



**ASSOCIATED CALIFORNIA LOGGERS**

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**Comments on Region 5 Post Fire Disturbance Hazardous Tree Management  
Date: November 13, 2021**

**To: Jennifer Eberlien  
Regional Forester  
Region 5 California**

**From: John Quidachay, Associated California Loggers  
Timber Specialist Consultant**

On behalf of the Associated California Loggers, I am giving comments for the R5 Post Disturbance Hazardous Tree Management Proposal. ACL supports this much needed approach. ACL recognizes that policy limitations tend to have an onerous way of delaying the decision to react quickly to remove hazard trees along the many miles of road where public, administrative as well as third party land in-holdings need for safe passage to conduct recovery and restoration of their forest from the mega fires of 2020 and 2021. It is crucial to capture tree mortality the first 3-6 months of post fire suppression and containment activities. After 6 months and beyond 1-year, commercial value of trees diminishes exponentially in the face of unnecessary delays caused by frivolous lawsuits. In reviewing the larger linked scoping document, be mindful of the extraneous nature of the many specialist reports that can bog down the emergency activities that need to happen quickly on the ground. ACL therefore recommends the following:

1. Hold to a strict schedule for specialist reports. Cancel long annual leave vacation time with key personnel charged with meeting deadlines.
2. Do not allow a revolving door of detailers. This will only further delay the emergency action needed to abate and remove hazard trees.
3. Do not allow editorial comments from specialist that do not support important endeavor.
4. All Archaeological surveys should be performed in “real time”. Waiting for surveys before decision to implement will delay implementation.
5. Remove merchantable timber; and keep trees likely to survive. All diameter classes should be included and subject to removal.
6. Do not require piling of small slash material. Scattering small material will prevent erosion and decomposition will occur within 5 years. Piling

small material only increases logging cost and USFS burning is a stagnant activity and usually never gets carried out on time.

7. Do not get hung up on any snag retention requirements in any of the road zones regardless of burn severity.
8. Get rid of the borate requirement or any reference to it. This is not supported by any good science. Borate does nothing to prevent the spread of annosus root rot. Besides, the annosus pathogen is a naturally occurring pathogen. This is like saying to prevent a bark beetle outbreak, the agency will require aerial insecticide to eradicate bark beetles on salvage operation.
9. Wildlife: The notion that the USFS is still hanging on to noise levels is preposterous. Again, get rid of this or any reference to it. There are no real conclusive noise and decibels levels of what turns a bird's head. The objective is to mitigate public safety not noise. Define a decibel level that is too loud for birds. What about common birds not of concern? What is good for one bird must be good for all birds. Right? Would you limit loud motorcycles because of noise? Or fire woodcutting noise. You see the absurdity in this? Define noise ambient levels.
10. Waive all limited operating periods for roadside hazard tree abatement and removal. To increase the pace, refrain from unnecessary contractual limitations placed on loggers and mill purchasers. For the next two decades, the job of restoring burned forests in region 5 will take an all-hands-on deck approach. Loggers are the solution. Insert a sentence in the purpose and need to meeting the purpose need. Insert a sentence in the It is important to limit unnecessary requirements that will delay safe travel zones for the public and other stakeholders.
11. The purpose and need section in the scoping letter is well targeted towards public safety and other mitigating factors for the greater good but does not mention supplying economic sustainability to the logging and milling industry and to local communities. Please say this in your purpose need. Do not acquiesce to special interest groups. Just because there is an economic value in a wood product, does not mean it is bad thing.
12. Utilization: Removing fire killed commercial trees is a key component to capturing the greatest amount of sound wood fiber. Fire killed or seriously fire injured timber should not be held to the same utilization standard as green timber. ACL recommends starting with 16 inches dbh and up to one third or fifty percent sound. Most small diameter trees under 16 inches dbh will be severely checked once felled and decked and are subject to ambrosia beetles. Ambrosia beetles are active now in the standing dead

trees spreading ambrosia fungus, which further breaks down wood fiber, making it undesirable for mill board manufacturing.

13. Consider shifting to a programmatic EA that the agency can use for at least 10 years.

**Utilization recommendations:**

1. Minimum dbh, 16 inches
2. For dead salvage between 16 inches and 20 inches, 50% sound
3. For dead salvage greater than 20 inches, 30% sound

If sales are advertised with these variables, the risk of a no bid is lowered. In general, imposing broad limitations will increase appraisal cost.

In conclusion, after reviewing the extraneous requirements being considered within the hazard tree road zones by specialist is too limiting if the aim is to meet the purpose and need quickly and efficiently. Please consider ACL's comments. It is important to get this right.

Respectfully,



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