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February 12, 2014

Patricia Grantham, Forest Supervisor
Klamath National Forest
1711 South Main Street
Yreka, CA 96097

Dear Patty:

Thank you for the opportunity to comment on the Crawford Vegetation Management Project (Crawford Project). AFRC represents over 60 forest product businesses and forest landowners in twelve western states. Our mission is to create a favorable operating environment for the forest products industry, ensure a reliable timber supply from public and private lands, and promote sustainable management of forests by improving federal laws, regulations, policies and decisions that determine or influence the management of all lands. Many of our members have their operations in communities within or adjacent to the Klamath National Forest and the management on these lands ultimately dictates not only the viability of their businesses, but also the economic health of the communities themselves.

The proposed project has identified the following purpose and need for action. It includes:

1. Forest Health
2. Forest Biological Diversity
3. Provide Forest Products

The Forest issued a new scoping notice since as you are proposing to change the analysis from an Environmental Assessment to an Environmental Impact Statement. We originally submitted comments for this project on September 7, 2011. Those comments are still valid and are included as an additional attachment. These comments reflect some changes in our original comments that concern project effectiveness and logging systems.

SCOPING COMMENTS

PROJECT EFFECTIVENESS

- The analysis needs to display how long the treatments will be effective in meeting the designed purpose and need. All the proposed commercial units are in the Matrix land allocation. In order to meet the desired condition for ecological restoration and fuels management the treatments will need to be intensive enough to be effective for a considerable period of time. A letter from the Regional Office discusses the need to not

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plan for reentries into areas for a least a 20 year time period (Attachment 1). In order to treat more acres over the next several decades we recommend prescriptions be developed that allow for a 30 year effectiveness. **(CHANGE FROM ORIGINAL COMMENTS)** Spacing for 30 year effectiveness will vary by the size of trees desired to be left within the units. The smaller the leave trees the closer the spacing. The opposite is true for larger leave trees. The spacing will need to be wider in order to eliminate competition problems before the intended timeframe. The following table exhibits an example of spacing required based on the average size of leave trees following harvesting in order to achieve long-term effectiveness from the proposed treatments.

AVERAGE DBH OF LEAVE TREES	20"	25"	30"	35"
AVERAGE SPACING NEEDED	26-28 feet	33-39 feet	39-47 feet	36-54 feet

PROJECT ECONOMICS (CHANGE FROM ORIGINAL COMMENTS)

- The proposal currently identifies 445 acres of ground based and 93 acres of cable. Given the small amount of proposed cable harvesting, economic consideration will be very important for successful implementation of the project. It is essential to assess the feasibility in relation to volumes per acre, size of trees being removed, distance to landing, species of tree being removed, current delivered log prices, etc. Logging costs, fuel costs, haul costs, and lumber prices have been in a state of flux over the last several years. We ask that you take these recent increases and decreases into consideration in your economic analysis. ③
- Logging Systems: The following is a rule of thumb to follow when assessing logging system viability:
 - Conventional harvesting – desire, as a minimum, to average 6-7 mbf/acre (more is needed if biomass removal is expected). ④
 - Cable harvesting – desire, as a minimum, to average 10 mbf/acre. Also with skyline harvesting in order to pay for move in and move out costs the project should have a minimum of 1.5-2 mmbf. Species, yarding distance, haul distance, and size all play into the amount of volume needed to economically skyline harvest. ⑤
- If helicopter harvesting becomes a reality during the assessment phase there are some key considerations you must consider.
 - Helicopter harvesting – desire, as a minimum to average over 15 mbf/acre. The project should have at least 1.5-2 mmbf of helicopter volume that is mixed with lower cost harvest systems. The important thing to remember that each turn should maximize the weight capacity for the helicopter in order to maximize efficiency and economics. As with the cable harvesting, species, yarding distance, haul distance, and size all play into the amount of volume needed to economically helicopter harvest. Flight distances should be kept to approximately ¼ mile. ⑥

- It is not desirable to be re-entering the helicopter stands on a regular basis. Treatments need to be effective for at least 30-40 years. Leave spacing will also need to be greater ⁽⁷⁾ than that proposed for the conventional units.
- Helicopter harvesting is a feasible option to assess when there are access issues. It has its place and should be used in those instances where other harvest systems are not feasible. ⁽⁸⁾ The important point is to do an adequate economic assessment when utilizing helicopter harvesting and then employing the correct contracting method in order to accomplish the work.
- Lastly, the season of operation is an important consideration. With so many limited operating periods included in projects the actual available days for harvesting is very limited. Usually the months of August and September are the only months that are free ⁽⁹⁾ of limited operating periods. Unfortunately these months also coincide with the peak of fire suppression activities across the West. During fire suppression activities the availability of helicopters can be very limited. This makes it difficult for purchasers to plan their operations, especially during these times of volatile timber markets.

RIPARIAN RESERVE TREATMENTS (ADDITIONAL)

- In our original comments we submitted, as attachments, two publications justifying the need to enter into riparian reserves. We are hopeful that you still have copies of those publications. Let me know if you don't have them.

AFRC wants to go on record in support of the Crawford Project. Thank you for the opportunity to comment on the proposed project and please keep us informed on the progress of NEPA. We are also interested in any field trips that may be set up for this project.

Sincerely,

/s/**Richard J. Svilich**

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