YSS Leadership Team – Recommended Approach for Large Landscape Planning

The YSS Leadership Team and the general members of YSS support the goal of significantly ramping up the pace and scale of forest treatments in the Stanislaus Forest. To achieve this goal, in 2016 YSS proposed a Pilot Project to increase mechanical thinning treatments by 5,000 acres per year and prescribed fire by 3,000 acres per year above the current average treatment levels attained by the Stanislaus National Forest, which is about 8,900 acres per year of commercial and pre-commercial mechanical thinning treatments and 2,683 acres per year of prescribed fire.

The Forest Service has proposed the MOTOR M2K plan for the Stanislaus and Sierra National Forests (that would allow a total of 1,500,000 acres of treatments over 15 years). Although many specifics of the proposal are not yet defined, the "condition-based" plan would generally describe where treatments on each forest would be planned and what kinds of treatments may be done – all prior to the Forest Service doing any site-specific field surveys or assessment work in the defined project areas. Although "a hard check-in" review of the plan might be scheduled after 5 years, once the 15-year plan decision is finalized, no further formal NEPA comment period, appeals, or judicial review would be available to the interested public for the next 15 years.

The YSS Leadership Team is collectively concerned that the unproven "condition-based" approval process, the elimination of the normal public engagement and objection opportunities, and the very-large scale of pre-approved treatments in the 15-year plan all make the conceptual plan highly controversial. A significant amount of USFS staff time and stakeholders' time would be demanded to hurry this giant plan through the process in the timeline laid out by the two Forest Supervisors. The likelihood for litigation (even potentially by some members of the stakeholder collaborative groups) appears to be high. It is the judgment of the YSS Leadership Team that we do not believe the current proposal can garner broad enough support, even within YSS, to be implemented. Consequently, it would not accelerate the needed increase in pace and scale of forest health treatments. It could, however, impede such increases by breaking apart the consensus approach that we have worked so hard to achieve. **Accordingly, the YSS Leadership Team is looking for ways to reduce controversy, achieve a major increase in pace and scale of treatments, and build trust in Forest Service planning -- rather than mistrust and polarization.**

To this end, the YSS Leadership Team considered a variety of different approaches that we believe will achieve the goal of increased pace and scale while reducing controversy and risk of litigation. The Leadership Team recommends the following approach be taken to achieve a better outcome:

MODIFIED VERSION OF THE ORIGINAL YSS PILOT PROJECT PROPOSAL

After roughly two years of preliminary discussions, in 2017 the YSS membership approved the concept of a 5-year Pilot Project large landscape plan that included 5,000 acres of thinning logging, 3,000 acres of prescribed burning, and 300 acres of ecological restoration each year. These treatment targets were proposed to be "additive" to the regular program of work produced by the Stanislaus Forest.

As an alternative option to the MOTOR M2K approach, the YSS Leadership Team sees the potential for a 5-year "condition-based" plan that would allow the agency to show that condition-based planning can be acceptable and non-threatening, but with a much shorter time period than 15 years and that poses less risk for those who are skeptics. Also, instead of assuming treatment acreage objectives would be "additive," this **Modified 5-year Pilot Project plan would include the following large landscape plan targets for the Stanislaus Forest:**

Average of 20,000 acres of prescribed burning a year.
Average of 10,000 acres of commercial logging a year on average
Average of 7,000 acres of shredding, mastication, and other fuel treatments a year
Average of 3,000 acres of pre-commercial treatments a year
= Average of 40,000 acres of TOTAL forest treatments a year

Total acres treated over 5 years would be:
100,000 acres of prescribed fire
35,000 acres of shredding, mastication, and other fuel treatments
50,000 acres of commercial logging
15,000 acres of pre-commercial treatments
=200,000 acres of total treatments over 5 years.

This acreage represents a significant increase in forest treatments from the status quo and emphasizes commercial logging and prescribed burning. While the prescribed fire acreage would include pile burning, the goal would be to significantly increase broadcast burning and to accomplish at least 50% of the 100,000 acres as broadcast burning.

This plan option would envision an average of 40,000 acres of treatment each year and up to 200,000 total acres of treatments over 5 years with a "condition-based" plan and without the additional NEPA public engagement process after initial NEPA approval. It would allow the public to see with a pilot project test whether condition-based planning does or doesn't work as envisioned. It could build trust in a new planning approach and sets an ambitious goal for forest treatments.

After 5 years, the project would conclude, and the Forest Service would review project results. If there was broad agreement that the project had been successful, the Forest Service could initiate a separate decision document based heavily on the first MOTOR M2K document, that would be for a 10-year project. The 5-year timeline for the original decision would reduce controversy while providing the Forest Service an opportunity to build understanding and trust of the conditions-based approach to project planning and implementation.

2) OTHER APPROACHES CONSIDERED

In addition to this approach, the YSS Leadership Team considered two other approaches to significantly increase the pace and scale of forest treatments. The first approach would imitate the speedy NEPA done for Rim Salvage and Reforestation. It would have completed a large NEPA plan over an 18-24-month period and would have approved specific treatments on specific acres. The second approach would have produced a long-term programmatic plan with tiered project specific NEPA documents. Ultimately, the Leadership Team chose to recommend the 5-Year condition-based NEPA as a way to significantly increase the pace and scale while testing out a new approach that, if successful, can be used for future decisions, while also potentially building trust in this approach with the public.

ELEMENTS NEEDED FOR ANY LARGE LANDSCAPE PLAN

- The pace and scale of forest treatments is consistently and significantly higher than the past average
- Enough wood products are produced to meet industry needs regionally
- If the planning strategy is untested or controversial, minimize the plan's time period
- The plan has adequate clarity as well as flexibility
- A balance of wood products, prescribed burning, and restoration treatments is assured
- NEPA-required resource surveys and analysis will focus primarily on the key issues that matter
- If stakeholder consensus identifies concerns or input, the agency will be responsive

The acres of treatments presented in these three alternatives are significantly larger than the current treatment levels, and may, in fact, prove unrealistic due to capacity and funding constraints. However, we sought to present an ambitious plan that provides a high level of treatments and an opportunity for the Forest Service and local industry to ramp-up its capacity.

Table: Comparison of the Alternative Approaches

	Baseline	MOTOR M2K		YSS Alternative 1	
Duration of Plan		15		5	
Treatment Type	Average Ac/Yr Treated	Average Ac/Yr Treated	Total Acres Treated	Average Ac/Yr Treated	Total Acres Treated
Prescribed Fire	2,683	TBD	TBD	20,000	100,000
Fuels Treatment	6,207	TBD	TBD	7,000	35,000
Timber Harvest	1,602	TBD	TBD	10,000	50,000
Pre-Commercial Thinning	1,087	TBD	TBD	3,000	15,000
Total	11,579	50,000	750,000	40,000	200,000