



YSS

YOSEMITE STANISLAUS SOLUTIONS

October 2, 2019

Randy Moore, Regional Forester
USDA Forest Service
Pacific Southwest Region
1323 Club Drive
Vallejo, CA 94592

Dear Randy:

As you are aware, for years forest stakeholders of the local region have strongly supported fuels reduction, reforestation, and recovery treatments within the 257,000-acre Rim Fire. In sharp contrast to that broad agreement, a recent lawsuit was filed by out-of-area interests to attempt to halt on-going HUD-grant-funded treatments and to block future treatments.

It is the intent of this letter to make it clear to the U.S. Forest Service and to the court that the members of the [Yosemite Stanislaus Solutions](#) (YSS) collaborative group who are listed on this letter believe that continued implementation of Rim Fire recovery and reforestation treatments is important to the recovery of the burned forest landscape. We collectively oppose any halt to on-going project activities or any delays in planned projects.

The YSS forest stakeholder collaborative group is made up of highly diverse interests representing a wide range of differing priorities and perspectives on forest management. What has made YSS noteworthy is the fact that the stakeholder group succeeds by focusing on areas where there is consensus agreement. Forest recovery actions and fuel reduction treatments within the gigantic Rim Fire footprint are projects for which YSS has strong consensus agreement.

The lawsuit that has been filed in an attempt to block the use of HUD (NDRC) grant funds makes a number of claims that YSS believes are misguided or incorrect.

First, there is not “new information” that requires new NEPA analysis. The Forest Service and YSS members have consistently been aware that some units proposed for reforestation and fuel reduction do have various stocking levels of natural regeneration seedlings. The Forest Service works to avoid disturbance to the young conifers while still taking steps to remove a significant portion of the dead trees and down woody material that combine to create excessive fuel levels. Whether or not young conifers are now growing on treatment sites, the fuel reduction treatments are still needed as they were originally planned.

Second, the lawsuit contains incorrect information about wildlife and the value of the habitat being altered by on-going fuel reduction and reforestation treatments. For the black-backed woodpecker, (which is uniquely tied to freshly burned forest habitat), since the Rim Fire the Forest Service’s aerial detection estimates show over 9 million trees died from drought and bark beetles in the Stanislaus Forest. Another 160,000+ acres of additional wildfire habitat have been created by fires that burned

since 2014 on federal forest lands locally. Together the amount of snag forest habitat available for snag-dependent species is enormous, and there is no conceivable wildlife-based need for stopping fuel reduction treatments in the relatively small area targeted by the lawsuit.

Third, the lawsuit claims that analysis failed to consider the effects of “logging for biomass energy production, which includes clearcutting vegetation of all sizes, both live and dead...”. To correct that claim, biomass logging does not remove any medium or large live trees. Furthermore, the complaint incorrectly asserts that biomass logging to remove dead trees creates impacts that have not been adequately evaluated. The complaint fails to point out that the woody material on the project sites will either be pushed into piles and burned in the open in the forest, or the same woody material will be biomass logged, chipped, and burned far more cleanly at a biomass facility. There are less impacts, not additional effects, from biomass removal. The wood will be burned either way.

Last, the lawsuit incorrectly claims that the HUD Disaster Relief Act grant funds have been incorrectly utilized. In reality, the three HUD grant objectives were painstakingly developed through countless public meetings, written input, county sessions, and stakeholder input. The goal of the community centers, the biomass wood product campus, and the forest restoration and resiliency treatments was to benefit the social, economic, and environmental values of the affected Rim Fire region. YSS stakeholder members fully engaged throughout that planning process. There are no grounds for arguing that there are no disaster relief benefits from reforesting high severity burn sites within the Rim Fire or from fuel reduction treatments to reduce another devastating wildfire.

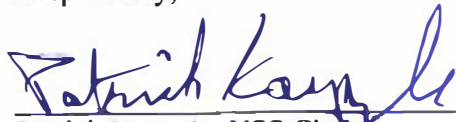
The YSS stakeholder collaborative group recognizes forest treatments can be seen from different points of view. But basic facts should not be misrepresented. The HUD grant-funded treatments within the Rim Fire are fully consistent with the years of project planning. The treatments are effectively lowering fuel levels in order to minimize the severity of the next wildfire on terrain that has already burned at extreme intensity.

YSS underscores our collaborative support for completing the fuel reduction and reforestation treatments as rapidly as possible. We stand united in opposing any delay.

Mule Deer Foundation
Blue Mountain Minerals
Tuolumne River Trust
CT Bioenergy Consulting
Sierra Pacific Industries
American Forest Resource Council
Stanislaus Trail Bike Association
Tuolumne County Farm Bureau
California Forestry Association
Pacific Ultrapower Chinese Camp
Friends of Berkeley Tuolumne Camp
Pine Mountain Lake Association

American Motorcyclist Association, District 36
Tuolumne County Sportsmen
Central Sierra Environmental Resource Center
Central Sierra Audubon Society
James R. Dambacher Construction
Merced Dirt Riders/4x4 in Motion
Tuolumne Band of Me-Wuk Indians
Tuolumne County Board of Supervisors
Sierra Pacific Industries
Tuolumne County Alliance for Resources
and the Environment
Tuolumne County Resource Conservation District
Pacific Gas and Electric Company

Respectfully,


Patrick Koepele, YSS Chair
Tuolumne River Trust


Brian Wayland, YSS Vice-Chair
Sierra Pacific Industries