

Data Submitted (UTC 11): 8/13/2020 7:00:00 AM

First name: Jeb

Last name: Brooks

Organization: Sierra Pacific Industries

Title: Division Forester

Comments: Thank you for the opportunity to comment on the SERAL project. We are pleased to see this project moving forward with common interests found among a diverse group of stakeholders in the Yosemite Stanislaus Solutions Group (YSS). Sierra Pacific Industries (SPI) is a third-generation, family-owned forest Products Company based in Anderson, California with 12 sawmill locations and actively managed timberlands throughout California and Washington states. The Sonora Division is the southernmost part of the Company's operation which includes the Standard and Chinese Camp facilities, directly employing approximately 300 local workers and numerous contractors. SPI has made significant investments into these facilities over recent years that includes rebuilding the Chinese Camp sawmill in 2007 and the Sonora sawmill in 2011. The Stanislaus National Forest (SNF) Timber Sale Program is a significant contributor of forest products to our facilities and has a direct impact on our ability to operate. The productivity of the Stanislaus land base plays a significant role in our ability to maintain our operations. SPI commends the Stanislaus National Forest for utilizing collaborative tools by partnering with the YSS group. This process helps to ensure that a diverse range of viewpoints and expertise has been taken into consideration as the forest moves towards a decision. The stated purpose of this project is to develop treatments that will bring the overall forest structure in the area back to its historic Natural Range of Variation (NRV), to reintroduce prescribed fire in kind and to promote community safety and economically viable forest management. It is very encouraging to see that the Forest Service is acknowledging how far departed the current forest structure is from its historic NRV; and acknowledging how it got to this point. Furthermore, it is encouraging to see an emphasis on incorporating new science and a willingness to create forest plan amendments in order to apply new science-based management approaches. Regarding the use of new science-based management approaches; we hope to see a high level of consistency with this idea, and a willingness to make forest plan amendments that circumvent historical constraints that are not based in science or seen as best-management practices. The overall message of these comments is to keep the specifications and constraints of these projects consistent with your stated purpose of utilizing new science throughout the planning, implementation and administration of projects meant to return the forest to its historic NRV. There are several instances where it appears that the forest is intending to impose arbitrary thresholds on vegetation management, salvage treatments and the building of roads. The imposition of arbitrary constraints is not based in science and would contradict your stated purpose. In the following paragraphs, several of these instances will be addressed along with suggestions for how science may be applied instead.

Proposed Action D: Mechanical Thinning Treatments

D.1 Variable Density Thinning

Post treatment density targets are to consider land designation, management objectives, forest type and other site characteristics, and will be measured by basal area (BA) and/or canopy cover. We recommend that planning and administration of projects be simplified to use basal area exclusively, except in California Spotted Owl (CSO) Territories. Canopy cover has a tendency to be rather subjective whereas basal area can be calculated objectively. Historically, when timber units are marked with canopy cover as a main objective, they are frequently left with too high a percentage of canopy cover which results in tree crowns encroaching on one another which is counter to the forest's objectives. Regarding basal area targets, they are meant to reflect the historic NRV and to anticipate a future NRV based on climate science. Considering climate data suggests that the climate is trending towards warmer and drier conditions, it would stand to reason that the forest landscape should require less water and shade over time. This idea promotes the stated objective of increasing the proportion of pine dominant stands and increasing average tree size. In order to achieve these goals, the forest will need to aim significantly lower than the stated basal areas found in Table 3: Desired structure within forested stands based on NRV. The stated ranges in the table look reasonable, however the figures in the parentheses need to come down. For yellow pine/dry mixed-conifer forest types, a BA target of "mostly less than 150" is stated within a range of 20-200. We suggest bringing this down to a target of mostly less than 100 square feet of basal area. This is more reflective of the historic NRV, reflects a more frequent, lower intensity fire regime (also higher resilience to wildfire), and allows the forest to require less water and shade in line with

