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Comments: Thank you for providing an update to the FSM 2470 with multiple updates. I support many of the updates and applaud the efforts the FS has made to make these changes.

Specifically:

Page 24 of 66: In regards to the revised standards for initial certification for silviculturists (2471.51): please consider increasing the requirements in #5 to include an oral defense in addition to the completion of the task book and the documentation of the core competencies/national minimum standards. In my professional experience, as a certified silviculturist, the task book approach has not made certification a more efficient process, and it is harder for a panel to provide initial certification of a candidate without interaction with them. Having acted as both a peer silviculturist and a panel chair in region 6 - two panels have required additional work in the "new way" of certification. I have been a certified silviculturist since 2019 and was certified in the "old way" which appears to be more robust method of training and certification. As climate change and other complexities continue to be introduced, and as silviculturists are an integral part to our National Forests, I think maintaining a high standard of certification is a critical need. As such I do support the 5-year and 100-hour recertification timeframe described within this update. Please consider strengthening the national initial standards if the initial certification rate has not increased since incorporating the "new way". If National Standards are not strengthened, please add language allowing for oral defenses to be part of regional modules if RFs decide for that to be part of a regional certification or recertification standard.

Page 26 of 66: please clarify or specify a range of expected time when unplanned event with reforestation needs may occur when harvest did not occur (and the 5-year NFMA time frame does not apply). Also please clarify that a post-disturbance assessment of reforestation needs should occur within one year of a disturbance, to meet the annual needs reporting deadline.

Page 26 of 66: please consider future defining what "maladapted forests" are considered to be.

Thank you for better aligning and describing the range of assisted migrating and climate response options available in relation to climate change and reforestation. This is an absolutely critical piece to maintain within the FSM moving forward based on my professional knowledge as a FS silviculturist. This language gives managers more flexibility to better plan and adapt to rapidly changing climates. Without including this language Forests are currently woefully under prepared to adequately address climate change and seed shortages. Consider clarifying or adding additional language on how forests with seed shortages can get or collect cones from offsite/ of NFS lands (which is already ok) but could use additional language to help with future large scale seed needs from disturbances.

Please further consider how Forest Service may also address areas that are predicted to not have climate analogs or have very different future climatic envelopes that may not remain forested into the future in future FSM and FSH revisions.