



Sierra Pacific Industries

P.O Box 247 Standard, CA 95373 / (209) 532-7141

December 14th, 2023

Jason Kuiken
Forest Supervisor
Stanislaus National Forest
19777 Greenly Road
Sonora, CA 95370

Re: Social and Ecological Resilience Across the Landscape (SERAL) 2.0 Scoping

Dear Mr. Kuiken,

Sierra Pacific Industries (SPI) is a third-generation, family-owned Forest Products Company, based in Anderson, California with 14 sawmill locations and actively managed timberlands throughout California, Oregon, and Washington. The Sonora Division is the southernmost part of the Company's operations, and includes the Standard and Chinese Camp facilities, directly employing 300 local workers and numerous contractors. In addition to investments to our community, SPI has made significant investments into our facilities over recent years, including rebuilding the Chinese Camp sawmill in 2007 and the Sonora sawmill in 2011.

Background

Sierra Pacific Industries thanks you for the opportunity to comment on this project during the scoping stage. As is referenced in the scoping document, the Stanislaus National Forest is a direct contributor of forest products to our facilities, and the health and productivity of the Forest have a direct influence on our operations.

As with the first SERAL project, we emphasize our support for the SERAL 2.0 project and the purpose and need to increase resiliency across the landscape. We appreciate that the Forest is receptive to comments and has incorporated lessons learned from the first SERAL project into planning for SERAL 2.0. That being said, please consider the feedback below:

Use of NRV Targets and Thin from Below Silviculture

The use of NRV targets and the methodology behind it has been thoroughly discussed during YSS general membership and leadership team meetings. One issue that has been voiced in these meetings is the silvicultural methods used to reach said historical NRV targets, the majority of which prioritize the removal of understory trees. If the purpose of the SERAL project(s) is to create a more resilient forest, I would seriously encourage the project staff to consider that the removal of the majority of the understory could eventually leave the Stanislaus in an even more dire situation than it is in currently – full of large, decadent, dying, and even dead, trees, with no



regeneration to replace them. Considering the mortality events that the forest has seen over the last 13 years (more than 10 million trees,) and the likelihood that we will see more in the coming years, I would again encourage Forest and project staff to take a serious look at what the successional state of the Stanislaus will be with the use of this silviculture.

Salvage of Rx-Killed Trees

As is easily seen if one takes a drive up the 108 corridor through Strawberry, this season's prescribed burns burned too hot in some areas, and resulted in die-off. While some are waiting for the trees to "green back up," the reality for the majority of these trees is they will not survive. Immediate salvage of these trees would be best for the safety and health of the forest and all who enjoy it, as well as the merchantability of the trees, the FS is either unwilling or unable to salvage in these areas. The current scoping includes language about "wildfire" killed trees, and I suggest that the FS consider also including trees potentially killed during prescribed burn into this language. When much of your planned prescribed burning is "initial entry," it increases the likelihood for patches of hotter burns and tree mortality. Having a plan in place to salvage these trees would, as mentioned earlier, maintain the health and safety of the forest and its visitors, as well as ensure the merchantability of the timber.

Conclusion

As mentioned earlier, Sierra Pacific Industries appreciates the opportunity to comment on this project and commends the Forest Service for their efforts to increase the resiliency of the Stanislaus. We look forward to seeing the next stages of this project with the consideration of the above input.

Sincerely,

Hannah Grabowski
Sierra Pacific Industries – Sonora Division
Procurement Forester