

Data Submitted (UTC 11): 2/3/2024 12:20:23 AM

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Organization: Amador County Board of Supervisors

Title: Chairman

Comments: REGARDING:

Standards for Management Actions Within Old-Growth Forest Conditions-(pg. 88047, Federal Register, 12/20/20230.

Standard 2(a)

Regarding: "Proactive stewardship activities shall promote one or more of the following":

i. " Amount, density and distribution of old trees, downed logs and standing snags

COMMENT: We should not be promoting greater density in the forests! Generally our forests have too many stems per acre, which is a major factor in the speed and intensity of stand altering fires which we are experiencing in the West. Forests in the West are too densely stocked which can lead to excessive mortality of old growth trees/forests from insect infestations, drought, catastrophic fires and climatic changes. Scientist Malcom North, who is doing great work, has made the case that increasing the density of forests beyond 35% increases tree mortality.

Outside of my duties as a County Supervisor, I work privately as a Tree Service (Oneto Tree Service) Last year (2023) I had a contract to cut hazard trees in the footprint of the Caldor Fire on the El Dorado National Forest, in the Sierra Nevada Mountains of California. The contract was administered by The Great Basin Institute, on behalf of the US Forest Service. Part of the contract was cutting fire killed hazard trees for approximately 20 miles adjacent to "The Historic Pony Express Trail" which parallels Highway 50, additionally, the contract included cutting trees on approximately 4 miles of "the Thunder Mountain Trail and Lake Margaret Trail". All in all we cut approximately 20,000 hazard trees, along 24 miles of trail, mainly in Old Growth type foresttwo things I noticed was the severely mortality (many areas 100% mortality) where the forest was overly dense or had an excessive amounts of downed logs and especially where it had both it became a high severity wildfire and the kill ratio was severe in all size class of trees.

Where trees were spread out with less small trees, ground fuel and downed logs, the kill ratio of trees was considerably less, especially in stands of larger class/old growth trees.

As to the Standard of: "promoting stand density" this SHOULD NOT BE A STANDARD", nor should it be a goal. The "Standard" should be reworded, "to protect Old Growth from severe fire and drought conditions".

Standard 2 (c)

Regarding: "initial threat analysis"

ii. "Initial Threat Analysis:

COMMENT: Initial Threat Analysis, should include: "the lack of thinning/controlled management burns leaves our forests vulnerable to high severity fires which have catastrophic effect on our forests, its Old Growth stand component and yes, even our local communities!" "We need to have active management, controlled burns and thinning of our forests to make them more fire resistant!"

Thank you,
Brian Oneto

Chairman
Amador County Board of Supervisors