climate science. This will also further promote the goal of having pine dominant stands with a greater overall tree size due to lessening competition. For the fir/moist mixed conifer we suggest planning to have these stands at mostly less than 170 square feet of basal area as opposed to mostly less than 200, for the same reasons. Moving on to Diameter at breast height limitations, we find a significant deviation from the stated objective of using new science. Inside Protected Activity Centers (PACs) there are two constraints of concern: a 20-inch DBH limit and an operational area limit of 1/3 of each individual PAC (approximately 100 acres). We are unaware of any science that supports either of these numbers, and both of them are counterproductive in relation to the stated objectives on the landscape. The 20-inch DBH limit is furthering the practice of deviating from historic NRV. This will lead to stands that are too dense to promote overstory pine growth, are not fire resilient and are not in line with the new CSO strategy which suggests that CSOs prefer taller stands with higher canopy cover in the overstory. Imposing a 20-inch DBH limit in these areas will promote the ingrowth of shade-tolerant species which goes against the desired condition for this project. Regarding PACs in general, it is encouraging to see a plan to retire unoccupied PACs. This will enable the forest to adapt better to changing conditions in the pursuit of achieving the SERAL project's goals. In CSO Territory, a 24 and 30-inch DBH limit is proposed for pines/Douglas-fir and cedar/true firs, respectively. Again, please keep any constraints limited to what can be backed with current, relevant science. These diameter limits can be significantly increased perhaps to 30 and 40 inches, respectively. These limits will allow, in many places, for projects to achieve the desired canopy cover for CSO habitat and will work the forest structure towards a more disturbance-resilient state. Regarding the continuation of the 30-inch DBH limit in the General Forest lands; it really is discouraging to see the SNF maintain this detrimental constraint. It has been widely acknowledged that the "30-inch Rule" is arbitrary, not based in science, and hinders Sierra Nevada forests from achieving desired management goals. Considering the very first bullet point under the SERAL project's list of purposes states that the forest will "Conduct landscape scale forest planning and active management while incorporating new science"; the 30-inch rule is the key thing that should not be included in this project. Imposing this rule will result in more of the same results as the forest has been seeing. Imposing the 30-inch rule leads to uneconomical projects and contiguous canopies through managed landscapes. Both of which are counter to the stated goals of the project. Regarding the two noted exemptions which enable trees up to 40 inches to be removed: we recommend removing that diameter limit entirely and enabling planners to simply remove the trees that are needed in order to achieve proper spacing (one tree length) from dominant and co-dominant shade-intolerant trees, especially around rust-resistant sugar pine. This same idea stands for the removal of encroaching conifers stated in D.2.D.4 Salvage of Insect, Disease, or Drought Killed Trees. The SERAL project proposes the cutting and removal of insect, disease, and drought-killed trees where they can support achieving the desirable forest structure based on NRV. The next sentence which limits this practice to within 0.25 miles of existing system roads, directly counters the goal of achieving the desired forest structure, and is another arbitrary limit not based in science. Please consider the vast areas of wilderness and designated roadless areas on the SNF when considering imposing these limits. A 0.25-mile limit as stated, will significantly limit the forest's ability to reduce fuel-loading of dead tree material as well as the progress towards achieving the future desired condition. We feel that it would be much better to treat as much of these areas as possible in order to reduce fuel loading and even to reforest these areas with the money generated from a broader treatment of acres that have suffered heavy mortality. D.5 Salvage of Fire-Killed Trees Again, we see arbitrary constraints that hinder the forest from achieving the stated goals of increasing resilience to wildfire and returning the forest to its historic NRV. We are unaware of any science that suggests a 500-acre limit should be imposed in a HUC 6 watershed. In looking at the example in Figure 2: Visual depiction of acreage constraints for the general salvage of fire killed trees: it appears that the SNF fully intends on having future burn areas go the route of the devastating Rim Fire in 2013. Considering the size of recent fires on the SNF, it appears as though the visual example is extremely optimistic at best. A fire is likely to be much larger in size than the 7,000 and 10,000 acre examples, but would still be limited to 500 acres per HUC 6 watershed. This is absurd and will only lead to more forest type change to shrublands, increased fuel-loading and an overall failure to bring the forest into the desired conditions. If these limits remain, the forest had better hope that it can truly shift towards a proactive management regime if it plans to have such limited reactive management regimes post-fire. In stand-replacing fire events, the forest should do everything it possibly can to salvage maximum acres

and use money generated from timber sales to reforest burned areas with the intent of setting those acres up for eventually meeting the desired conditions of achieving the NRV. Fuelbreaks, Prepared Strategic Roadsides, and Defensible Space We commend the SNF for planning to implement projects that will increase defensible space around high value resources and assets (HVRAs), strategic fuelbreaks and roadsides. This is great planning and is paramount in preparing the forest and local communities to better react to fire events. However, again we see the imposition of the arbitrary 30-inch rule. This is yet another case where arbitrary constraints hinder you from implementing science-based treatments in accordance with desired outcomes. This rule will lead to the forest continuing to have too much canopy connectivity which must be mitigated to achieve the desired state of resiliency to fire. Summary Again, we commend the forest for seeing the need to return the landscape to its pre-settlement NRV. You are on the right track towards managing proactively to mitigate stand-replacing disturbances and we hope to see the forest truly implement projects at a pace that will allow the landscape to be resilient to future instances of insect, disease, drought and fire. As can be seen from these comments, there is a clear pattern of deviation from science-based management due to the inclusion of arbitrary constraints, namely DBH, treatment area, and road construction. We strongly urge you to simply abide by your own stated purpose of using science to direct management towards desired conditions. Please utilize forest plan amendments in order to do away with arbitrary constraints that hinder project success. By doing away with these rules not based in science, you will be able to achieve the goals of fire resiliency, economic sustainability, community resilience and a return to historic NRV. By continuing the use of these arbitrary limits, the forest will not be able to achieve these goals. It really is that simple when it comes to project implementation on the ground. Thank you for the opportunity to be involved in this scoping process. We look forward to continued partnership and teamwork in managing the Stanislaus National Forest. Sincerely, Jeb Brooks
Sierra Pacific Industries
Sonora Division Forester