amount of work that staffing and budget may not support. The intent behind the statement about sample design is not clear.

Is bullet point #4 true and/or based in law? Increasing biomass per unit area = increasing fuel loading. Increasing growth and yield or improving timber quality are not necessarily bad things, but they are not the only things. Perhaps add a clarifying statement addressing when or where maximizing growth rate and product quality are objectives (NFS land class 500?).

Wording is acceptable. I note that wildlife / ESA may require retention of the ugliest individuals, and ultimately GS-5/6 timber markers are being asked to implement silvicultural prescriptions where leave trees are selected.

These two paragraphs are difficult to understand. I think the author means to say that a growth and yield monitoring program based on regional guidance will be implemented.