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First name: Hannah

Last name: Grabowski

Organization: Sierra Pacific Industries

Title: Procurement Forester

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Jason Kuiken

Forest Supervisor

Stanislaus National Forest

19777 Greenly Road

Sonora, CA 95370

Re: Social and Ecological Resilience Across the Landscape (SERAL) Project Draft Environmental Impact Statement (DEIS), Project 56500

Dear Mr. Kuiken,

Sierra Pacific Industries (SPI) is a third-generation, family-owned Forest Products Company, based in Anderson, California with 14 sawmill locations and actively managed timberlands throughout California, Oregon, and Washington. The Sonora Division is the southernmost part of the Company's operations, and includes the Standard and Chinese Camp facilities, directly employing 300 local workers and numerous contractors. In addition to investments to our community, SPI has made significant investments into our facilities over recent years, including rebuilding the Chinese Camp sawmill in 2007 and the Sonora sawmill in 2011.

Background

Sierra Pacific Industries appreciates the opportunity to comment on the SERAL Draft Environmental Impact Statement (DEIS). The Stanislaus National Forest is a direct contributor of forest products to our facilities; the health and productivity of both privately and publicly managed portions of the Forest have a direct influence on our abilities to operate. As stated in the SERAL DEIS,

"The SERAL project area has become one of the last remaining unburned islands of public lands in the Sierra Nevada and sits adjacent to communities who rely on an intact, resilient, forest for their well-being and livelihood...[and] the Stanislaus National Forest has an opportunity to act quickly to prevent SERAL from experiencing the same fate" (p. 49).

We are pleased to see that the Stanislaus National Forest is making strides to improve the health and resiliency of the local landscape. The stated purpose of this project is increase landscape resilience to natural disturbances, specifically drought, insects, disease, and wildfire, by implementing treatments guided by the Natural Range of Variation (NRV.)

Sierra Pacific Industries supports the implementation of Alternative 1 with modifications as listed below.

1.01H - NRV-Based Salvage of Drought/Insect/Disease/Wildfire-Disturbed Areas

As is, the proposed action does not include the flexibility or site-specificity needed to ensure that the project goals and intentions can be effectively implemented.

According to the SERAL Purpose and Need for Action (1.01B), it is stated that an estimated 10 million trees have been killed in the STF since 2010, and tree mortality increased more than 100-fold between 2014-2017 (p. 13).

These 10 million dead trees alone are a threat to the health and fire-resilience of the STF; the NRV-based directions to disregard fire-damaged timber in areas of less than 10% of the landscape (equating to 11,900 acres) and/or insect or disease mortality occurrences that are up to 15% of the landscape (178,500 acres) does not account for the additional mortality (fire, insect, or disease) that will likely occur over the life of the SERAL project. This constraint impedes the regeneration of healthy, young trees, increases stand density, increases surface and ladder fuels, lowers overall carbon sequestration, hampers efforts to safely implement prescribed fire intervals, and is a direct contradiction of multiple SERAL project goals (1.01A, B, D, F, G).

Additionally, retaining disturbed areas that are up to 15% of the landscape can be seen as retaining hazard trees that could pose a health and safety threat to the public, specifically if they are in high-trafficked areas (trails, roads, campsites, etc.) As referenced in Section 1.03, "When trees pose a hazard, abatement is needed to maintain safe access and sustain multiple uses of National Forest System lands to best meet the needs of the American People" (p. 23).

We recommend that all mortality patches within the scope of this project be evaluated by an interdisciplinary team on a case-by-case basis to ensure that the treatment prescribed is indeed of the best and most appropriate management (including leaving some areas untreated.)

2.01 - DBH Limits

The diameter limit as set provides more implications than solutions for the goals set in the SERAL project. These traditional DBH limits set by the USFS decades ago were done so as a result of sociopolitical pressure and constructs; they have no silvicultural basis or backing. Furthermore, the silvicultural implications of the Forest Service's prohibition on removing large diameter trees is distinct, as decadent, broken-top, rotting trees are left in the stand simply because they are over the diameter limit.

When a lower quality, large diameter tree is left as a reserve tree, it actively takes away from the health of the stand (i.e., a large decadent Red fir that will continue to produce shade-tolerant Red fir trees that affect the regeneration of a healthy, heterogeneous stand.) Additionally, studies show that when pests and pathogens enter stands, they will target old, large diameter trees and kill them in groups, which increases the likelihood that said decadent reserve trees will contribute to an unhealthy stand.

We recommend that, if the diameter limit can/will not be removed, that an exception be included for the purpose of ensuring that large diameter decadent trees be removed from stands when appropriate, and that healthy, vigorous trees be selected as reserve trees.

