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Comments: 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 (SERAL) Draft Environmental Impact Statement (DEIS). This input is in response to the Summary of Major Conclusions and Identified Issues.

Summary of Major Conclusions

49CSAF fully agrees with the Purpose and Need for this proposed project. 49CSAF strongly supports implementing this project as described in Alternative 1, preferably with the following exceptions:

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

[bull] eliminate sanitation-salvage limitations

[bull] eliminate maximum temporary road length and allow on-site decision making

[bull] eliminate snags in fuelbreaks and allow for strategic snag placement in appropriate areas

[bull] allow herbicides to help maintain fuelbreaks

49CSAF also wants to stress the need to ensure:

1. continuous funding to implement cultural treatments

2. professional forestry expertise from USFS Certified Silviculturists, or other qualified professional foresters, are used throughout the process (NEPA and field work). Other qualified professional foresters include California Registered Professional Foresters (RPF), and Society of American Foresters (SAF) Certified Foresters.

Issues

49CSAF comments to the main issues listed in the DEIS (DEIS, 3.01) are as follows:

1. Forest Thinning and Tree Removal

A. Forest thinning and removal of trees will eliminate high-quality California spotted owl (CSO) habitat and contribute to the decline of the owl.

B. Forest thinning and removal of trees within CSO protected activity centers (PACs) is not necessary to effectively reduce the landscape[rsquo]s susceptibility to wildfire-, drought-, and insect and disease related mortality.

49CSAF supports forest management that will contribute overall to CSO habitat. This includes the 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 Interdisciplinary Team (IDT) input, helps to improve conditions for overall forest health and to meet specific CSO habitat requirements. Therefore, the proposed project will help maintain and improve conditions for the CSO.

The California Forest Practice Act (FPA, 14CCR 953) defines Commercial Thinning as being an even aged management technique that reduces the understory suppressed and intermediate sized trees. A commercially thinned stand retains the best dominant and codominant trees and has an increased average stand diameter after harvest. The FPA defines Selection as an uneven aged management technique that removes trees throughout the various age classes.

49CSAF supports Forest Thinning (Commercial Thinning and Selection) techniques within PACs 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 purpose and need of this project.

2. Salvage

[bull] The proposed salvage of insect-, disease-, drought-, and wildfire-killed trees lacks the site- specificity necessary to assess the potential impacts to the environment.

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). 49CSAF supports site specific prescriptions by the USFS Certified Silviculturist with IDT input.

49CSAF supports the planned fuelbreak network but does not support retaining the two largest snags in the outer zone of the fuelbreak. These snags may act as torches that spread fire and pose a threat to fire fighters and equipment. Leaving snags in firebreaks does not meet the fire control objectives. The Certified Silviculturist and IDT can develop a strategy for snag retention away from ridges, roads, homes, and infrastructure that can benefit wildlife, human health and safety, and meet the purpose and need.

3. DBH Limits and 4. Economics

A. The proposed DBH limits will leave stand densities too dense and structurally homogenous to effectively reduce the landscape[rsquo]s susceptibility to wildfire-, drought-, and insect and disease- related mortality.

B. The cutting and removal of trees greater than 30 in. DBH is not necessary to effectively treat the landscape.

C. The proposed DBH limits will impact the Forest[rsquo]s ability to provide timber (wood product) to local and regional communities and the likelihood of treatment implementation.

49CSAF supports creating diverse fire resilient timber stands by reducing their densities (e.g. basal area). The DEIS states that desired basal areas will be 100 to 150 square feet per acre (sqft/ac). This may be too high in certain areas to meet the stated purpose and need. It may be necessary to harvest larger trees to create a condition where tree crowns are not interlocking and this condition may not occur at 100 to 150 sqft/ac. Also, maintaining such a high basal area will encourage shade tolerant (e.g., white fir, incense cedar) rather than the shade intolerant (e.g., ponderosa pine) conifer regeneration and not meet the stated purpose and need. The California FPA (14CCR 1052.4) allows down to 50 sqft/ac during emergency operations (14CCR 1052.4(e)) and allows for cutting large trees when objectives would not be met by leaving them (14CCR 1052.4(d)(1)(A)).

49CSAF has concerns that the light thinnings (based on diameter limits) and retaining high basal areas will result in PACs (and other areas throughout the project area) that are over-stocked again within 5-6 years and vulnerable to decline (e.g., insects, disease, fuel loading, etc.). Diameter limits used in last 25 years have created even-aged stands that can[rsquo]t be treated (based on current diameter limitations) since the trees average more than 30 inches in diameter. These even-aged stands become over-stocked, deteriorate, and no longer

meet CSO habitat. This may require the owls using that deteriorated habitat to move to lower elevations where the habitat is already occupied. This results in the project[rsquo]s purpose and need not being accomplished.

