Data Submitted (UTC 11): 8/16/2020 7:00:00 AM
First name: Gerald
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Organization:
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Comments: Please see attached letter.

Jason Kuiken

Forest Supervisor

USDA - Stanislaus National Forest

19777 Greenley Road

Sonora CA, 95370

Re: Federal Register Notice Volume 85, No. 137 published July 16, 2020 Pages 43205- 43206 Titled [ldquo]Stanislaus National Forest; California; Social and Ecological Resilience Across the Landscape EIS[rdquo]

Action: Notice of intent to prepare an environmental impact statement.

As provided for in your Scoping Letter, I am submitting Comments electronically to: https://cara.ecosystem-management.org/Public/commentInput?Project=56500.

Dear Mr. Kuiken,

Thank you for the opportunity to comment on the SERAL project scoping document. I agree that the Stanislaus National Forest needs to take this step to move toward landscape-scale projects. I, as a member of the Yosemite/Stanislaus Solutions (YSS) collaborative group support your Interaction with the Collaborative to ensure that a diverse range of viewpoints and expertise has been taken into consideration as the forest moves towards a decision.

I am a Registered Professional Forester, #1036, in the State of California. My entire 40-year career has been involved with managing the Pacific Southwest Region[rsquo]s diverse forest lands. I have worked on the Stanislaus NF for two periods: summers from 1961 to 1963, and as the Small Sale Officer for the Calaveras RD from 1969-1971. I retired from the Regional Office as Section Head for Sale Administration R5 in 2002 and have lived in Tuolumne as a consulting Forester since then. I was also a member of the Wilderness Volunteers for over 10 years and believe in the value of Wilderness. I strive to support the best management practices for the

forests of the Stanislaus NF for all of their many goods & services.

The Overview & Purpose & Need statements on pages 1 to 7 are great descriptions of the problems the Stanislaus NF is facing and general solutions to fix them. I think the amendments to the Forest Plan to incorporate new Spotted Owl guidelines are a big improvement of current plan standards. However, the proposed action starting on p. 8 could be significantly improved.

1) Use of prescribed fire, p.8 OK, (I don[rsquo]t personally believe it will be as successful as the documents states), but there is no mention of the use of [ldquo]managed[rdquo] wildfire. This is an emerging trend in R5 with examples on the Lassen & Inyo. We need to know if the Stanislaus NF will use [ldquo]managed[rdquo] wildfire using emergency funds instead of appropriated fuels dollars with very short or no Environmental Analysis (EAs) or public input.

2) Variable Density Thinning p.9 [ldquo]Variable density thinning treatment areas displayed in Map 5

include Yellow Pine/Dry Mixed Conifer and Fir/Moist Mixed Conifer vegetation types in CWHR class

3M, 3D, 4M, 4D, 5M, and 5D, located on NFS lands, within 0.25 miles of existing roads, and where

mechanical operations are not precluded or restricted by law, regulation or policy[rdquo]

I note the limit of thinning to within .25 miles of existing roads. While there is a general desired to limit road density, I request that this arbitrary standard be dropped and appropriate skidding distance for a project be set by, or for, the specific project/contract. What if conditions dictate thinning .3 mile from existing roads? Where is the [ldquo]science[rdquo] in this standard? (Later, on p. 12 operations appear to be even more limited to Class II & higher roads.)

3}} Table 3. Desired Structure within forest stands based on NRV p10. OK, but the listed desired maximum densities are at the upper end of desired basal area (Yellow pine/ dry Mixed Conifer) 200 sq. ft/ac means any increase in density will result in competition induced mortality. Silviculturally, we would reduce maximum basal area for forest health and let the basal growth increase until the next cutting cycle. I agree with CFA[rsquo]s discussion on this point.

4) Table 4. Diameter limits [hellip] Spotted Owls. OK, but if stand density gets to high because of the number of trees per acre over the diameter limits, whole stands will die (AS WE SAW in the DROUGHT). Bark Beetles often kill groups of stressed trees regardless of diameter. I request that these diameter limits be stated as an objective unless higher limits are needed to meet project objectives.