2.01 - Fuelbreaks

While traditional fuelbreaks of up to 500' wide may have been effective historically, we recommend that the fuelbreak lengths be reconsidered with recent fire season behaviors in mind (the 2021 Caldor Fire had recorded spot fires up to a mile [5,280 feet] ahead of the fire front.) California has seen megafires that cross typical fuelbreaks as if they didn't even exist. We recommend that fuelbreak widths, when feasible, be increased significantly and be constructed alongside areas treated with thinning and/or fuels reductions. Specifically, fuelbreaks should be over 500' in strategic areas, including those that are close to the WUI, are otherwise considered difficult to access, or that would be considered especially valuable as staging areas for fire personnel in the event of wildfire (i.e. 250' of fuelbreak on either side of forest roads that are then bordered by areas that have been selected for other treatments.)

2.01 - CWE Analysis

We commend the direction proposed for any potential post-disturbance (fire or other) salvage response to occur while environmental planning and analysis take place. However, we recommend that the 7-year limit on salvage

of wildfire-killed trees be increased to 10 years, as NEPAs typically have a life of 10 years. We believe it would be most prudent to allow for work within the full duration of the NEPA.

2.03E - Vegetation Management

Clarification on slope limitations for slopes that are greater than 45% is needed; we want to ensure that tethered logging can still be utilized on a case-by-case basis when deemed appropriate by site conditions and an interdisciplinary team or specialist within the SERAL Project. While it is understandable that not every site is going to have perfect, or even ideal, operating conditions, we believe that efforts should be made to maximize the opportunities for treatment provided by the SERAL project.

2.03G - Salvage and Hazard Tree Abatement

Firstly, we would like to address the condition of retaining buffers of highly-disturbed forest along green forest edges to provide "potential owl foraging habitat in the short term" (p. 46). This condition is referenced as being derived from the USDA 2019 Conservation Strategy for the California spotted owl; however, upon investigation, there are conflicting statements within the aforementioned document that call into question the validity of CSOs using green forest edges along highly disturbed areas for foraging.

Within the USDA Conservation Strategy, it is recommended within Approach 1 that,

"When managing beetle-killed areas, retain some high-severity patches of beetle-killed trees to create edge habitats for foraging owls. Patch sizes should generally range between 0.25 to 10 acres and comprise less than 15 percent across the landscape (Fettig 2012), preferably in small clumps of 2 to 4 trees (Lyderson et al. 2013)" [p. 33].

This condition of patch sizes up to 10 acres and less than 15 percent of the landscape is referenced multiple times throughout the SERAL DEIS. However, this position is challenged by other studies' evidence:

"...studies did not detect a clear adverse impact on owls from timber harvest. Similarly, Irwin et al. (2015) found most harvests had no detectable effect on spotted owls, and the authors did not detect any site abandonment of occupied territories when less than 58 percent of an area was treated" (p. 11).

Similarly, another study referenced in the USDA Conservation Strategy mentions "occupancy of severely burned territories declined substantially, and severely burned areas were avoided by owls, even when foraging" (p. 10).

At best, the available research regarding CSO foraging habitat along forest edges is inconclusive, and should not influence any hard and fast decisions regarding salvage and hazard tree abatement along forest edges. We recommend that, at the least, a level of site-specificity be added to this condition to ensure that areas of disturbance within the SERAL project receive the most effective treatments as possible, including using previous information on pre-disturbance CSO habitat to make informed decisions on whether or not to exclude certain disturbed areas from treatment.

Secondly, we would like to address the condition that allows roadside hazard trees to be topped in an effort to create nest structure. In the USDA's document *The California Spotted Owl: Current State of Knowledge*, Susan L. Roberts asserts that "nest stands of California spotted owls typically have high canopy closure and cover" (p. 50). Within disturbed roadside areas where hazard tree abatement is planned, it is unlikely that canopy closure and cover will be at a level that is preferred by owls for nest trees. As referenced previously, studies have shown that owls tend to avoid habitat, even foraging, within severely disturbed areas. Additionally, if the objective of this condition is to avoid mechanical disturbance to potential nest trees, entering an already disturbed area to top a tree is still a mechanical disturbance, still leaves hazard trees along roadsides, which is a direct contradiction of the purpose and intent of the SERAL project.

Considering the likelihood that this method of treatment would likely not be effective for creating or maintaining owl habitat, and would likely deplete project resources unnecessarily, we recommend that the topping method be excluded as a roadside hazard abatement option.

Conclusion

We commend the efforts by the United States Forest Service, specifically the Stanislaus National Forest, on the SERAL project and believe that, if its resources and intent are fully realized and implemented, it will be a momentous improvement on the health and resilience of our local forest. As previously stated, we fully support Alternative 1 as written within the SERAL DEIS, with consideration of the modifications recommended in this letter. Sierra Pacific Industries appreciates the opportunity to comment and collaborate on this project.

Sincerely,

Hannah Grabowski
Sierra Pacific Industries - Sonora Division
Procurement Forester