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Comments: The text of our comments are in the attached letter

Associated California Loggers

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24 January 2022

Jason Kuiken

Forest Supervisor

USDA [ndash] Stanislaus National Forest

19777 Greenley Rd.

Sonora, CA 95370

RE: Social and Economic Resilience Across the Landscape (SERAL) project 56500

Dear Mr. Kuiken:

Representing the Associated California Loggers, we thank you for the privilege to comment on the draft EIS for the proposed SERAL project on the Stanislaus National Forest.

The Associated California Loggers (ACL) represent companies and individuals who harvest and transport materials for the forest products industry. Our members play a major role in the stewardship of California[rsquo]s public and private forests, and we are committed to the sustainable management of this renewable resource.

ACL offers several programs and services to promote the recruitment, safety, and continuing education of professional timber harvesters and related occupations. We advocate at the local, state and federal levels of government on laws and regulations affecting our members. We support polices that protect and strengthen our industry, and those that ensure the accessibility, productivity and health of California[rsquo]s forests.

We have examined and commented previously on your SERAL project proposal and provided both encouragement, support, and endorsement for the program. The entire company of forest purveyors has talked

about increasing [ldquo]Pace and Scale[rdquo] for many years. While we have seen small increases in the timber program of work across many forests and positive attitudes from USFS employees to increasing outputs, much more must be done on a greater scale and at a faster pace. The SERAL project outline suggests a real possibility to begin the next step toward achieving [ldquo]Pace and Scale[rdquo] in the near term on a landscape that is in dire need of restoration to the Natural Range of Variation. It currently deviates dramatically from what anyone would consider a healthy, fire resilient, drought resistant condition. For the most part, it has not had serious fire in that area for a century or more. So, this specific area has a real urgency associated with it and we applaud the SNF and its YSS collaborative partners for going after this project with some serious priority. It hopefully represents a beginning, a good start and transition to a bigger broader program that could truly meet the vision of [ldquo]Pace and Scale[rdquo].

While we think that this is a well thought through outline and proposal for action, the draft EIS has what we think are some serious flaws and frankly is a bit of a disappointment. The apparent ground rules as expressed in the draft EIS look like a pull back from the comprehensive demonstration that we expected from the original proposal description. We respectfully offer some serious comments not so much as to be critical but suggestions, in an effort, to make the whole project more workable and to increase its likelihood of success. We will restrict our comments and suggestions to Option 1 as it is the only choice that offers any promise of achieving a viable and healthy forest. In our opinion, it falls short of where we ultimately need to be when the project is done as outlined. First, some generic comments on the overall purpose and theme of the proposal and draft EIS:

Generic comments:

1. In the opening sentence of your Summary statement, you state that the SERAL project is a [ldquo]planning effort designed to restore forest resilience and the landscape[rsquo]s ability to persist with fire as a natural process on the Stanislaus National Forest.[rdquo]

We hope the SERAL project is more than just a planning effort. We expect SERAL to manifest itself into a real landscape demonstration representing the absolute best forest management given the real science as we know it today. Our image of success is an age diverse, species diverse, fire resilient and drought resistant forest. Additionally, SERAL does not represent the entire Stanislaus National Forest but only a small but significant portion of the forest so the design cannot achieve [ldquo]forest resilience [hellip][rdquo] on the entire forest, so the goal is a little overstated, but certainly a really good start on the broader vision..

2. In the [ldquo]Purpose and Need[rdquo] outline on Page 9, the draft EIS qualitatively mentions a list of items which the SERAL project hopefully hopes to accomplish. On the surface, all of these items are admirable and desirable as goals, but they need to defined and prioritized. In the process of applying these on the landscape, we may experience conflict between competing criteria. The specific parameters of concern will likely be somewhat different depending on the precise location for which they are applied. The real point is that it is easy to over constrain the operating parameters so the solution becomes a null space. For instance, we saw this happen on the Hemlock project in the Calaveras Ranger District when the prescription realized a conflict with (1) not cutting any trees greater than 30[rdquo] DBH and (2) meeting a defined basal area. There were too many large trees. Not cutting any large trees meant that the basal area targets would be exceeded [ndash] in some cases dramatically so. The solution was saving all of the large trees, so they were forced to cut everything less than 30[rdquo] DBH and still could not come close to the basal area part of the prescription. Which was more important? Problem in this case is we largely had a single species forest with Red Fire overwhelmingly dominating this portion of the forest. So for some areas of the forest, we created a single species, and largely single age forest with a basal area that was about 50% higher than the desired target. This may create several unintended consequences down the road like most of the forest will die of old age at approximately the same time at some point in the future. The point is that we do not want to knowingly create future challenges.

