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Jennifer Eberlien, Regional Forester

Cc: Liz Berger  
Priya Shahani  
Talitha Derksen  
Laura Hierholzer

## **Region 5 Post Disturbance Hazardous Tree Management Project**

Dear Jennifer, Liz, Priya, Talitha, and Laura:

Our environmental center provides the following scoping comments in response to the Region 5 Post Disturbance Hazardous Tree Management Project based on the limited information, maps, and supporting materials now available. Our Center is also signing on to a separate letter along with other organizations that addresses our shared concerns related to hazard tree management issues associated with trails, roadless areas, and Wilderness.

However, this scoping comment letter from CSERC more narrowly addresses scoping points tied to specific hazard tree salvage logging treatments along roads and around facilities and infrastructure. Hopefully, the comments below can help the Region to speed up project approval and thus be in position to implement hazard tree treatments as quickly as possible.

### **TREATING LEGITIMATE HAZARD TREES**

As now described on page 3, the approach for roadside hazard tree treatment will be to **remove moderate to high hazard trees “up to one-and-a-half times the tree height striking distance of the road.”**

The area assessed for cutting hazard trees will be **“within 300 feet of the roads.”**

These are two very different numbers, but when it comes to actual implementation of salvage logging, our Center’s experience monitoring hazard tree logging has found that the numbers may get blurred.

Both of the treatment distances described on page 3 appear to make sense, but our Center's monitoring of actual on-the-ground hazard tree removal following the 2013 Rim Fire along countless miles of roads in the Stanislaus Forest helps us recognize some important challenges associated with the two proposed distances described above.

First, when fallers worked on steep slopes above roads in the Rim Fire - cutting hazard trees in a sea of blackened snags - it was often extremely difficult or impossible for a chainsaw operator to judge accurately whether a snag's tree height was "up to one-and-a-half times the tree height striking distance of a road." He might not even be able to see the road due to thickets of small dead trees or due to the terrain or other reasons.

Accordingly, because the Forest Service used hazard tree risk distances (we believe they were 200' above roads and 150' below roads in the Rim Fire hazard tree removal projects), salvage logging crews (or Forest Service project administrators) in many cases flagged along the edge that they judged to be the correct maximum distance from the road. And as individual tree fallers worked (isolated for safety reasons) amidst the thickets of large snags, it frequently ended up that they tended to cut all standing dead trees between the flagging and the road. They didn't restrict cutting based on strike distance or tree height. They cut dead trees within the assessment road-buffer width.

Across many long stretches, hazard tree fallers ended up cutting trees in linear clearcuts within the maximum assessment distance for hazard tree removal. **(See two photo examples below and many others attached at the end of these comments)**





When this practice of “strip cutting” of nearly all snags within the 200’ above roads and 150’ below roads was pointed out to Forest Service staff, they shrugged it off. At least one forester gave the perspective that it was essential for the safety of the fallers not to have the FS quibble over the cutting of “associated dead trees that can be judged to be needed to be removed for safety as the fallers cut the targeted snags that COULD certainly reach the road.”

To summarize most simply, it may seem logical to put down on paper a restrictive cut limit for the cutting of dead trees for hazard reasons (to be set at one-and-a-half-times the tree height striking distance). **Our Center actually agrees that a strike distance of one-and-a-half times the tree height is very appropriate.** But the USFS should be aware that in many instances the result that will actually occur may be the fairly uniform cutting of all dead trees within the broader assessment areas along roads, irrespective of their tree height striking distance.

For CSERC, we believe the tree-falling work is dangerous enough, and the need to provide safe public access along roads is important enough, that we won’t find the excessive cutting of snags to be alarming. It will simply reduce the post-fire fuel accumulations and make the road corridors more effective in the future for fuels management purposes.

But the Region should carefully evaluate how to address this when other conservation organizations or individuals may be much more likely to blast the Forest Service for purportedly adding sawlog volume or for other supposed reasons intentionally cutting many dead trees that were not located where they could reasonably strike a road and pose a safety risk.

**Comment: CSERC supports the one-and-a-half-tree-height-strike-distance from a road, but because the assessment distance often may end up being the actual hazard tree cutting strip, we recommend the assessment distance be reduced to 200’ each side of roads in order to realistically protect public safety and yet not expand the potential tree cutting area so broadly that many “hazard” trees end up being cut, even though they pose no hazard risk.**

## THREE OVERLY RESTRICTIVE REQUIREMENTS IN THE PROPOSED ACTION

The following are three excessive restrictions described in the Proposed Action that provide no ecological benefit and won't be followed anyway:

- 1) Pg 4 – “lopped and scattered slash would be less than 8 feet in length” ...

**Comment:** CSERC points out that large down woody material up to a certain amount per acre helps to provide habitat benefit for wildlife, helps keep soil moist during the hot summer season, helps to hold soil from being washed downslope as runoff during major post-fire storm events, etc. In terms of down wood value, the larger, longer pieces of down wood have more value than smaller, short pieces. There is no fuels management or project efficiency rationale to require that lopped and scattered slash be less than 8 feet in diameter. In contrast, restricting the depth of post-treatment slash to 18” on average is a standard, logical approach that does make sense. Keeping slash pieces under 8 feet in length does not make sense. **CSERC recommends that the Region delete the requirement for pieces of slash to be less than 8 feet in length.**

- 2) Pg 4 – “Piles would be... no more than 4 feet high and 6 feet in diameter...”

**Comment:** There is zero ecological benefit to restricting piles to no more than 4 feet high and 6 feet in diameter. CSERC's decades of experience either actively doing fuels management, monitoring fuels management, or reviewing plans for fuels management all shows that allowing slash piles to be the size most appropriate for a particular site makes sense. At landings or in open sites, extremely large slash piles are highly appropriate, and can actually be safer to burn and result in better consumption. In almost no situation is there any logical benefit for mandating a specific small pile size limit. Such a requirement is totally overly restrictive and simply will never be followed by crews working on the ground. **CSERC recommends that the Region delete the requirement for piles to be no more than 4 feet high and 6 feet in diameter.**

- 3) Pg. 4 – “Chipping and spreading... would not exceed a depth of 6 inches...”

**Comment:** There is no reason for such a restriction. Chip depth may vary greatly within a 10<sup>th</sup> of an acre based on low spots or difficulty for spreading them due to stumps and down woody material. Having a chip depth of 10” or 12” or a mosaic of different chip depths will not result in ecological harm nor does a 6” depth requirement create any ecological or economic benefit. The requirement won't actually be followed on the ground. **CSERC recommends that the Region delete the requirement for wood chip depth to be no more than 6”.**



Executive Director



**ADDITIONAL EXAMPLES OF HOW TREE HEIGHT GETS IGNORED AND STRIP CUTS RESULT DUE TO MANY REASONS IN REAL-WORLD HAZARD TREE TREATMENTS**





This site was only partially treated, only below the road at the time of the photo.

