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Comments: The SERAL ROD appears to be an exceptional job of management and foresight.

Three minor matters to be considered:

1 - FS/USDA has done research into pyrochar (biochar) and has found that this ingredient in forest as well as field soils is on the wane. See D. Dumroese or J Archleta, both OhDs and FS researchers. Biomass removal can be done with curtain burners, at least on an experimental basis, perhaps offering the biochar product from a curtain burner to the Almond industry for their orchards.

2 - The listed herbicides are endocrine-disruptors, and the FS is controlling pest plants with pest chemicals. FS research has indicated that fire can be used to control some invasive species. For more detail, talk to farm advisor Scott Oneto.

3 - thinning will likely bring about greater water yields in watersheds where prescribed fire has been used. The FS should plan research into the benefits of water yield transformations. The overmuch densities of trees on forestland wastes water, and though FS is federal, California State's constitution bars the waste of water. Over-treed acreages where wildfires have not been allowed to flourish countermands state law.