SIERRA PACIFIC INDUSTRIES

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May 9th, 2022

Jennifer Eberlien
Regional Forester
Pacific Southwest Regional Office
1323 Club Drive
Vallejo, CA 94592

Re: Region 5 Southern Sierra Zone Post-disturbance Hazardous Tree Management Draft Environmental Assessment and Finding of No Significant Impact

Dear Ms. Eberlien,

Sierra Pacific Industries (SPI) is a third-generation, family-owned Forest Products Company, based in Anderson, California with 14 sawmill locations and over two million acres of actively managed timberlands throughout California, Oregon, and Washington. The Sonora Division is the southernmost part of the Company's operations, and includes the Standard and Chinese Camp facilities, directly employing 300 local workers and numerous contractors. In addition to investments to our community, SPI has made significant investments into our facilities over recent years, including rebuilding the Chinese Camp sawmill in 2007 and the Sonora sawmill in 2011.

Background

SPI Sonora Division would like to thank you for the opportunity to comment on the R5 Southern Sierra Zone Post-disturbance Hazardous Tree Management Draft Environmental Assessment (DEA) and Finding of No Significant Impact (FONSI). In general, SPI supports the proposed actions in the R5 Southern Sierra Zone DEA, including the identification, felling and removal of hazardous trees, maintenance of roads, trails, and facilities, and the use of design features to minimize negative effects, with consideration of the comments below.

Project Purpose & Need

As referenced in the DEA, the primary purpose of this project is to "provide for the safe use of National Forest System roads, trails, and facilities" by any and all who utilize them, which will be accomplished by maintaining forest infrastructure and mitigating hazard trees generated from wildfire, as well as pests, pathogens, drought, or other stressors (either pre- or post-wildfire.) Associated needs include:

- maintaining integrity of said roads, trails, and facilities
- reducing fuel loading in and around those areas
- maintaining economic and operational efficiency
- provide for recreational and ecological values associated with hazard trees without undermining core project purposes

The Southern Sierra Zone forests that are included in the DEA are the Inyo, Sequoia, and Sierra forests. It is unclear why the Stanislaus National Forest was not included in this project/DEA, as we are currently seeing an increase in both beetle activity and mortality on both SPI and National

Forest properties. Additionally, it is without a doubt that the Stanislaus will experience fire disturbance on some scale during the next several years. To have an EA in place that includes post-disturbance hazard mitigation for the Stanislaus would be, at the least, proactive, and would ensure the safety of all roads, trails, and facilities users in the Southern Sierra Zone.

Hazard Mitigation Along Trails

As is made clear in the project purpose, there is significant emphasis on the need for roads, trails, and facilities to be made safe for utilization by all users. One of the proposed actions within the project purpose is that, adjacent to trails, "only those trees that pose an immediate threat (100 percent dead per [project] guidelines would be felled and left on the ground or bucked and hand-piled for burning. No trees would be removed along trails" (8). This proposed action does not align with the foremost intention of this project, which is *maintaining the safe use of NFS roads, trails, and facilities*. Using criteria that only identifies completely dead trees, without considering the likelihood of further mortality of fire-damaged trees as a result of current drought conditions, and only allowing for said trees to be felled and not removed, is actively contributing to the potential for trees to fall on/along trails, which increase wildfire fuel-loading and potential for injury to trail users. As is refenced multiple times in this DEA, wildfire ignition is particularly likely along roads and trails that are highly trafficked by the public. Felling and leaving any more downed woody material than absolutely necessary is actively contributing to the possibility of wildfire ignition along trails. If a wildfire ignites post-operations and is fueled by said downed materials, trail users may become trapped as their only evacuation route would likely be consumed by wildfire.

SPI recommends that the criteria by which hazard trees along trails are identified be adjusted to address the statistic that "killed or damaged trees…are expected to fall within the next 3 to 5 years" (11), and that the removal of identified hazard trees along trail systems be allowed in concurrence with applicable design features (RA-9, RA-10, RA-12) to ensure the project purposes and needs be met in full.

