Sierra Pacific Industries
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March 23, 2017

Kathleen Nelson, District Ranger
Almanor Ranger District, LNF
PO Box 767
Chester, CA 96020

Re: Proposed Action – Rocks Restoration Project (Rocks Project) #49830

Kathleen;

Sierra Pacific Industries operates forest product manufacturing facilities (2 sawmills, 16 dry-kilns, 2 planers, shipping department, and associated support departments) and a biomass powered cogeneration plant, which together employ approximately 320 wage-earners in Quincy, CA. Our manufacturing facilities, as well as our employees and contractors, local merchants, county agencies and the surrounding communities, rely on the direct and indirect income generated by the production and sale of forest products developed from forest management and restoration activities occurring on the Lassen National Forest.

Public lands managed by the USDA Forest Service (portions of the Lassen and Plumas National Forests) occupy approximately 70% of the land-base of Plumas County, however these lands are tax exempt, or non-assessable. This means they do not contribute directly to the tax base as privately owned properties do. As a result, Plumas County is dependent on receipts generated through the sale of timber and other products from federal lands to provide this revenue. Providing socioeconomic benefits, including the provision of a sustainable supply of timber, is part of the mandate of the USDA Forest Service.

From data provided by the Census Bureau, Plumas County Board of Education, Plumas County Department of Public Works, and others, one can deduce that Plumas County's population and infrastructure decline, and reduced sales tax revenue, are correlated to the reduction, over the past three decades, in timber and other products made available from National Forest lands.

One can make the argument that watershed, wildlife, and recreation values, among others, must be taken into consideration when managing public forestlands. We agree wholeheartedly with this argument. Our position is that proper forest management and restoration activities can help conserve these values as well as promote and perpetuate local communities.

Available data show that annual timber growth on the Lassen National Forest is considerably higher than what is being harvested. And what is being harvested is still significantly less than what is dying. This suggests that there is a lot more that can be accomplished across the landscape to improve forest health, enhance watersheds, benefit wildlife, reduce the threat of catastrophic wildfire, and generate income for local communities. All this work can be implemented without effecting wildlife and habitat, and can be done so sustainably.

As stated in the Notice of Proposed Action of the Rocks Project, the Purpose of the project is "to retain and restore ecological resilience of National Forest System lands within the project area and contribute to the strategic placement of fuel breaks." Objectives of the project include:

- Strategically create and maintain areas for safe and effective fire operations
- Promote healthy, diverse, heterogeneous vegetation including aspen and meadow enhancement
- Promote the integrity of water resources and special aquatic habitats
- Provide an economic benefit to the local community
- Maintain legal access to trailhead, water resources, and dispersed campsites

As stated, the Lassen intends to fulfill these objectives by implementing Proposed Actions which include: fire and fuels treatments, reforestation treatments, forest health treatments, treating riparian conservation areas and meadow and aspen ecosystems, and improving the transportation system.

Please consider the following comments concerning the Proposed Actions for the Rocks Restoration Project:

Sierra Pacific Industries supports the use of the Healthy Forest Restoration Act (HFRA) of 2003 to facilitate the environmental analysis authority provided in section 104 of Title 1. HFRA provides authorities the ability to expedite planning and effectively implement hazardous fuel reduction projects. We believe collaborative requirements within HFRA will engage concerned individuals in the initial stages of the Project and help its timely implementation. We encourage the Forest Service to use HFRA to make this a successful and economically feasible, commodity producing project.

The project area seems to be within the footprint of what were the Raven and Peacock Danger Tree sales; which later became the Peacock Stewardship. The Raven and Peacock Danger Tree sales were not advertised until over a year after the Chips Fire burned. They were advertised late in the season as weather was starting to change. The timber had already somewhat deteriorated as it had been over a year since it had burned. Purchasers were apprehensive in

bidding on the project because of the merchantability of the timber and the prospect of having to go another season before being able to log it. I think it eventually sold as Peacock Stewardship the following summer.

If stewardship work is to be part of this project, it is understood that that portion of the project will not produce timber receipts for Plumas County. Timber receipts from Forest Service sales have been reduced by approximately 70% over the last three decades, reducing significantly dollars received by local communities; our County Schools and Roads department are suffering financially due to this. For that reason "Timber Sales" and not "Stewardship Contracts" should be the end product of these proposed projects.

You acknowledge in the scoping paper that "the Forest Service has a role to play in providing a wood supply for local manufacturers and contributing to sustaining the employment base in rural communities, while providing a sustained quantity of forest product." But it seems each year the amount of volume being produced on the Lassen and other Forests goes down. If the Forest had a proactive instead of reactive approach to land management, which included actively managing forestland to prevent or minimize the destruction caused by wildfire rather than the opposite, wildlife, watersheds, and local communities would all benefit.

There are approximately 6,035 total acres in the project area. Of that total approximately 1,438 acres are slated for various types of treatment including; snag falling, shrub pulling, fuel piling, prescribed fire, tree planting, and conifer removal. Of the 1,438 acres being treated it appears that only 285 acres will be mechanically treated for conifer removal. This ratio of potentially revenue producing work (mechanically treated acres) and work that will be completed at a cost (snag falling, shrub pulling, fuel piling, other) is lopsided and doesn't appear to be economically feasible.

Table 3 shows that approximately 2,138 acres within the project area has a forest canopy CWHR of 4M, 4D, and 5M. This indicates that there is the possibility of creating projects within the project area which are cost effective and can meet the objectives listed in the proposed action. These acres should be treated now to improve forest health and interrupt potential fire spread, reduce the risk of fire to local communities and wildlife habitat, and promote watershed values.