Therefore, 49CSAF supports no tree diameter limits (e.g., delete Alt 1, Table 12), or providing for exceptions, and allowing the USFS Certified Silviculturist with IDT input to determine the silviculture method and the tree sizes for cutting in site specific areas to meet the stated purpose and need.

5. Wild and Scenic River

[bull] The proposed vegetation treatments have the potential to impact the characteristics of eligible wild river segments and diminish their eligibility for future designation.

49CSAF agrees with the DEIS analysis (DEIS, p.72-76) that the proposed management will not impact eligible Wild and Scenic River segments.

6. Forest Plan Amendments

A. Delineating a circular territory could result in an insufficient quantity and quality of habitat conserved and protected for CSO as compared to home range core areas (HRCA).

B. CSO PAC retirement based on lack of occupancy will lessen protections for CSO compared to current management direction.

C. Allowing habitat quality reduction in up to 1/3 of a CSO PAC will lessen protections for CSO compared to current management direction.

The DEIS defines California spotted owl territories and allows for adjusting boundaries to be non-circular. 49CSAF accepts the SERAL DEIS and STF Forest Land and Resource Management Plan (LMP) directions for the CSO. 49CSAF believes proposed actions will benefit the CSO as well as numerous other environmental factors.

7. Temporary Roads

[bull] The construction of temporary roads that are not properly decommissioned lead to erosion, unauthorized cross-country travel by wheeled motor vehicles, and introduction of noxious weeds.

49CSAF supports appropriate road maintenance to all Forest roads (DEIS, 1.03), including decommissioning temporary roads and other rarely used roads that contribute to erosion and deterioration of water quality.

49CSAF does not support the 500 foot limitation for construction of temporary roads. It may be necessary to construct longer temporary roads to harvest timber in such a large project area. The on-site evaluation by loggers, USFS Sale Administrators, supported by various resource specialist can adequately protect the resource and meet the project[rsquo]s purpose and need.

8. Herbicides

[bull] The proposed use of herbicides to treat non-native invasive plants may adversely affect human health and the health and diversity of other native species.

49CSAF supports control of non-native invasive plants (DEIS, 1.04) and the assessment presented in the DEIS (DEIS, Cumulative Effects, p.89). Hand control methods do not generally succeed. California has approved

herbicide use and 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.

The DEIS appears to adequately assess herbicides. 49CSAF supports herbicide use for other reasons than controlling invasive plants, such as reforestation (not part of this DEIS) 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.

Other Comments

1. 49CSAF supports a vigorous and ongoing cultural treatment program (e.g., mastication, precommercial thinning, release, prescribed fire, etc.). Most cultural treatments require periodic maintenance, otherwise their benefits are lost within a few years or until desirable vegetation occupy the site. This program requires committed funding and resources to mitigate impacts and meet the purpose and need.

2. 49CSAF has a concern regarding qualified foresters to serve on the IDT and prepare site specific silvicultural prescriptions. 49CSAF is not aware of a Certified Silviculturist(s) on the STF. The following is an excerpt from the Silviculture Handbook; 2409.17:

80.3 - Detailed Silvicultural Prescriptions

A detailed prescription is a written document prepared or reviewed by a certified silviculturist that describes management activities needed to implement a silvicultural treatment or treatment sequence. The prescription documents the results of an analysis of present and anticipated site conditions and management direction. It also describes the desired future vegetation conditions in measurable terms as developed during stand diagnosis. The desired condition is a basis for treatment, monitoring, and evaluation.

49CSAF is confident in a USFS Certified Silviculturist providing essential professional information into the decision-making process and implementing on-the-ground practices. 49CSAF is very uncomfortable with any lack of forestry expertise with this process. It is important to ensure forestry expertise to help ensure both agency and public trust in this process.

If a Certified Silviculturist is not available, 49CSAF suggests that the USFS either hire or contract with a California Registered Professional Forester (RPF) or a SAF Certified Forester to work with the IDT and prepare site specific prescriptions. RPFs work on non-federal lands throughout California; meet educational standards; have passed a rigorous competency exam; have been subject to licensing and multidisciplinary team field reviews; are familiar with environmental review; and with working with loggers, landowners with varying objectives, and field crews. SAF Certified Foresters have passed a competency exam, receive required continuing education, and are used by some federal agencies (e.g., Natural Resources Conservation Service) to accomplish federally funded work.