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| Left Coast Land Clearing |
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December 17, 2023

Jason Kuiken

Forest Supervisor

Stanislaus National Forest

19777 Greenley Road

Sonora, CA 95370

Dear Supervisor Kuiken and Stanislaus National Forest staff:

Thank you for the opportunity to provide input on the Social and Ecological Resilience Across the Landscape 2.0 (SERAL 2.0) project. Left Coast Land Clearing (LCLC/The Company) is a Tuolumne County based company and implementation partner for fuel-reduction projects throughout the central and southern Sierra Nevada region. The Company and the people within are grateful for your willingness and drive to push the envelope and for the efforts undertaken to create such a large-scale plan to adequately increase resilience to fire - on the path to bringing the forest back within the natural range of variation (NRV).

LCLC agrees with the direction that the Stanislaus National Forest (SNF) is going as it relates to the variety of forest treatments proposed and is glad to see good science being used to drive decision-making. When comparing The Company’s experience on the ground, with the language of the scoping package, there are a few points of concern. These concerns will be laid out below and The Company wants to encourage the SNF to consider these issues as it finalizes its decision on the final SERAL 2.0 suite of treatments.

1. In line with 1.03 Provide Economic Opportunities, the SNF would be wise to consider the long-term impacts of the proposed suite of treatments on future removable sawlog volumes that keep local milling and other end-use infrastructure in place. There are a couple key points that are compounding to risk future sawlog volumes. These are the removal of much of the understory, and the continuation of enforcing diameter limits that are not now, nor have they ever been backed by science. Harvest diameter limits are already leading to timber purchaser’s being turned away at times due to the Chinese Camp small-log mill being too full, which is a product of FS timber sales skewing too far toward removing lower diameter class conifers. If the Forest Service continues this trend of removing only trees under 30” DBH in most cases, AND masticating/burning those trees under 10” DBH, it is inevitable that you will manage yourself out of a viable timber program. This is a serious concern that LCLC and the broader forestry community have voiced over the years and the FS truly needs to analyze and act to remove/increase diameter limits.

These diameter limits came to be in an effort to protect old-growth forests and to preserve spotted owl habitat – both of which are important to protect. To that end, recent science has emphasized the importance of “edge habitat” for foraging owls (Fettig 2012; USDA 2019). Edge habitat being an area where a forest type change occurs, i.e. the boundary between a mature stand and a patch of forest at an earlier stage of succession. This body of knowledge should open the FS up to a willingness to create gaps by removing higher diameter overstory trees in strategic locations, with the intent of increasing spotted owl viability and pushing forest succession in a direction that ensures future timber volumes.

Residual stand density index (SDI) and basal area (BA) should also be strategically reduced further than the current plan, to spur on forest succession.

The constraints spoken about above, when implemented, often result in a forest that maintains a connected canopy across large areas of the landscape which is one of the symptoms of fire risk that these projects aim to address.

1. In Table 9. Fuelbreak Prescriptions, it is stated to retain ALL healthy sugar pine without evidence of blister rust or beetle attack. Previous projects have included a 4” diameter threshold where trees less than 4” diameter were treated. The previous language is more practical during implementation, as saplings are often difficult to see/save. Please consider sticking to the previous language.
2. 2.06 Broadcast Burning – LCLC urges the SNF to consider the need to be good stewards of taxpayer funding when planning broadcast burning, being careful to not allow overlap of burning and fuel-reduction projects which significantly increase cost per acre to achieve vastly the same goal as fuel-reduction treatments alone. This should be simple enough to do by ensuring that departments are communicating to understand how their respective projects line up against each other across the landscape both spatially and temporally.

In SERAL 1.0 and Phase 2, there were numerous acres that were slated to be treated by mastication for less than $2,000.00/acre, that were also burned at a FS stated cost of $3,500.00/acre. In the case of Item #6, this resulted in a tripling of the cost to yield essentially the same result as would have been seen if the FS had only paid for the mastication. These instances should be viewed as an unacceptably reckless spending of taxpayer funding.

1. Lastly, LCLC encourages the FS to work with the regional office to redefine what a standing-dead hazard tree is. The current definition does not allow for felling of trees that have just one green needle on them, even though they are clearly going to die and become a hazard after contractors have left the area. In the interest of public safety, contractors should be given the latitude, in communication with FS and TRT project managers, to mitigate these future hazards while on-site. This simple action will save money and reduce risk to human life and forest infrastructure.

Thanks again for the opportunity to participate in the public scoping period for this important project. Keep up the good work!

Sincerely,

Jeb Brooks

Registered Professional Forester

Left Coast Land Clearing