



# CALIFORNIA FARM BUREAU FEDERATION

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August 13, 2020

[Comments Electronically Submitted](#)

Jason Kuiken  
Forest Supervisor, Stanislaus National Forest  
Attn: Social and Ecological Resilience Across the Landscape  
19777 Greenley Road  
Sonora, CA 95370

**Re: Notice of Intent - Stanislaus National Forest; California; Social and Ecological Resilience Across the Landscape Environmental Impact Statement**

Dear Supervisor Kuiken:

Thank for the opportunity to comment on the Notice of Intent to prepare an Environmental Impact Statement (EIS) for the Social and Ecological Resilience Across the Landscape (SERAL) project. California Farm Bureau Federation (Farm Bureau) members are directly impacted by the condition of our National Forests and strongly supports a landscape scale approach to increasing resilience to natural disturbances including fire, drought, insects and disease.

Farm Bureau is a non-governmental, non-profit, voluntary membership California corporation whose purpose is to protect and promote agricultural interests throughout the state of California and to find solutions to the problems of the farm, the farm home and the rural community. Farm Bureau is California's largest farm organization, comprised of 53 county Farm Bureaus currently representing approximately 34,000 agricultural, associate and collegiate members in 56 counties.

After reviewing the Notice of Intent, it is our understanding that the proposed treatments will take place within a 116,000-acre project area and consist of a prescribed fire, hand thinning, mastication, variable density thinning, and limited salvage of insect, disease, drought and fire-kill trees. These treatments are being designed to implement approaches consistent with the Conservation Strategy for the California Spotted Owl in the Sierra Nevada. Additionally, the project would also use a combination of control and restoration treatments to address invasive plant infestations on the forest.

Farm Bureau is supportive of the project purpose and need, which generally speaking, is to increase the landscape's resilience to natural disturbances such as fire, drought, insects and disease by both restoring forest structure and composition to its natural range of variation. The Stanislaus National Forest is a significant contributor to the wood supply for Tuolumne County wood processing infrastructure. To maintain the viability of this infrastructure and address increased tree density on the forest, it is essential that the Forest Service conduct a landscape scale SERAL project to increase fuels reduction. For this reason, we offer the following specific comments on the proposed action for your consideration:

Vegetation Management

In regard to *Table 4 (Page 11) – Diameter at breast height limitations, exemptions and other constraints pertaining to variable density thinning treatments*, Farm Bureau does not believe application of arbitrary diameter limits is appropriate to achieve the desired objective. Instead, we suggest the Forest Service

instead consider retaining the largest trees on-site that support the objective be retained. Additionally, reducing overall tree density in the Owl Protected Activity Centers (PACs) should be added as an objective as this would likely assist with reducing tree mortality within PACs.

#### Strategic Fire Management

While Farm Bureau is generally supportive of strategic fire management and appreciates the inclusion of roadside fuelbreaks and defensible space, we are concerned with the prescriptive nature in which fuel breaks can be achieved. Currently the proposed action includes the following:

*“All live conifers 30 inches DBH or larger will be retained, except to meet needs for equipment operability or safety. All montane hardwood trees 12-inch DBH or greater, and all oak woodland hardwood trees 8-inch DBH or greater are to be retained unless removal is required for safety or equipment operability. Continuous understory vegetation less than 8-inch DBH or 12 feet tall may be broken up into naturally appearing clumps or islands of varied size and shape.”*

The above language is immensely specific and again includes diameter limits that we believe will greatly reduce ability to create a functional, effective fuel break leaving rural communities at risk. Again, we recommend that the Forest Service instead consider retaining the largest trees to achieve the objective of creating a functional, effective fuelbreak.

#### Grazing

Currently, the proposal does not incorporate public lands grazing within the scope of the proposal. Livestock grazing not only benefits ranchers in rural communities, but it also provides important environmental benefits and can be a cost-effective tool for wildfire prevention. Public lands grazing can also provide additional services such as facility maintenance, road maintenance (such as culvert clearing), and trash removal. Public lands grazing permittees are also an additional presence on the forest, serving as fire lookouts, law enforcement attentiveness, and public outreach at a time of limited Agency funding and staffing. We recommend that the Forest Service consider the addition of public lands grazing as an available tool to improve landscape scale range conditions, fire reduction, and invasive species control.

Farm Bureau greatly appreciates the opportunity to comment on the proposed action and hopes that our input will further enhance the resilience of the forest landscape.

Sincerely,

A handwritten signature in black ink that reads "Erin D. Huston". The signature is written in a cursive, flowing style.

Erin Huston  
Federal Policy Consultant