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Jason Kuiken

Forest Supervisor

USDA - Stanislaus National Forest

19777 Greenley Rd.

Sonora, CA 95370

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

Dear Mr. Kuiken:

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

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

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

We have examined your SERAL project proposal and wish to provide our encouragement, support and endorsement for such a program. The entire company of forest purveyors has talked about increasing "Pace and Scale" for an exceptionally long time, but it has been little more than idle words. The SERAL project outline suggest a real possibility to achieve "Pace and Scale" in the near term on a landscape that is in serious need of restoration to the Natural Range of Variation as it deviates for the most part 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.

While we think that this is a well thought through outline and proposal for action, we respectfully offer some serious comments not to be critical but, in an effort, to make the whole project more workable and to increase its likelihood of success. First some generic comments on the overall purpose and theme of the proposal:

1. In describing the overall purpose of the SERAL project, the concept of maintenance is not mentioned directly. We believe that if we are to achieve the forest resiliency in terms of drought resistant and a fire resilient landscape that we should be thinking about a lasting solution utilizing the best science, technology and existing knowledge available going forward. So, maintenance should be considered and included which means long term funding as well.

2. An additional purpose or goal should include \_the concept of improving the watershed performance. If in fact we can reduce canopy coverage in the process of restoring our forests, the science shows we should also be reducing the evapotranspiration and thereby increasing the amount of water reaching the ground and ultimately

in our streams, creeks and rivers. California should embrace this with the water issues the State faces and use this concept to justify and provide for a continuous stream of funding to support SERAL and other projects of a similar nature.

3. In the opening remarks of this proposal, it is stated" ... the most pressing and time sensitive need is to modify the existing landscape vegetation conditions which pose high risk to human safety, ... " We suggest that this sense of "urgency" needs to be a driving force behind how we face the challenges of accomplishing SERAL. Our current administrative processes do not support the idea of being able to do things quickly. The current schedule on this SERAL concept expects a ROD to be finalized in early 2022. While we understand that is a best estimate based on current processes, it does not reflect the needed urgency. When we get down to doing specific projects under the SERAL umbrella, we will need to be more time and cost efficient in the administrative processes.

4. Somewhere, we should probably define what success look like. While in any specific project that vision will vary based on the local conditions including elevation, slope, latitude, direction the area is facing and more; we think that success can be generically described in a fashion where we can generally agree conceptually and move forward with less discussion in the future and therefore save time. If we go back to the year 1900 give or take 20 years, we have a fairly good idea of what our forests looked like. This was a time before the so-called western European settlement influence had much of a serious negative impact. We did not have as many serious wildland fires. We were not generating new endangered or threatened species regularly. While we cannot precisely duplicate that circa 1900 forest, we can use as our initial goals to approximate those vegetation conditions and achieve much of our purpose and goals. So, this is just a suggestion as a guideline or vision to success.

5. In the purpose statement, it clearly asserts a desire to" ... incorporating new science ... and utilizing new tools enabling forest management to adapt to changing conditions and implement at a pace that will influence effective change on the landscape." We applaud this perspective as we must move forward with the newest confirmed scientific information and new technologies if we are to be successful. If this project is going to be successful and timely in making an effective change on a pace that will in fact demonstrate the results, we all expect; collectively, we will have to be open to new data, new technologies and new perspectives on old problems and issues.

6. In Section 1.03, the proposal discusses fire risks to the environment, communities, resources and the infrastructure. Uncontrolled wildfire and or prescribed wildfire which gets away from us may never go away totally and it will be some time before the probabilities are significantly reduced. The droughts and corresponding insect attacks will likewise be with us for some time. So, we will need to be prepared to deal with these disturbances for some time going forward. This adds to the urgency of the SERAL proposal. Until we collectively get to the point where we are removing more vegetation than is growing into our forests each year, we will still be on the losing end of this equation. So, we would suggest that fire fighting and fire management practices and guidelines be reviewed and possibly adjusted until the forest is ready for prescribed burns.

