



BlueRibbon Coalition / Sharetrails

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Stanislaus National Forest

Attn: SERAL

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Sonora, CA 95370

BlueRibbon Coalition/ShareTrails (BRC) is writing to provide feedback for the Social and Ecological Resilience Across the Landscape (SERAL) project that is proposed for Stanislaus National Forest (SNF). BRC is a national non-profit organization that champions responsible recreation and encourages a strong conservation ethic and individual stewardship. We champion responsible use of public lands and waters for the benefit of all recreationists by educating and empowering our members to secure, protect, and expand shared outdoor recreation access and use by working collaboratively with natural resource managers and other recreationists. Our members use motorized and non-motorized means of recreation, including OHVs, horses, mountain bikes, and hiking to enjoy federally managed lands throughout the United States, including those of SNF. Many of our members and supporters live in California or travel across the country to visit California and use motorized vehicles to access US Forest Service (USFS) managed lands throughout California. BRC members visit SNF for motorized recreation, snowmobiling, sightseeing, photography, rockhounding, hunting, fishing, wildlife and nature study, camping, observing cultural resources, and other similar pursuits. BRC members and supporters have concrete, definite, and immediate plans to continue such activities in the future.

### **General Comments**

We support any additional comments that encourage the USFS to maximize the total acreage for restoration of forest resilience and health and catastrophic wildfire prevention by SERAL through implementation of Alternative 1 of the proposal. We strongly advocate against the "conservation alternative," Alternative 2, as this area of the Sierra Nevada mountain range is at severe risk of catastrophic wildfire and mitigation efforts are

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urgently needed. We recommend that the USFS dismiss Alternatives 3 and 4 as they both significantly minimize or eliminate many of the positive benefits of SERAL.

One of the biggest threats to the health and resilience of SNF today is catastrophic wildfire. In California, between 2020 and 2021, over 6.8 million acres were burned by catastrophic wildfire. Wildfire of this type decimates the landscape, incinerating full forests and every form of life that resides in it. As noted in the DEIS, SNF now forms a unique “island” of public land that remains untouched by catastrophic wildfire. It is now more important than ever to protect this area from this threat. SERAL is designed to reduce risk of catastrophic wildfire. Historically, naturally occurring fires were part of forest management. Over the last several decades, natural wildfire has been suppressed and an increased density of trees and underbrush have choked the land and created the perfect conditions for total destruction by catastrophic wildfire. SERAL will thin the forest from over-density of trees and brush to restore healthy balance and make the forest more resilient to survive future fires. Alternative 1 of SERAL maximizes total acreage for catastrophic wildfire prevention.

### **Outdoor Recreation**

The area of SNF contained within the boundaries of SERAL is a popular area of off-highway use and dispersed camping. It covers a large area of the Northern California Sierra Nevada mountain range. Multiple communities that are economically dependent upon the health of the forest and public access to outdoor recreation in the forest, lie inside or within close proximity to the boundaries of SERAL. USFS should work to maximize OHV use in this area, which can be achieved by ensuring that all current and newly created roads remain open and maintained for use following completion of SERAL. We do not support the post-project decommissioning of any roads that are constructed or improved for SERAL. NEPA requires agencies to consider a range of viable alternatives, and the recreation interest in SNF justifies the inclusion of analysis of impact on public access to outdoor recreation as a component of the DEIS. In its current form, the DEIS does not provide adequate socioeconomic analysis for the direct social and financial impact on organizations like ours if the agency were to decommission roads, or adopt Alternatives 2, 3 or 4. We ask the USFS to incorporate impact on outdoor recreation as a component of the final project plan.

### **Users with Disabilities**

We recommend that the USFS use this SERAL project to finally begin to reverse its decades-long systematic discrimination against those with mobility-impairment-related disabilities. The USFS has committed to manage our public lands for public benefit. Forest closures that eliminate or restrict motorized access create discrimination against people with disabilities. I believe that maintaining motorized access to public lands is critically important, as it provides a mode of access that persons with disabilities can use and enjoy.

On his first day in office, Biden issued an “Executive Order On Advancing Racial Equity and Support for Underserved Communities Through the Federal Government (EO14008).” This executive order established “an ambitious whole-of-government equity agenda” which focuses on addressing “entrenched disparities in our laws and public policies,” and mandates a “comprehensive approach to advancing equity for all, including people of color and others who have been historically underserved, marginalized, and adversely affected by persistent poverty and inequality.”

Under this executive order, “The term ‘equity’ means the consistent and systematic fair, just, and impartial treatment of all individuals, including individuals who belong to underserved communities that have been

denied such treatment, such as ... persons with disabilities....” Historically, there has been no group more greatly marginalized and excluded by public land management policies, and motorized travel management policies in particular, than people with disabilities. Outdoor enthusiasts with ambulatory disabilities frequently rely on motorized travel as their sole means to enjoy recreating on public lands. Not everyone has the ability to hike into a remote wilderness area, but many such people are still able to drive Jeeps, side-by-sides, and ATVs, which are restricted to the designated motorized route network.

