



ASSOCIATED CALIFORNIA LOGGERS

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Region 5 Post-Disturbance Hazardous Tree Management Project #60950 Northern, Central, and Southern Forest Zones

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 way we can to support this endeavor. Please review and consider the comments below.

Purpose and Need

This section is written well, describing in no uncertain terms the urgency and the need to take action that will abate the roadside hazard trees in all three forest zones. The backlog and lack of actions are evident as you look at these public lands as a whole. Access to National Forest (NF) lands is a critical element for a many different activities. Safe and reliable access to NF 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 well 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 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 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 not be 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 NF 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 language.

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 the 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 with 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. In the field personnel should be given the maximum flexibility to make professional decisions based on advice and consultation with a specialist. A common-sense approach should be the rule not the exception. Specialist should not have the authority to foreclose on sensible actions that meet the purpose and need. If a specialist were involved in every small detail, nothing would get done on the ground. This will only serve to delay operations. For example, to approve and an ephemeral crossing, a qualified sale administrator or harvest inspector will have the skills to agree with an operator the best location for the crossing site and remediation measures. It comes down to trusting sale administration staff and an operator on ground making the day-to-day decisions without specialist approval.

ACL recommends the following:

1. 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 will make the decision to move forward. The FS must streamline this process to keep hazard tree abatement operations moving forward without delay.
2. The agency may not have the specialist staff to respond. Use Partner organizations to augment FS unavailable specialist. FS must relinquish some control to outside specialist who are equally qualified.

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 faller refuels in flowing water. This makes no sense at all.

H-7: Eliminate all borate application, not just within 25' of streamside zones. The application of borate is an archaic and unnecessary requirement. The science on soaping stumps with borate to prevent root rot is inconclusive and its application does not prevent the spread. In fact, the annosus spore is a natural occurring phenomenon and is spread in many different ways and cannot be effectively contained. Private land within NF boundaries in all the proposed analysis zones 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 to abate tree hazards and comply with the purpose need.