



# Sierra Pacific Industries

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November 12<sup>th</sup>, 2021

Jennifer Eberlien  
C/O Christine Handler  
Pacific Southwest Regional Office  
1323 Club Drive  
Vallejo, CA 94592

RE: Region 5 Post-Disturbance Hazardous Tree Management Project

Thank you for the opportunity to comment during the Scoping phase for the Region 5 Post-Disturbance Hazardous Tree Management Project. The following comments are written on behalf of Sierra Pacific Industries.

Sierra Pacific Industries (SPI) is a third-generation family-owned forest products company. The company owns and manages over two million acres of timberland in California, Oregon, and Washington. SPI is committed to managing its lands in a responsible and sustainable manner to protect the environment while providing quality wood products & renewable power to consumers.

SPI is a partner in the Pacific Southwest Fuels Management Partnership (<https://www.nfwf.org/programs/pacific-southwest-fuels-management-partnership>). The program is a partnership between the National Fish and Wildlife Foundation, the USDA Forest Service Pacific Southwest Region, the US Fish and Wildlife Service, the US Bureau of Land Management, Sierra Pacific Industries, and Pacific Gas & Electric. This year \$1.8 million in Conservation Grants to improve forest health and wildfire resilience over 9 projects was awarded this year.

SPI California has sawmills facilities in Quincy, Lincoln, Oroville, Anderson, Shasta Lake, Burney, Sonora, and Chinese Camp. As well as cogeneration power plants at some of these facilities. These facilities are an important part of the local economy and provide family wage jobs for their employees.

SPI shares hundreds of miles of cost share roads with the USFS, that are either part of the project proposal or are tributary to the Proposed Action areas. SPI is a long-standing partner with the USFS, having successfully completed hundreds of projects over the last 40 years, and continue to lead the way in the Region with numerous USFS Stewardship Contracts, Cooperative Road Agreements, Fire & Fuels MOU, and active participation in various USFS Collaboratives. Communication and collaboration on subsequent projects that utilize these shared roads will be critical to the project's successful implementation.

## **Please consider the following comments in support of the R5 Post-Disturbance Management Project:**

We are encouraged that the Forest Service has optioned a broad scale for the planning and implementation of the R5 Post-Disturbance Management Project. The size and scope of the project on a landscape level is appropriate. It will allow the pace and scale of the restoration work to be completed,

and provide partners, enterprises, and contractors a safer work environment as future work is being implemented.

**Purpose and Need for the Project:**

*Reduce public safety hazards along portions of roads, trails, and facilities.  
Reduce fuel loading associated with felled hazard trees.*

We would like to see the Forest Service add language referring to the need of maintaining public and private access of these road systems for future reforestation and restoration projects to the purpose and need for the project. The restoration treatments designed for the R5 Post-Disturbance Management public lands will contribute to safer working and recreation conditions into the future. This is critical to the mission of the USFS.

SPI believes the Federal OSHA Regulations regarding Danger Trees- Federal OSHA 29 CFR 1910 Subpart R: 1910.266 <https://www.osha.gov/laws-regs/regulations/standardnumber/1910/1910.266> need to be included in the proposed action to assure worker safety.

**Project Areas:**

Please consider amending Table 1 to include roads, trails, and facilities affected by the Sheep Fire (North Complex), and Hog Fires on the Lassen National Forest (Central Sierra Zone).

Please add additional maps for the Forests in the described Zones that depict the roads, trails, and facilities that were affected by the described fires. There are discrepancies in how each Forest displays project areas being considered for the Proposed Actions.

**Proposed Action:**

We support the Proposed Action in the R5 Post-Disturbance Management Project and the associated treatments:

- Identification, felling, and removal of hazardous trees
- Maintain roads, trails, and facilities
- Use of design features to minimize negative effects

Please amend the Proposed Action regarding treatment of stumps with a registered borate compound, to reference the “USFS Region 5-Borate Stump Treatment Priority by Forest Condition and Harvest Activity” table. The table provides current recommendations on when the treatment of stumps is appropriate. This is not consistent with the R5 Report #RO-12-01 recommending the use of borate compound ***“To perpetuate the forest environment in and around developed recreation sites, treat all freshly cut coniferous stumps to prevent the introduction and spread of Fomes annosus.”*** The Proposed Action needs to be consistent with the updated Region 5 Direction on use of a Borate Compound for Heterobasidion root disease (April 2021)

Please amend the Proposed Action regarding prohibition of temporary roads. Temporary roads will be necessary in certain situations to access new landings and complete the Proposed Actions.

Please amend Appendix B, pg. B-4 to remove language regarding the requirement of stump heights of 6-8”. The 8-12” stump height requirement is more appropriate in meeting the purpose and need and keeping costs low.

Please amend Appendix B, pg. B-4 to remove language regarding the requirement of tillage. This requirement is not appropriate in road side hazard tree removal. In all situations, all of the ground within the linear units will be less than the 15% of the total burn area.

Please amend Appendix B, pg. B-6 to remove language regarding the requirement of LOP's (Limited Operating Periods) within areas of high intensity burns. These areas should be considered unusable as wildlife habitat.

Please amend Appendix B, pg. B-9 to add language regarding the requirement of using weed free straw, to include the use of slash as an alternative.

Please amend Appendix B, pg. B-10 to remove language regarding the requirement to flush cut stumps. This is an expensive and time-consuming requirement that negates the need to increase the pace and scale of completing projects.

Please amend Appendix B, pg. B-11 to remove language regarding the requirement of tillage, and the requirement to limit soil disturbance to 15% of the harvest units. In many cases the units will be linear clearcuts, thereby impossible to adhere to the requirement.

Please amend Appendix B, pg. B-12 to remove language regarding the requirement to retain large down logs. This requirement is counter to the Purpose and Need – (e.g. “there is a need to reduce fuel loading associated with felled hazard trees adjacent to portions of roads and trails, and near facilities. . .” stated in the Proposed Action.

Please amend Appendix B, pg. B-15 to remove language regarding the requirement to retain large down logs. This requirement is counter to the Purpose and Need stated in the Proposed Action.

Please amend Appendix B, pg. B-18 to remove language regarding the requirement of tillage, and the requirement to limit soil disturbance to 15% of the harvest units. In many cases the units will be linear clearcuts, thereby impossible to adhere to the requirement.

Please amend Appendix B, pg. B-19 to remove language regarding the requirement to retain large down logs. This requirement is counter to the Purpose and Need– (e.g., “there is a need to reduce fuel loading associated with felled hazard trees adjacent to portions of roads and trails, and near facilities. . .” stated in the Proposed Action.

We appreciate the opportunity to comment on the Proposed Actions. As partners, we are supportive of the Regions commitment to maintain the road system for future restoration and recreation opportunities, while providing a high level of safety for all users. If you have any questions regarding our comments, please do not hesitate to contact me.

Sincerely,



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