

Data Submitted (UTC 11): 1/23/2022 8:00:00 AM

First name: Steven

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Organization:

Title:

Comments: Comments are in the attached file.

January 23, 2022

Jason Kuiken

Forest Supervisor

Stanislaus National Forest

19777 Greenley Road

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

(<https://www.fs.usda.gov/project/?project=56500>)

Comments submitted Electronically at: <https://cara.ecosystem-management.org/Public/CommentInput?Project=56500>

Dear Jason,

California Forestry Association (Calforests) is a trade association whose membership includes California sawmills, veneer mills, several biomass powerplants, and private industrial and non-industrial forest landowners. Much of the forest infrastructure in California is partially dependent on economically viable timber supply from Region 5's national forests.

Calforests incorporates by reference the comments submitted on the SERAL DEIS by Jerry Jensen (American Forest Resource Council (AFRC)) and by Hannah Grabowski (Sierra Pacific Industries-Sonora Division). Calforests will not reiterate any of the AFRC or SPI's comments.

Calforests comments on the SERAL DEIS are focused specifically on [ldquo]Desired Condition[rdquo] and the recent publication December 30, 2021, Malcolm North, Brandon Collins, etal. [ldquo]Operational resilience in western US frequent-fire forests.[rdquo]

(<https://www.sciencedirect.com/science/article/abs/pii/S0378112721010975>).

The North et al publication is the best I have seen to date in describing the stressed condition of the forests in the Sierra Nevada's where [ldquo]high-intensity wildfire, bark beetle attack, and drought[rdquo] (seven of the past 10 years) have dominated.

The publication goes on to explain their findings (p. 1) that [ldquo]relative Stand Density Index (SDI) for historical forests was 23-28 percent of maximum for the stands in the ranges considered free of (<25%) to low competition (25-34%). In contrast, most (82-95%) contemporary stands were in the range of full competition (35-50%) or imminent mortality (>60%).[rdquo] The authors argue that management practices should move to creating stands largely free of competition, which, of course, would mean a much lower stand density and a completely different description of [ldquo]Desired Conditions.[rdquo] To further illustrate the density issue, the authors point out that [ldquo]the historical dataset for the 1911 forests averaged between 12 and 28% canopy cover.[rdquo]

So Calforests asks the Forest to focus their attention on SERAL DEIS Appendix E: Using Landscape Condition Metrics and ForSys and specifically, the identification of [ldquo]landscape resilience[rdquo] within the [ldquo]landscape condition metrics[rdquo]. Page, 8, Silvicultural Prescription Descriptions are the key elements that are not fully aligned with the findings of the research publication mentioned above.

Examples of not being fully aligned include but are not limited to SDIs of 100 and 150-200; canopy cover of 30%, 40%, and 50%, and diameter limits.

Though Calforests is not an expert on the modeling and use of ForSys, we suspect that a major adjustment to the Silvicultural Prescriptions to much lower densities will cause a major change to all the modeling. Further, there could be a need for significant adjustments to constraints.

Calforests asks you, Jason, to seriously consider the value and implications of the North etal publication to the SERAL project and ask that you build a new Table 1. Silviculture Prescription Descriptions aligned with the North etal publication.

Thank you for the opportunity to comment.

Sincerely,

STEVEN A. BRINK

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Enclosure

December 30, 2021, Malcolm North, Brandon Collins, etal. [ldquo]Operational resilience in western US frequent-fire forests.[rdquo]

(<https://www.sciencedirect.com/science/article/abs/pii/S0378112721010975>)

The 9-page publication can be obtained directly from one of the authors.