



Sierra Pacific Industries

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

October 28th, 2024

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

Amy Reid
Acting Forest Supervisor
El Dorado National Forest
100 Forni Road
Placerville, CA 95667

Re: Mokelumne Amador Calaveras (MAC) Forest Health and Resilience Project Scoping Notice

Dear Supervisor Kuiken and Supervisor Reid,

Sierra Pacific Industries (SPI) is a third generation, family-owned forest products company. The company is based in Anderson, CA, and consists of 14 sawmill locations as well as 2.4 million acres of actively managed timberlands in California, Oregon, and Washington. The Sonora division is the southernmost division and includes the Standard and Chinese Camp sawmills, which employ 300 local workers as well as numerous contractors. Lincoln Division neighbors Sonora Division to the north. SPI has made significant investments to both the community and its facilities including the rebuilding of the Chinese Camp mill in 2007, the Sonora mill in 2011, and the Lincoln small log mill in 2023.

Sierra Pacific Industries appreciates the opportunity to comment on the MAC Forest Health and Resilience Project. We would like to emphasize our support for the MAC Project, as well as the purpose and need to increase resiliency in both local forests and communities, with the consideration of the following comments:

Proposed Action

Forest Thinning

Sierra Pacific Industries supports the decision to implement forest thinning throughout the landscape to increase resiliency to disturbance. This document does a nice job of describing what types of thinning treatments may be utilized, but lacks specificity as far as methods,



prescriptions, acreages, and other pertinent details necessary to understand the scope of this project. As such, we'd like to provide the following feedback for further development of the MAC project.

The intent as described in the scoping document is to use thin-from-below methods to treat stands within the project area. We recommend that the Forests consider removal of not only small understory trees but also incorporate removal of large trees as well. If the desired goal of this project is to improve forest heterogeneity, this would include not just variation in species composition and structure, but age class as well. While the removal of understory trees is important in reducing the overall stocking of the stand, we encourage the Forests to also consider what the successional state of the forest will be in the years and decades following treatment. The product of thin-from-below treatments is a generally even-aged stand consisting of late-stage successional trees that are more susceptible to drought (Bennett et. al 2015) and other disturbances. As the climate trends more towards warmer, drier conditions over time, the risk of large-scale mortality events in such a stand increases. With little to no understory present after thinning-from-below, forests risk having little to no regeneration in the face of a large-scale disturbance. Therefore, we recommend the removal of large trees in conjunction with small trees to promote uneven-aged, heterogeneous stands that will be resilient against a range of disturbances.

Prescribed Fire

Prescribed fire is a valuable treatment to reduce surface fuels when implemented strategically and in conjunction with other treatments such as thinning or mastication. SPI recommends treating stands with the aforementioned treatments prior to putting fire on the landscape to reduce the likelihood of high severity fire. When fire is reintroduced to a landscape that has been subject to decades of fire suppression and lack of management, there is a higher fuel load and higher possibility for widespread mortality in trees due to high severity burn. Even in mature trees, if the cambium is scorched and the tree's vascular tissues are negatively impacted, it is only a matter of time before that tree faces mortality.

Additionally, SPI encourages the Forests to use silvicultural methods that lend the stands being considered for prescribed burning to a heterogeneity of both species and age class, as mentioned previously. If prescribed fire is put in a stand that was previously treated to a lower basal area with an uneven-aged structure, prescribed fire as a tool would serve its purpose as intended without resulting in undue mortality.

Hazard Tree Removal

The scoping document describes the removal of hazard trees along roadways, recreation areas, access routes, and other critical infrastructure, but lacks consideration for abating hazard trees



that are a product of prescribed burning. It is crucial that the Forests consider the likelihood of high severity fire during prescribed burns, and the resulting mortality of trees within the project area. As has been observed during recent local prescribed burns, pockets of high severity burn are possible and the Forests should have a framework in place to address the timely removal of the killed trees. As is spelled out in the scoping document, the removal of forest products is a key part of the functionality of the MAC project. Therefore, to forego a loss of merchantability, funding, and overall opportunity to fulfill the purpose of this project, we recommend that the Forests include the removal of recently dead hazard trees in prescribed burn areas as a part of this project.

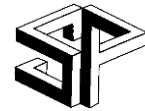
Fuel Break Construction

SPI encourages the use of strategically placed fuel breaks to protect communities and aid in the suppression of wildfires. We encourage the Forests to also consider thinning stands adjacent to fuel breaks to a low residual basal area to bolster the efficiency and effectiveness of said fuel breaks. For example, on a local project in the Sonora area, stands adjacent to fuel breaks were thinned to a residual basal area (RBA) of 140, and alongside project roads, conifers were thinned 250' on either side of said roads. This prescription created conditions that will prove ideal for accessibility, safety, and operational advantages in the event of a wildfire. In addition to treating surrounding stands, SPI recommends that the Forests implement wider fuel breaks based on wildfire behavior over the last decade. During the Caldor Fire in 2022, spot fires were observed almost a mile ahead of the flame front. A wider fuel break would lend itself to a larger area in which fire could be directly attacked and spot fires could be easily identified and fought.

Additionally, SPI encourages Forests to utilize any existing network of fuel breaks on both private and public lands by ensuring that any planned fuel breaks in the MAC project are strategically placed to ensure connectivity with existing fuel breaks. An excellent example of this is the work done by the team designing the SERAL project on the Stanislaus National Forest, that connected new fuel breaks with existing to create a network that serves for the safety and resiliency of both the forest and local communities against wildfire.

Management Requirements - Botanical Resources

This document mentions treating stumps with a borate compound to stop the introduction or spread of Annosus root disease within White fir stands. While SPI recognizes the importance of reducing occurrences of Annosus, we also recognize that application of these treatments can be costly and recommend that stump treatments be limited to areas and species (White fir) that are particularly vulnerable to infection rather than the entire project area or all coniferous species within a stand.



Spotted Owl Listing and Protected Activity Centers

The U.S. Fish and Wildlife Service has proposed the California Spotted Owl (CSO) for listing as an endangered species. Within the scoping document, Table 4 discusses potential amendments to the Forest Plan regarding CSO but provides little details regarding what those amendments could be and how treatment areas within the MAC project may be affected. More details regarding how current surveys in the project area are, any contingency plans for changes resulting from the listing, and any other pertinent details (for example, replacement volume in the event of new PACs within treatment areas) are necessary to prevent significant setbacks following the listing of the CSO.

Conclusion

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

Sincerely,

Rian Jurado
Sierra Pacific Industries – Sonora Division
Procurement Forester

Hannah Grabowski
Sierra Pacific Industries – Sonora Division
Procurement Forester

References

- Bennet, A. C., McDowell, N. G., Allen, C. D., & Anderson-Teixeira, K. J. (2015). Larger trees suffer most during drought in forests worldwide. *Nature Plants*, 1(10), 1-5.
<https://doi.org/10.1038/nplants.2015.139>