3. What does Success look like? No where in the document is the goal or definition of success clearly defined. This is essential if we will have consensus going forward. How are we to get on the same path as a YSS / SNF team if we do not have a common vision? There is some discussion of [ldquo]restoration[rdquo] but restoration to what condition. Since there is reference to the conditions as they existed roughly 150 years ago, we assume that is the restoration target? The forest condition of 100 to 150 years ago is reasonably well documented and while that cannot be duplicated, it could be approximated over time. We would suggest that we largely had an age-diverse, species diverse, fire resilient, and drought resistant condition at that time. Virtually all species were thriving so we had a robust and abundance of habitat as well. Much has happened over the last 150 years and the document blames the current condition on fire suppression and logging activities over that period. We think the causality is more complex than that over simplified supposition. We (in the broadest sense of the term) all need to accept some culpability for the current unhealthy condition of our forests. Fire suppression when the forest was still fire resilient clearly has a role. However, there was a point a reasonably long time ago when fire suppression became mandatory and was no longer an option. Logging practices may also have had a role but that is a little harder to understand in the context of the current overgrown condition. We clearly have not been doing enough forest management including logging to maintain our forest in a fire resilient and drought resistant condition. The evidence is clear that over at least the last 30 years or more, logging has dramatically decreased; and over 75% of our sawmills and wood processing infrastructure no longer exists. So, we would argue that public policy and forest management restrictions as imposed by the USFS have also played an increasingly dominant role in the deterioration of our forests. The results speak for themselves in the increasing frequency, intensity, and magnitude of wildland fires in California and the Western United States. Much of this restrictive management has been done under the guise of environmental protection while we suggest the forest condition has dramatically worsened. We have seen the increased susceptibility to both fire and disease. For example, we saw the recent bark beetle infestation kill more than 150 million trees in the Central Sierra Nevada during the recent drought. Much of this would have been avoided if the forest had not been so densely populated, which is a direct result of our collective poor stewardship.

4. In the Seral virtual public meeting via ZOOM on January 5, two things were said which need clarification. The Forest Supervisor said he would like to see the SERAL project completed in 7 years. If the plan is to treat the entire SERAL landscape and the draft EIS suggests it will not, that is less than 17,000 acres per year. We do not think that meets the concept of [ldquo]Pace[rdquo] that is needed for the Stanislaus National Forest ([ldquo]SNF[rdquo]) as a whole. We suggest that we try to make that pace significantly faster so that we get on a [ldquo]pace[rdquo] that will achieve a complete treatment of the SNF on a frequency roughly equivalent to the historical fire return interval. In general, this area has not had significant fire for 100 years or more, but we know what the natural fire return frequency has been much more frequent.

5. In the list of issues, many comments are directed at the California Spotted Owl (CSO) strategy. We point out that current policy as described in the USDA 2019 document on Conservation strategy for the CSO was obsolete before it was published. Current scientific thinking says Owls do not need massive untouched and overly dense land masses. Much smaller areas are better like 10 acres versus 300 and even then understory management can be done. CSO prefer tall trees. A few more points here are that recent wildfires have destroyed countless CSO PACs. The number at Rim Fire was something like 46. King Fire destroyed more than 50 PACs. WE are burning PACs at an increasing rate because we are not treating those areas or the areas surrounding them at the level needed. We would argue that the current [ldquo]conservation strategy[rdquo] actually promotes the propagation of wildland fire and puts the CSO population at more risk. Many of the remaining Owl PACs have not been surveyed in many years and may not even be occupied. The CSO should be revisited using real scientific data as published by Malcolm North, Scott Stephens and others. Many of these publications were available before the 2019 USDA document and more studies have come out very recently.

