



December 13, 2023

Jason Kuiken, Forest Supervisor
Stanislaus National Forest
USDA Forest Service
19777 Greenley Road
Sonora, CA 95370

RE: SOCIAL AND ECOLOGICAL RESILIENCE ACROSS LANDSCAPES 2.0

Dear Mr. Kuiken,

On behalf of Golden State Natural Resources, Inc. (GSNR), I write to offer GSNR's support for the USDA Forest Service's (USFS) innovative and proactive approach to developing the Social and Ecological Resilience Across Landscapes (SERAL) 2.0 project in coordination with local government, collaboratives, community members and stakeholders, and industry representatives. GSNR is a nonprofit 501(c)(3), tax-exempt, forest resiliency company created in 2018 for the purposes of helping to achieve forest resiliency and restoration at landscape 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 resiliency for our forests, watersheds, wildlife, communities, and residents. Specifically, GSNR supports applying a full range of landscape treatments that include logging, biomass removal, mastication of brush fields, creation of fuel breaks, broadcast burning, and various other treatments to reduce density of overgrown forests, and to provide for economic benefits by producing high levels of sawlogs, biomass material, and jobs for local workers who would create fuel breaks, do the logging and biomass removal, and other project treatments.

GSNR was created as a joint initiative of Golden State Finance Authority (GSFA) and Rural County Representatives of California (RCRC). GSFA 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 the USFS Pacific Southwest Region (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, including those in and around the Stanislaus National Forest, 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 proposed objectives in the SERAL 2.0 project which include, but are not necessarily limited to:

- Systematically treating large-scale landscapes by utilizing 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
 - Proactively treating hazardous fuels to further reduce the wildfire risk to various communities, iconic recreation sites and critical infrastructure as well as improve habitat for myriad aquatic and terrestrial species
- Reducing wildfire risk in the wildland urban interface areas to establish strategic fuel break networks that:
 - Protect communities located in High Hazard Risk areas prone to burning at high severity
 - Mitigate wildfire size and severity
 - Serve 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

Finally, GSNR strongly supports the expedited development and implementation of projects similar to SERAL 2.0 across all 18 national forests in Region 5.

GSNR greatly appreciates your consideration and the opportunity to comment on the SERAL 2.0 project. Please do not hesitate to contact me at sheaton@rcrcnet.org if you have any questions or would like to discuss our comments.

Sincerely,

A handwritten signature in black ink, appearing to read "Staci Heaton", with a stylized flourish at the end.

STACI HEATON
Senior Policy Advocate

CC: Jennifer Eberlien, Regional Forester, USDA Forest Service Pacific Southwest Region
Liz Berger, Deputy Regional Forester for Resources, USDA Forest Service Pacific Southwest Region
Members of the Golden State Natural Resources Board of Directors