



ASSOCIATED CALIFORNIA LOGGERS

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Region 5 Post-Disturbance Hazardous Tree Management Project #60950

The California Associated Loggers is pleased to submit comments in the above-named proposed action. ACL is a non-profit trade association with membership numbering nearly 450 from the logging community to business throughout California who support our industry. ACL supports the proposed action. This approach has been proposed by the logging community for many years and the Association will work with USFS Region 5 in any we can to support this endeavor. Please review and consider the comments below.

Purpose and Need

This section is very well written and lays out the urgent need to take action that will abate the roadside hazard trees in all three forest zones. The back log and lack of actions is evident as you look at these public lands as a whole. Access to National Forest Lands is a critical element for a many different activities. Safe and reliable access to the peoples lands to remediate the tremendous-physical, biological and economic impacts to rural communities who rely on these lands for their livelihoods and enjoyment will serve the people in the short term and in the future. The logging community is the workforce needed to affect the recovery and restoration of these lands and is prepared to take on the challenges. Weighing heavily on safety and protecting life and property as the primary goal will go a long way in defending the proposed action.

Biological Evaluations (BE)

Be cognizant in presenting a plethora of wildlife limitations, especially in areas that will delay field operations. A 57 page BE seems a bit much. A design criterion that would retain any hazard tree regardless of size for wildlife is not appropriate, especially where high public and administrative use would occur now and in the future. ACL recommends only retain large wildlife snags in remote roaded areas where it is not likely to pose a high risk to public safety or is closed to public use. As is mentioned in the BE, there will not be a deficit of snags across the burned landscape, in fact given the capacity in both the agency and private mill and logging sector, much of the burned landscape will not be managed. Expediting the removal of hazardous trees along roads and other critical infrastructure should be not beset by unnecessary and extraneous limitations such as limited operating periods. The goals and objectives are to act with deliberate actions to provide for the safety of all users including private sector companies doing business on National Forest Lands.

Appendix 7 Water Quality

Per this sentence: *The close proximity to, and contact with, the waterbody increases the potential for introducing sediment and other pollutants that can affect water quality.*

Strike the second part of this sentence “and other pollutants that can affect water quality”. This is ambiguous and will be a red flag for opposition parties to delay a decision. The period should come after sediment. The term pollutant is used loosely throughout this section. Consider striking this reference.

Project Design Features

An extensive litany of BMPs is presented. The large list of limitations compiled are far too restrictive and do not meet the purpose and need. See following excerpt from p.4 (Our goal of prioritizing the abatement of potential hazards will be balanced with other agency objectives (see purpose and need element 5); however, we decided to heavily weight the scales in favor of safety, given the potential for injury or death to forest visitors) **Many** of the design features are in direct conflict of the urgency and emergency nature of this project. ACL believes some of the design features do not entirely foreclose negotiations on the ground when operational conditions warrant alternatives. However, the operators on the ground need the maximum ability to use common sense alternatives that will be critical to success and produce adequate end results. Do not allow other agency objectives to cloud the purpose and need.

ACL recommends changing design features that require specialist consultation with the project Sale Administrator or FSR. In the field personnel should be given the maximum flexibility to make professional decisions based on advice and consultation with specialist. A common-sense approach should be the rule not a specialist recommending foreclosure in every situation. If a specialist were involved in every small detail, nothing would get done on the ground. This will only serve to delay operations. ACL recommends, specialist must respond with input within 24 hours of a request for input. If a specialist cannot respond within this timeframe, the Sale Administrator -FSR makes the decision to move forward.

AA-11: Strike chainsaws from refueling within streamside zones. This is an unnecessary superfluous requirement. Refueling chainsaws will not cause ill effects to streamside zones, unless a feller refuels in flowing water. This make no sense at all.

H-7: Eliminate all borate application, not just within 25’ of streamside zones. The application borate is an archaic and unnecessary requirement. The science on soaping stumps with borate for preventing root rot is inconclusive and its application does prevent the spread. In fact, the annosus spore is natural occurring phenomenon and is spread in many different ways and cannot be effectively contained. Private land in holders within National Forest boundaries within the north zone analysis area do not apply borate on cut stumps, therefore its is a waste of time and money. Furthermore, there is a serious unsafe element to applying borate in feller buncher operations.

WN-3 -WN-8 Noise: Feller bunchers and other equipment such as road graders do not produce high enough decibels levels to limit operations. A 600’ radius limitation will suffice based on noise studies and anecdotal evidence. These types of limitations do not meet the purpose need. Extraneous limitations only serve to curtail and limit the pace to move quickly abate tree hazards and comply with the purpose need.