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Comments:

Sierra Pacific Industries
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April 1, 2024

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

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

Dear Mr. Kuiken,

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 actively managed timberlands in California, Oregon, and Washington. The Sonora division is the southernmost division within the company and includes the Standard and Chinese Camp sawmills which employ 300 local workers as well as numerous contractors. SPI has made significant investments to both the community and its facilities included the rebuilding of the Chinese Camp mill in 2007 and the Sonora mill in 2011.

Sierra Pacific Industries appreciates the opportunity to comment on the SERAL 2.0 DEIS. The health and productivity of both privately and publicly managed portions of the forest have a direct impact on our facilities and the Stanislaus National Forest is a large contributor to forest products to our facilities.

As mentioned in our SERAL 2.0 Scoping response, we are supportive of the SERAL 2.0 project and the need to increase resiliency across the landscape. We support the Purpose and Need for this project and agree that action is necessary to address the current issues that the Stanislaus National Forest faces. Sierra Pacific Industries supports the implementation of Alternative 1 with the modifications listed below:

Use of Thin from Below Silviculture to Reach NRV Targets
As mentioned in our previous comment on the SERAL 2.0 Scoping document, we have concern about the silvicultural techniques being used to reach historic NRV targets. The methods mentioned in this document prioritize the removal of small understory trees. While this method does reduce the overall stocking of the forest in the short term, it creates a forest with little structural diversity or age class diversity. Keeping large, decadent, diseased, and dying trees and removing the younger generations of trees causes the forest to regenerate with trees that are not of the best quality. Forests treated with thin from below prescriptions are more susceptible to

insects and disease which is already an issue in our forests. Allowing some removal of trees in the >30" diameter class outside of aspen groves and meadows, along with thinning of some understory trees would increase the heterogeneity of the forest, increasing the overall resiliency. The methods currently being used may meet the objectives outlined in SERAL 2.0 in the short-term but pose issues when it comes to the longevity of the results achieved and the resiliency of the overall forest. We would suggest the forest takes this into account when determining what silvicultural methodologies that will be used during the project.

Salvage of Trees Killed by Prescribed Buring

SPI recognizes and supports the use of condition-based management approach to address the future need for salvage of insect, diseased, and burned trees. While we agree with the addition of language discussing the salvage of trees killed by prescribed fire in section 2.07 B, there are still some considerations to be made. WCON-13 states that the salvage of trees killed by prescribed burns may not occur until one year after the burning was implemented to prevent unintentional removal of living trees that could "green-up" following the scorching of their canopies. Green-up of needles is not an adequate indication of whether a tree is alive or dead, making the justification for waiting one year to salvage RX fire burned trees irrelevant. In a recent study by Partelli-Feltrin et. al., researchers studied the main cause of post-fire mortality in Ponderosa Pine saplings where they found that the cause of seedling mortality was due to death of the cambium and phloem rather than lack of photosynthetic material (Partelli-Feltrin et. al., 2023), indicating that presence of green needles does not necessarily mean the tree is viable. The study also suggests that even if a tree does survive after cambium and phloem damage, they rely heavily on root reserves for nonstructural carbon and once the reserve is depleted the tree often dies anyway (Partelli-Feltrin et. al., 2023). In cases where a tree does survive a high severity fire event initially, it suffers severe damage, increasing the susceptibility to insect and disease and decreasing the trees resiliency to future fire. Keeping these trees on the landscape does not align with the objective to increase landscape resilience to natural disturbances, nor does it make sense to use resources to remove fuels from the forest and then re-enter the area later to remove the dead and dying trees that resulted from the prescribed burn. We believe that there should be immediate salvage of prescribed fire killed trees to remove dead/dying trees from the landscape while it is still economically feasible. The removal of prescribed fire killed trees is important to maintain the health and safety of the forest for its visitors as well as ensuring the merchantability of the timber.

Conclusion

As previously mentioned, SPI 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 the project with the consideration of the comments above.

Sincerely,

Rian Land
Sierra Pacific Industries -- Sonora Division
Procurement Forester

References

Partelli-Feltrin, R., Smith, A. M. S., Adams, H. D., Thompson, R. A., Kolden, C. A., Yedinak, K. M., & Johnson, D. M. (2023). Death from hunger or thirst? Phloem death, rather than xylem hydraulic failure, as a driver of fire-induced conifer mortality. New Phytologist, 237(4), 1154-1163. https://doi.org/10.1111/nph.18454