Motorized access eliminates ableist bias in forest management policies, which aligns with the goals of EO14008. Management policies that focus on minimizing motorized recreation have caused significant decrease in public access in public lands over many decades; this has disproportionately impacted people with disabilities. In alignment with EO14008, we urge the USFS to advance equity in public access to SNF by removing policies that discriminate against those with disabilities. For SERAL, we ask that USFS preserve existing roads and trails, and conduct maintenance to retain all newly created roads and trails.

### **California Spotted Owl**

One of the core issues of concern cited in the DEIS is potential for controversy over disruption or destruction of habitat for the California Spotted Owl (CSO). As an organization that is centered on conservation and stewardship of public lands and resources, we share concern over protection of wildlife in SNF, including the CSO. We support Alternative 1 of SERAL because it will increase the number of acres of prime habitat for the spotted owl, thus ensuring that spotted owls may continue to thrive in SNF and may one day rebound so that they may be removed from endangered status.

In fact, the benefits of vegetation management and forest restoration projects for the CSO are well documented in scientific literature. One recent [study](#) published in *Frontiers in Ecology and the Environment* demonstrates that “restoring historical forest structure mitigates severe fire activity as the climate warms, particularly when restoration occurs in owl habitat. On average, benefits provided by restoration to owls (reduced severe fire) were found to exceed potential costs (direct habitat alteration).” When considering the risk of litigation from organizations that seek to eliminate forest restoration projects like SERAL, we encourage the USFS to leverage the preponderance of scientific data that demonstrates correlation between forest vegetation management projects and the health of CSO communities.

### **Social & Economic Impact**

One of the hallmark components of SERAL is its proactive inclusion of social impacts from project implementation. We advocate for consideration of social and economic impacts within USFS management policies, and commend SNF for diligence in centering elements of SERAL on social impact. However, the content within the DEIS that is specific to social impact is thin, at best. Additionally, economic impact is not adequately addressed, and we contend that social impact cannot be divorced from economic impact - socioeconomic factors of consideration are inherently intertwined. We therefore recommend that the USFS incorporate greater depth of analysis and consideration for socioeconomic impact in SERAL.

Part of the discussions that emerged from the public forum videoconference calls for SERAL that were held on January 5 and 13, 2022, focused on socioeconomic impacts. When asked how socioeconomic impacts would be measured, USFS representatives stated that measures would primarily focus on timber production and sales, stewardship by results contracts, and recreational use based on visitor use reports. USFS

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representatives stated that they find it difficult to define the net gain of socioeconomic impact from SERAL because of the complex and broad factors involved. USFS also stated that SERAL staff invite suggestions on how to measure socioeconomic impact.

A suggestion provided during the videoconference calls, that we reiterate in this public comment, is that the USFS should evaluate and weigh the value of potential loss of businesses, residences, tourism, and outdoor recreation from a catastrophic fire event. Given the extremity of catastrophic wildfire that has occurred in California within just the last 2 years, the prevalence of evidence to draw from to conduct this analysis is vast. Socioeconomic loss from catastrophic wildfire has both immediate and long-term impacts that ripple out from the local community to far-reaching corners of regional, state, and even national economies. Immediate, local impacts include loss of homes and businesses when structures burn, loss of jobs for those employed in local businesses, loss of total financial viability for those who own local businesses that are destroyed, and loss of infrastructure (IE: power, water, utility services, damage to roads and transportation) that impacts both those who do and do not suffer loss of homes or businesses from the fire. Long-term and broader-reaching local impacts include loss of economic viability across the community due to forest closures that halt public access, outdoor recreation, and tourism across the region from regular seasonal ventures such as camping, hiking, hunting, fishing, foraging, OHV and snowmobile excursions, and related activities.

When considering the broader range of impact beyond the local communities where a fire incident occurs, costs continue to mount quickly. Catastrophic wildfire is the attributed cause of an [estimated \\$150 billion in financial loss in California in 2020](#). In addition to the immediate forms of loss as noted above, this estimate also includes economic losses related to highway closures, evacuations, increased insurance premiums, firefighting costs, flight cancellations and health effects by hazardous air conditions.

The Rim Fire of 2013 was noted as an incident of reference when discussions centered on socioeconomic impacts during the SERAL videoconference calls. As cited in an [article in Wildfire Today](#), the financial impact of the Rim Fire included “structures burned, crops and pastures ruined, economic losses from decreased tourism, medical treatment for the effects of smoke, salaries of law enforcement and highway maintenance personnel, counseling for post-traumatic stress disorder, costs incurred by evacuees, infrastructure shutdowns, rehab of denuded slopes, flood and debris flow prevention, and repairing damage to reservoirs filled with silt.” Mitigating fire danger through more forest thinning can reduce the risks of catastrophic wildfire and the extremity of socioeconomic impact that they cause. The 2013 Rim Fire in California caused \$1.8 billion in environmental and property damage, or \$7,800 an acre. According to fire ecologist Robert Gray, “We can do an awful lot of treatment at \$7,800 an acre and actually save money.”