5) Salvage of Fire-Killed Trees. P.12 This section is unacceptable to me. I don[rsquo]t believe we could ever salvage and reforest a large fire (Or RIM fire) under this section. The last sentence in the following paragraph must be modified or clarified.

[ldquo]1. Hazards to Maintenance Level 2, 3, 4, and 5 NFS Roads: Fire-killed (or dying) hazard trees may only be removed when the need for temporary road construction to retrieve and remove the tree(s) remains less than 500 feet. Hazard trees requiring a temporary road greater than 500 feet for removal, or those whose removal may harm cultural or other sensitive resources that cannot be mitigated, will be cut and left on site.[rdquo]

What about resulting fuel loading, brush regrowth through the dead timber on the ground, and possible reforestation needs?

6) Salvage When large Fire Area is Above the Threshold of Concern (THC) p12-13. Salvage is only permitted when the burn area is below the THC. What if the fire area needs to be reforested for any number of reasons, and if reforestation will help to stabilize the watershed and hasten watershed recovery? (RIM Fire?)

7) Fuelbreaks. P14-15. Generally OK but contains another unacceptable diameter limit.

[ldquo]In all SFMFs, intent is to retain canopy shading (based on site[rsquo]s tree spacing) to the extent feasible to discourage understory growth while still meeting strategic fire objectives. Tree removal will occur by ground based mechanical thinning, hand thinning, or piling and burning. For retention, pine and hardwoods will be favored for fire resistance, and may be pruned to achieve adequate height to live crown to reduce ladder fuel potential. All suppressed and intermediate crown class trees less than 30 inches DBH may be removed. All live conifers 30 inches DBH or larger will be retained, except to meet needs for equipment operability or safety.[rdquo]

The situation will probably not occur often, but there are a few stands where trees over 30[rdquo] DBH are too dense to meet fuelbreak standards (crown touching for instance) and certainly to dense to maintain healthy trees (Remember DROUGHT Mortality when the big trees died? The diameter limit must be changed to an objective, not an absolute standard.

8) Vegetation Mgt. p18. Retain 4 to 6 of the largest snags/ac. The high stand of the standard is too high. I know that [ldquo]more is better[rdquo] but I am not familiar with [ldquo]science[rdquo] that quantifies the increase in wildlife at 6 snags/ac over 4/snags per ac. 6 snags per ac would be approximately 85 feet apart across the landscape. This standard conflicts with fuel loading requirements because all these snags will fall over as we have seen in the RIM fire. It also prevents any reasonable economic recovery which was so highly desired in the goals stated on page 6. There needs to be an exception or [ldquo]clumping[rdquo] rule for snags remaining in areas to be reforested (planted). The Stanislaus and other forests in R5 have had to fall snags in areas to be planted due to safety concerns. Experience has show that some economic value can still be recovered with four reserved snags/ac, but I doubt any salvage or recovery of timber is practical when leaving 6 of the largest snags/ac. Harvest of timber is one of the Purpose and Needs of the proposed action.

Several sections of the Proposed Action need to revisit the [ldquo]Overview and Purpose and Need for the Project[rdquo] section. Well stocked and growing forests pull carbon from the air and sequester it. Dead trees, unstocked lands and brush fields release carbon back into the air and don[rsquo]t grow replacement wildlife habitat.

The public needs to recognize and acknowledge the large amount of Wilderness and Roadless areas that contain many of the wildlife objectives such as thousands of snags

9) Salvage of Fire Killed Trees p19. Actually, has some needed flexibility. Permits salvage of a fire killed tree over 40[rdquo] DBH, but I doubt that it would ever be used because they would be left for snag standards.

[ldquo]Trees that are expected to die within 5 years will be removed using the 70% probability of

mortality rule, except trees larger than 40 inches DBH would use the 90% probability of mortality rule, as

defined by Marking Guidelines for Fire-Injured Trees in California (USDA Forest Service 2011).[rdquo]

//Gerald Jensen//

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RPF #1036