Fire and Fuels Treatments

We believe providing effective fuel breaks. Reducing canopy closure by modifying the horizontal as well as vertical continuity of forested stands is crucial in creating a healthy fire and drought resilient landscape. Thinning stands over a broad distribution of diameter classes – from 10 to 29.9", creating gaps across the landscape, and radial thinning around large overstory trees, will help produce more vigorous and fire-resilient stands, reducing the likelihood of stand replacing fires and drought induced mortality.

We believe the slope limitation of 35% for mechanized cutting equipment is not substantiated, and that more ground could be treated economically if this limitation were removed. It may

contribute to more ground disturbance initially but will result in more acres treated and a more cost-effective project.

Snag felling will be hazardous to both operators of mechanized equipment and those individuals hand-felling trees. Tops will easily come out of snags being felled possibly injuring those on the ground and in equipment. It's stated that the average diameter of snags in the project area is 15-inches dbh. It's also stated that four percent of wildland firefighter fatalities are caused by falling trees and snags; this is during fire operations when a majority of the trees are still somewhat solid. The snags to be treated as part of the Rocks project are more than 5-years old and are significantly more dangerous to cut than what are encountered in most firefighting conditions.

Reforestation Treatments

We applaud your efforts in attempting to reforest the brushfields that have been created as a result of the two previous fires.

The inability to use herbicides in follow-up treatments required in plantations will stifle any attempt at artificial regeneration unless follow-up treatments, as indicated, are implemented at approximately 2- and 5-years after planting.

Perhaps if you went with an EIS versus a EA you could incorporate herbicide use into your reforestation efforts and follow-up treatments.

The statement that planting seedlings with growing stock "from lower elevations in response to climate change" (p.6) is unsubstantiated and cannot be backed-up scientifically.

Forest Health Treatments

Annually, over half the annual budget of the Forest Service is spent on fire suppression. With more investment in forest health treatments this number could be reduced significantly by creating healthy fire resistant forested watersheds which do not burn as intensively as unmanaged lands.

Reducing canopy closure by modifying the horizontal as well as vertical continuity of forested stands is crucial in creating a healthy fire and drought resilient landscape. Thinning stands over a broad distribution of diameter classes – from 10 to 29.9", creating gaps across the landscape, and radial thinning around large overstory trees, will help produce more vigorous and fire-resilient stands, reducing the likelihood of stand replacing fires and drought induced mortality.

The process of "thinning from below," or the use of "hand thinning" does not adequately treat a forested stand in which fire and drought resiliency and watershed improvement are to be the outcome. Mechanical thinning is more productive and cost effective than hand thinning. The use of mechanized equipment would allow larger diameter trees to be cut which would produce more sawlogs across the proposed project area and help offset the associated costs of treatment.

Improving forest health economically can be better accomplished by mechanically and conventionally thinning existing stands of timber across a broad distribution of diameter classes (dominants, co-dominants, and suppressed trees) and spacing residual trees in such a manner that will reduce overall competition for soil moisture and nutrients. Cutting trees of all diameters classes will help improve the watershed, improve forest health, improve wildlife habitat, and increase funds distributed to Plumas County by increasing timber receipts. Trees of all diameter classes should initially be cut with the realization that over time stands will grow into the desired conditions.

If the outcome across the landscape is to be uneven-age multi-storied stands composed primarily of shade intolerant species, radial thins could be used to promote vigor in the larger diameter trees. This could include thinning clumps of larger diameter, shade intolerant trees. This will help reduce density related mortality from inter-tree competition, insects, and disease.

We believe the slope limitation of 35% for mechanized cutting equipment is not substantiated, and that more ground could be treated economically if this limitation were removed. It may contribute to more ground disturbance initially but will result in more acres treated and a more cost-effective project.

Creating a healthy fire and drought resistant forest is beneficial to all wildlife. Over the past decade as a result of the Storrie, Moonlight, Chips, King, Rim, and other fires across the Sierra landscape, an estimated 100+ Spotted owl PAC's have been destroyed by wildfire. Implementing proper forest management and restoration activities is essential to the health of our forests, productivity of our watersheds, and the survival of our wildlife and its habitat.

RCA's/Aspen and Meadow Ecosystems

Enhancing watershed conditions, including water quality and habitat for riparian and aquatic species, can be accomplished through proper forest management and restoration activities. Thinning stands to help promote health and vigor by reducing fuel loads and increasing vertical and horizontal continuity across the landscape is beneficial to our watersheds. It reduces the likelihood of catastrophic fire and promotes forest health by reducing competition in the stand.

We disagree with the statement suggesting that trees >30"dbh, felled for safety and operability, be left within the units as large woody debris for wildlife and other considerations. Leaving merchantable logs behind is a waste of the resource, and takes dollars away from the community we are trying to support. It is apparent based on the number of snags inventoried that there is no lack of woody material in the project area.

We believe that the idea of diameter limits for conifers in the aspen units is counterproductive to the work that is needed in the aspen stands to promote regeneration and increased growth. All conifers should be cut and removed from inside the aspen stands to eliminate the conifer seed source as well as the competition within the stand.

Also, to reduce the likelihood of immediate successional encroachment as well as provide light, nutrients, and moisture for the aspen, those conifers that are within 1.5 tree-lenghts (100-150 feet) of the perimeter of the aspen stands should also be cut.

Removing conifers from an aspen stand will result in improved forage production and increases the chance of the stands survival.

Transportation System

We agree that maintaining a stable and effective cost-efficient transportation system should be a priority. A well-maintained road system is beneficial for both resource protection and resource management. Future forest management and restoration projects, and continued fire suppression efforts will depend on a well-maintained road system. Continued forest management and restoration activities help contribute to a well maintained and functioning road system.

Thank you for the opportunity to comment on the proposed Rocks Project.

Respectfully submitted,

Jared J. Tappero, Division Forester