We encourage the USFS to seriously, carefully, and thoroughly evaluate the potential socioeconomic impacts of catastrophic wildfire when considering selection of Alternatives 1, 2, 3 or 4 for SERAL. The USFS carries the weight of responsibility for potential negative socioeconomic impacts, as the USFS also carries the responsibility of managing public lands within SNF. There are many private citizens who, as residents and business owners within the SERAL project boundaries, advocate for effective vegetation management and would in fact take part in thinning trees, underbrush, deadwood, and excess biomass if it were permissible for private citizens to do so. Whereas SNF is USFS managed land, the USFS bears responsibility for vegetation management and bars private citizens from implementing such projects independently. With widespread understanding of the value and critical need for effective vegetation management within SNF, a choice to not implement this project (Alternative 2), or to implement a version that significantly minimizes the benefits of

catastrophic wildfire prevention (Alternatives 3 and 4), could be assessed as an act of intentional or gross negligence by the USFS.

Of equal importance to assessing the potential socioeconomic loss from catastrophic fire, is assessment of socioeconomic gain through implementation of vegetation management projects like SERAL. Indeed, SERAL bears potential to create significant socioeconomic and ecological impact if outcomes are maximized through implementation of Alternative 1. The DEIS correctly and clearly demonstrates that the landscape within SNF has become severely overgrown with an excess of trees, underbrush, deadwood, and other biomass. This is an issue that has developed over many decades, and thus, the core factors are fully understood. If SNF may be restored to healthy and resilient status, it is critical to resolve over densification through logging, salvage, and removal of excess timber and deadwood. Congressman Tom McClintock correctly stated in a [presentation](#) to support The Resilient Federal Forest Act of 2015, “There’s an old adage that excess timber comes out of the forest one way or the other. It’s either carried out, or it burns out.”

In fact, excess timber has not been effectively removed from federal forest lands for over 30 consecutive years. As noted in an [article](#) sharing critique of the role of extreme environmentalism as a direct causal factor for extreme wildfire in California, from 1960 to 1990, 10.3 billion board feet of timber were removed from federal forest land each year. From 1991 to 2000 that number dropped to 2.1 billion board feet of timber per year, and has [remained at an average of about 2.5 billion board feet per year](#) from 2000 to 2021. Simple calculations quickly demonstrate how the dramatic decrease in removal of timber from federally managed land for over 30 years has contributed to overly dense, fire prone forests.

Removal of excess timber would stimulate socioeconomic health in the communities that lie in and nearby SNF through growth in jobs and commerce. Forestry and outdoor recreation represent vital components of the economy in the communities that are local to SNF. [In 2020, national GDP from the outdoor recreation industry produced \\$374 billion](#). California takes the lead in financial value added by outdoor recreation over other states across the nation, contributing nearly 12% of the national total, equating to [\\$44 billion in GDP in 2020](#). Of that \$44 billion, \$1.2 billion is attributed directly to the forestry industry. We advocate for implementation of Alternative 1 of SERAL to maximize the broad socioeconomic benefits that this project will facilitate through timber harvest, salvage, and sale.

We would like to close by acknowledging the multifaceted approach that the USFS has taken in proposal for this SERAL project. It is commendable that the vested interests of stakeholders across many spectrums, including ecology, wildlife, recreation, industry, and community, have all been considered to some degree within the scope of intended benefits of this project. As such, we support Alternative 1 as it is the most effective option for implementation of SERAL. Alternative 1 will serve to restore the largest volume of forest acreage to healthy balance, maximize prevention of catastrophic wildfire, increase critical habitat for the Spotted Owl, increase social and economic welfare of local communities through enhanced safety and access for outdoor recreation industry opportunities, increase economic growth and sustainability for local communities through timber harvest, tree salvage, and other forest industry opportunities, increase public access to outdoor recreation, and decrease discrimination of disabled persons to access outdoor recreation. Alternatives 2, 3, and 4 minimize or eliminate all of the noted positive benefits of SERAL. We therefore urge the USFS to implement Alternative 1 of this SERAL project.

BRC would like to be considered an interested public for this project. Information can be sent to the following address and email address:

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Sincerely,

A handwritten signature consisting of the letters 'B' and 'B' in a stylized, cursive font, followed by a long horizontal line that extends to the right.

Ben Burr  
Executive Director  
BlueRibbon Coalition

A handwritten signature in a cursive font that reads 'Simone Griffin'.

Simone Griffin  
Policy Director  
BlueRibbon Coalition