Now we offer some specific comments on the content and specifications mentioned in the proposal:

1. In the purpose and need section, item 4: we suggest that you make every attempt to engage and coordinate with the County, TuCARE, the 108 Fire Safe Council and adjacent private landowners to achieve a more effective result sooner.

2. In the purpose and need section, item 5: you suggest that we" ... manage the Forest in an economically efficient and cost-effective manner ... " We would suggest that this implies you would also promote and consider new technologies and innovative ways to make things happen. In that respect, some of the later comments in your document seemed to have ideas associated with limiting activities or prescribing limits on activities. For instance, there is a suggestion to prescriptively limit the skidding distance. Practically, this is of little consequence to most loggers but why not let the circumstances and individual project logistics determine that for economic

efficiency.

3. Variable density thinning, section D. I: Two points of concern here. First, you specify a desired range of basal area and canopy cover. Later you start protecting all trees in some areas of concern by limiting the DBH and not allowing the larger trees to be removed at all. While we all understand the general desire to maintain a certain minimum inventory of larger trees, these criteria may over constrain the problem and you may not be able to achieve the desired result. Few large trees in a small area can quickly overwhelm the basal area guidelines. We suggest that you use some of these simply as guidelines and not hard and fast rules so that the projects can and will achieve the desired result. The second point is that Dr. Malcolm North of the PSW Research Station has recently been speaking about the "carrying capacity" of the forest to grow and support trees and suggests that we should not be at that capacity limit. He further suggests that by targeting the forest at something less than the "carrying capacity" we can avoid the vulnerabilities to these fire and drought disturbances which are part of our purposes. It seems appropriate that we engage Dr. North and perhaps include his theories and suggestions where appropriate.

4. California Spotted Owl strategy: there is an apparent conflict between the concept of using the newest scientific information, data and methods and strictly complying with the Conservation Strategy for the California Spotted Owl in the Sierra Nevada (USDA Forest Service 2019). We already know based on recent studies by Dr. Malcolm North and others concerning the CSO that the old strategies included in that reference document are no longer valid. Dr. North suggests that 10 acres is more appropriate for a CSO PAC than the 300 acres supported by the 2019 document mentioned above. He further suggests that it is not large acreage but tall trees (greater than 157 feet) that are the key to CSO nesting sites. Even within the 10 acres some thinning can be done. This will be documented very shortly and should be considered in our theme of utilizing the newest and best science. The CSO needs to become fire adapted as we suspect it once was and its PA Cs also need to be fire resilient if we are to meet our purpose and goals in the SERAL Project. This can be discussed later in actual project implementation plans but we must have consistent application of the policy of using latest and best science available.

5. In section D.6 dealing with temporary road construction and use, we suggest that the specific projects define what roads are needed temporarily and which need to be kept for future management planning, prescribed fire or other maintenance activities.

6. Section 3.02 paragraph A. Fuel Breaks, Prepared Strategic Roadsides, and defensible space: Based on recent fire experience since and including Rim Fire, we have seen fire jump more than one mile. The conditions that allowed that to happen have not changed. So, we are suggesting than 500-foot-wide breaks, 250 feet on either side of the road may not be enough to be effective under current forest conditions. This criterion should be rethought. In addition, in paragraph A. I Inner Core, the idea of leaving vegetation along roadsides to discourage use by unauthorized vehicles seems to be in direct conflict with the roadside fire break concept. This roadside vegetation offers opportunity for fire starts. This is the WUI where most human caused wildfires are initiated.

With more time and effort, we could come up with more suggestions but that is not as important as helping this proposal move forward. ACL believes that SERAL offers a real opportunity to move toward pace and scale. Some of the concepts such as adapting to the newest and best scientific information available and embracing innovative ideas and technologies to tackle the means to the solution are clear positive strategies to accomplish the goals. It is for these reasons that ACL endorses the SERAL concept and offers to work with the USFS Stanislaus National Forest to accomplish this project with a sense of urgency.

Thank you for allowing us to offer comment on the SERAL proposal.

Sincerely,

ERIC CARLESON

Executive Director Associated California Loggers