



ASSOCIATED CALIFORNIA LOGGERS

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February 3, 2020

Eli Ilano, Forest Supervisor Tahoe National Forest 631 Coyote Street Nevada City, CA 95959

Re: Proposed Forest Plan Amendment for Managing Natural Fire for Multiple Resource Benefits

Dear Mr. Ilano,

The Associated California Loggers (ACL) submits the following comments on the proposed Forest Plan Amendment for Managing Natural Fire for Multiple Resource Benefits. ACL represents companies and individuals who harvest and transport materials for the forest products industry. Our members play a major role in the stewardship of California's public and private forests. We are committed to excellence in managing California forests for sustainability and economic benefit for the communities dependent on forest productivity.

ACL understands the historical context in which you describe the role of fire in our Sierra forest landscapes. In the introduction of the proposed amendment, you discuss a brief chronology of fire ecology on the TNF. You point out the basis for the need to introduce an amendment to the TNF forest plan that would allow naturally caused lightning fires to be monitored and managed as a 'watch' 'let burn policy'. ACL believes this policy would be unrealistic. It would be a major shift from mimicking fire through mechanical fuel reduction treatments which is a far better approach to reducing fuel for firefighter safety on a wholesale level. Consider the following:

1. Confine or limit this policy to landscapes above 7,500'. This is not discussed on p. 9. The guidelines simply discuss a broad stroke approach where, when and under what climate, stand conditions and other historical fire footprints a natural lightning fire would be 'watched'. The mere parameters the guidelines discuss is highly subjective and prone to inherent human fallibilities.
2. Evidence the recent escaped managed prescribed fire on the ENF (Caples Fire). While not lightning caused, USFS fire staff decided to ignite what was to only be a 75 acres prescriptive burn. The fire escaped and an added 3,000 acres were burned. Smoke from this fire affected air quality in El Dorado and Amador counties for 10 days until precipitation arrived.
3. Consider the back log of acres the USFS committed to burn in other projects where NEPA design criteria called for prescriptive fire. These areas are in a state of flux continuing to accumulate fuel.
4. Consider the revolving door of USFS personal and inconsistencies of their skill levels to implement this let burn policy.
5. Consider limited USFS budgets and tying up resources to 'watch' lightning fires over a prolonged time.
6. Any natural lightning caused fires on the peoples National Forest, allowed to 'watch' burn is a risky proposition considering fuel accumulations over a landscape that is

fragmented with large **wildlife areas** set aside over the past 40 years where USFS policy has done nothing to reduce dense tree stand conditions and forest floor fuel accumulations, not only on the TNF but up and down our Sierra Nevada National Forests. This is a recipe for disaster. Fuel loads in these areas on average are running up to 50 tons per acre or more.

7. Consider the limited burn days associated with air quality and human respiratory risk to not only small local community populations but to Sacramento and San Joaquin valley, the San Francisco bay area populations plus smoke drift into Reno, Nevada.

Solutions/Recommendations:

- Do not pigeonhole the TNF into a policy that would preclude other activities such as mechanical treatments to achieve the desired conditions. This will only serve to cause controversy from opposing viewpoints to demand the TNF to vehemently uphold this policy and not look to other common-sense alternative treatments like mechanical treatments.
- Stay with current policy. Do not seek an amendment at all.
- If the TNF feels this policy is called for, keep the parameters restricted to the lowest risk areas, such high elevations where lightning caused fires can simply skunk around in large granite rocky and boulder fields with little vegetation. This would reduce monitoring cost. And furthermore, it would be low risk to life and developed properties such as homes in rural and urban communities.

In conclusion, ACL is 'Categorically' opposed to the proposed TNF forest plan amendment, unless you can narrow down the parameters to very low risk areas as mention hereinabove. Furthermore, ACL takes a broad position that fuel reduction and forest health projects should be geared toward resiliency and community protection against catastrophic fire through mechanical treatments before introducing prescriptive fire or watching/monitoring lightning fires on a wholesale basis. On behalf of ACL, thank you for the opportunity to submit comments.

X 

John Quidachay

Associated California Loggers Timber Specialist

February 3, 2020