



January 24, 2022

JASON KUIKEN, FOREST SUPERVISOR  
USDA, United States Forest Service  
Stanislaus National Forest  
19777 Greenley Road  
Sonora, CA 95370  
*Submitted via online portal*

**Attn: SOCIAL AND ECOLOGICAL RESILIENCE ACROSS LANDSCAPES (SERAL)**

Dear Supervisor Kuiken,

On behalf of Golden State Natural Resources, Inc. (GSNR), I write to offer GSNR's support for the United States Forest Service's (USFS) innovative and proactive approach to developing the SERAL project in coordination with local government, collaboratives, community members and stakeholders, and industry representatives. Specifically, GSNR supports Alternative 1 as the preferred alternative option as delineated in the draft environmental impact statement (DEIS).

GSNR is a nonprofit 501(c)(3), tax-exempt, forest resiliency company created in 2018 for the purposes of working to achieve forest resiliency and restoration on a large scale. GSNR includes dedicated partnerships of committed public and private entities with related expertise and resources as part of the solution in achieving forest resiliency. The GSNR project is committed to the vision of environmental and economic success for our forests, watersheds, wildlife, communities, and residents.

GSNR was created as a joint initiative of Golden State Finance Authority (GSFA) and Rural County Representatives of California (RCRC). Golden State Finance Authority is a statewide California Joint Powers Authority and has entered into a 20-year Master Stewardship Agreement with the USFS for all national forests in Region 5. GSFA's member counties contain most of California's forested lands, including more than 75% percent of the state's national forest lands and the Stanislaus National Forest boundaries are contained within GSFA member counties' jurisdiction. GSNR is also a member of the Yosemite Stanislaus Solutions collaborative.

California's rural counties have been devastated not only by the direct impacts of catastrophic wildfires on national forest service lands, but by the lingering, long-term effects of that damage.

County governments have long been engaged with USFS Region 5 and other stakeholders to help enhance efforts to restore fire resilient forests and fire adaptive communities.

GSNR supports and encourages the USFS to choose Alternative 1 as the preferred alternative for the following reasons which include (but are not necessarily limited to):

- Systematically treating large-scale landscapes through the use of Natural Range of Variation resulting in forests that are better able to withstand natural damage agents such as wildfire, drought, insect, disease and other environmental stressors while simultaneously enhancing watershed quality and wildlife habitat
- Utilizing the Owl Conservation Strategy to thin up to 100 acres in the most fire prone areas in California Spotted Owl protected activity centers
- Reducing wildfire risk in the WUI Defense Zone through the establishment of strategic fuel break networks to:
  - Protect communities located in High Hazard Risk areas prone to burning at High Severity
  - Keep wildfires smaller
  - Act as a boundary following fuel treatments to allow the reintroduction of prescribed fire
- Supporting the use of an Emergency Situation Determination for the immediate construction of ingress/egress fuel breaks in the most vulnerable, fire-prone communities
- Maximizing fuel treatment acreage and support of the removal of sawtimber and otherwise unmarketable biomass whenever possible to support economic development and local forest product industries
- Expediting salvage opportunities in areas affected by fire, drought, and insect mortality to maximize sawtimber and biomass value and enhance timely forest restoration efforts, including the rapid salvage in each HUC-6 watershed

Finally, GSNR strongly supports the expedited development and implementation of projects similar to SERAL across all 18 national forests for the aforementioned reasons.

GSNR greatly appreciates your consideration and the opportunity to comment on the SERAL project's DEIS. Please do not hesitate to contact me at [gnorton@gsnrnet.org](mailto:gnorton@gsnrnet.org) if you have any questions or would like to discuss further.

Sincerely,

A handwritten signature in blue ink, appearing to read "Greg Norton". The signature is fluid and cursive, with the first name "Greg" being more prominent than the last name "Norton".

Greg Norton  
President/CEO  
Golden State Natural Resources

CC:

Matt Kingsley, Chair, Golden State Natural Resources  
Patrick Blacklock, Executive Director, Golden State Finance Authority  
Kevin Cann, Vice President, Golden State Natural Resources  
Liz Berger, USFS Deputy Regional Forester

