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Comments: Please see attached comment letter.

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Comments in response to SERAL Project Proposal

To Forest Supervisor Jason Kuiken and the SERAL Planning Team:

Thank you for the opportunity to comment on the SERAL Project Proposal. Let me just begin by saying that our Group supports the implementation of more forest treatments across more acres to promote healthy forest structure and function. We recognize that these treatments will reduce the potential for increasing drought and beetle caused tree mortality as well as reducing the chances for widespread, severe wildfires. Following the lead of the Yosemite Stanislaus Solutions Collaborative, we sincerely hope that by minimizing or eliminating potential areas of controversy, the ultimate objective of increasing forest health in the Stanislaus N.F. will be realized sooner than later. Below are listed some of our primary comments and concerns.

1) The best, and most recent, science from forest service scientists (e.g. PSW) clearly indicates that obtaining healthy forest structure using Variable Density Thinning DOES NOT require the removal of large trees with dbh greater than 30".

There was some concern expressed in the virtual SERAL open house on August 5th that adherence to the 30" dbh limit would not allow effective implementation of VDT treatments. We respectfully disagree. We cite work by Dr. Eric Knapp and others at the Experimental Forest showing that removal of trees greater than 30" dbh was not essential to obtain their excellent results in the Experimental Forest. The evidence for this statement is found in a recent scientific paper (Knapp et al. 2020) that compared forest structure statistics among thinning treatments and un-thinned controls (See <https://www.fs.usda.gov/treearch/pubs/60297>). On page 222 in the article, the authors note that in the VDT treatment, only 0.3 trees greater than 30" dbh were removed per acre.

So essentially, on average, there was only one > 30" tree removed per 3 acres (an area about the size of three football fields). We find it hard to believe that the forest health goals of the VDT treatment in SERAL would not be realized if you spared this single tree! Given that a primary goal of the YSS/USFS collaboration is to reduce controversy, we find this result encouraging. By sparing the very uncommon >30" dbh trees during SERAL VDT treatments, the desired forest structure is obtained without disturbing the "hornet's nest" that exists around exceeding the 30" limit.

Given the results from this VDT study in the Experimental Forest, our Group does not support the removal of trees greater than 30" dbh in SERAL. Further, our Group strongly urges that SERAL follows the best science available. Please avoid the unnecessary (and inevitable) controversy associated with harvesting trees greater than 30" dbh in the VDT treatments.

2) Our Group does not agree with the proposal to cut trees up to 40" dbh to benefit rust resistant trees or aspen regeneration.

We would like to see the science that backs up the implicit assumption that a very small number of large trees significantly impacts rust resistant seed trees or the regeneration of aspen stands. Any scientific basis for this practice would have to be truly compelling given the likely controversy (see reference to "hornet's nest" above) associated with this substantial exceedance of current diameter limits.

3) Our Group does not support the construction of new temporary roads.

It is not at all clear why the already extensive system of existing roads could not be used to implement the variable density treatments. Unfortunately, there are already many examples of "temporary" roads in the Forest that were not properly decommissioned and have become erosion problems, unauthorized ORV routes, and prime locations for the introduction of noxious weeds.

If new roads are absolutely necessary, then the funding for proper, timely, and effective decommissioning of any new temporary roads should be guaranteed through the timber sales contracts. Decommissioning needs to occur within a two-year time limit. In addition, revegetation of the decommissioned roads with native plants is essential to reduce erosion and weed invasion.

4) Our Group would like to see a much more detailed plan on the use of prescribed burns as a stand-alone treatment in appropriate vegetation types.

Although we are encouraged to see that there is a focus on the use of prescribed fire in this project, we would like to see a better description of how a strong execution of this approach would be attained from the very start of the program. We understand the value of prescribed burns following VDT treatments, but we also believe that prescribed burns alone have an important role in restoring proper forest structure. Areas with open stands mixed with brush and oaks are vegetation types that could benefit greatly from prescribed fire. Although general areas for prescribed burns are in the project map, we would like to see specific sites designated with timetables for the execution of prescribed burns.

As we noted at the beginning of this response to the SERAL Project, our Group recognizes the need for increased pace and scale in the management of the Stanislaus National Forest in order to restore forest health and reduce the chance for catastrophic wildfires. We agree with the idea fostered by the YSS collaborative that this ultimate goal can be best obtained by undertaking projects that minimize controversy, and importantly, build trust between all the participants.

Thank you again for considering our comments on the SERAL Project.

Sincerely,

Dr. Kevin Rice, Ph.D. in Ecology

Conservation Chair
Tuolumne Group of the Sierra Club