6. Since we are truly focused on the achieving a healthy and resilient outcome for our forests, we suggest that the recent paper titled [ldquo]Operational resilience in western US frequent-fire forest[rdquo] (Authored by

Malcolm P. North, Ryan E. Tompkins, Alexis Bernal, Brandon Collins, Scott L. Stephens, and Robert A. York) be used as a guideline for establishing forest density goals. We have heard Dr. North speak of the [ldquo]carrying capacity[rdquo] of the forest to support a healthy eco-system. He has suggested that our forests should be significantly below he Carrying Capacity. This new paper is suggesting that historical forests were at a relative SDI (Stand Density Index) of 23-28% of the maximum and that the SDI has increased 6 to 7-fold over the last 100 years or so and average tree size has been reduced by 50%. The suggestion is we reduce the SDI of our forests to a level where there is [ldquo]low competition[rdquo] as opposed to the states of [ldquo]full competition[rdquo] or [ldquo]imminent mortality[rdquo] which is the case in most areas including the SERAL footprint.

Specific items:

1. There are several references to staying specified distances from eligible wild and scenic river segments. For the short term we can do this, but the concept is counterproductive. First, only Congress can make designation of wilderness or wild and scenic. By operating under a strategy of avoiding areas that [ldquo]may be[rdquo] eligible for such designation, we are defacto giving them that designation now. There is lot of concern and discussion over how we treat these areas or not treat them. We need to consider what the long-term impacts of not treating or under treating them might be. We suggest that wildfire can propagate up our untreated stream, creek and river corridors and cause considerable damage to our watershed and wildlife habitat. Ultimately in keeping with our stated goals of restoration. all of these areas need to be treated and [ldquo]restored.[rdquo]

2. There is considerable discussion about roads and rules for roads. We suggest that roads are an essential tool to provide access to our forests for all of the legitimate reasons of public access. To do the work contemplated by this SERAL project, we will also need roads and not just temporary roads. Maintenance must be an essential part of this long-term program. So, we suggest that we eliminate the rules suggested in the EIS and design a road system adequate to do the job and to provide both normal and emergency access to the appropriate areas. These roads should be maintained for the long term program, so we suggest that they be hardened with rocked surfaces while avoiding erosion and making them more durable for our stewardship efforts.

3. In the discussion and specifications surrounding fire breaks, we are somewhat confused about the strategy of [ldquo]restoration[rdquo] while arbitrarily retaining the two largest snags per acre. WE have a dynamic forest which currently is outpacing our efforts and frankly our ability to keep up with the growth. WE are growing much more than we are taking out. WE are also burning up much more than we can deal with our salvage. Why would we leave much if any dead trees in our area of treatment, when latent fire mortality, more bark beetle activity and normal natural mortality will continue to build these dead snags back int our forest. We all know that all dead trees become hazard trees over time and that will limit public access as well as hamper future maintenance treatment. We also know that these snags often provide habitat for some species. The snags also decay and produce GHG as well as fuel for the next fire whether wildfire or prescribed fire. Let[rsquo]s rethink this criterion and consider the parameters on a case-by-case basis with the idea of not generating more future hazards than necessary.

4. The draft EIS puts what appear to be arbitrary limits on salvage of burned stands and the remaining patches of insect mortality. This makes no sense whatsoever. By limiting this salvage, we are simply leaving more available fuel and hazards in our forest complicating our future stewardship efforts. We suggest that this criterion be revisited to be consistent with the vision of restoration.

5. Reforestation is omitted completely. This was specifically mentioned in the Virtual meeting on January 5. WeE think ths omission is a bit premature when we are still looking at removing fire and beetle killed trees. Without some reforestation, we could be leaving large patches of open space which may not look like our image of restoration. This topic should be left open on a case-by-case basis for reevaluation.

We appreciate the opportunity to comment and to make suggestions in this process. We fully support efforts to restore our forests to a healthy condition and further encourage the SNF to put some real urgency behind this effort.

On behalf of the Associated California Loggers, I respectfully submit these comments and suggestions;

Randy Hanvelt
Consultant to ACL