Borate Compound Application

As described in the DEA, design features allow for treatment of cut stumps with registered borate compound to reduce likelihood of infection in remaining live trees by *Heterobasidian* species. This stipulation "would vary by area and would be assessed at implementation" (9).

The majority of planned operations in project areas are stands that burned with moderate and high intensity. In addition to fire-killed trees, many fire-damaged trees outside of the operating areas are likely to succumb to post-fire stresses. Because of this likelihood, it would prudent to focus borate application on operating areas adjacent to stands with high probabilities of survival. SPI recommends that borate treatment only be implemented when absolutely necessary considering the information above, as it can become an extra cost, both financially and in productivity, that may take away from the efficiency of this project.

Proposed Actions, Alternatives & Issues - Wildlife Habitat

SPI recognizes the need to maintain habitat for threatened, endangered, and sensitive species within the project area. However, the proposed action (supported by Design FeatureWA-1 and WA-4) calls for large-diameter fire-killed trees or pre-fire snags that are identified as safety hazards to be "felled, but in many cases would be kept whole as down logs and not bucked or piled, retaining much of their value as wildlife habitat for the developing stand" (26). However, directly following this statement, the DEA states that,

> "While fire-killed trees along forest roads would be felled as part of proposed activities, an abundance of fire-killed trees in all size classes, including large diameter, would persist outside of the roadside treatment areas across large portions of the fire-affected forests, into the forseeable future" (27).

This implies that there is an abundance of fire-killed trees throughout the project area, and greater forest, that provides ample habitat for wildlife. Therefore, the need to retain a 30 inch diameter limit (WA-1) and requirement that large-diameter hazards trees remain as downed woody material (WA-1, WA-4) becomes less crucial, as ample habitat does exist throughout the project area outside of the 300 foot treatment areas along roads, trails, and facilities. Additionally, allowing for the removal of large diameter hazard trees would prevent them from contributing to fuel-loading, or impacting access for future fire suppression, management activities, or recreation.

SPI recommends an interdisciplinary team be assigned to determine the need and propriety for a 30 inch diameter limit and the consequential leaving of large trees as downed woody material in areas where it would be feasible and prudent to remove large trees instead.

<u>Appendix B – Design Feature SA-2 and SA-5</u>

This design feature, intended to preserve soil integrity and reduce erosion, does not take into consideration winch-assisted equipment that can operate on slopes of 55% or more. The California Forest Practice Rules allow for operations on slopes up to 65% (50% if the erosion hazard rating is high or extreme.)

In order to ensure that the design features in this project are optimized to ensure efficiency and efficacy to meet the listed purpose and needs, SPI recommends that these design features account for all feasible operational alternatives, including equipment that can operate on slopes greater than 35% without jeopardizing the soil integrity.

<u>Appendix B – Design Feature HA-1</u>

This design feature stipulates that "all ground-disturbing activities" **within and outside** of the normal operating season (May 1st to October 31st) be implemented according to each forest's Wet Weather Operation Standards.

It is unclear why operators would be required to work under Wet Weather Operation Standards during the normal operating season. If implemented, working under these standards should be decided on a case-by-case basis under the direction of a qualified watershed specialist.

Appendix B – Design Feature HA-6

This design feature does not specify what equipment is allowed to be refueled, and could feasibly be applied to chainsaws, which would be unrealistic and unnecessary to not allow to refuel within AMZs (or only at landings.)

SPI recommends specificity as to what equipment may only refuel at designated landings within AMZs, as well as clear designation that chainsaws be allowed to refuel within AMZs.

Appendix B – HA-10, BA-4, and CA-8

Each of the above design features address felling and removal of hazardous fuel within boundaries (EEZs, flagged sensitive species populations, and historic properties, respectively,) and the exclusion of heavy equipment to remove felled trees from within the boundaries of these areas (CA-8 specifies that removal can occur if heavy equipment remains within an existing road prism.)

SPI recommends that these design features be amended to allow equipment that is capable of lifting downed trees out of these areas without crossing delineated boundaries to ensure for the most efficiency possible.

Appendix B – RA-1 and RA-13

These design features further limit operating periods; RA-1 stipulates “avoidance” or operating within the boundaries of developed recreational sites during recreation season (May 15-September 15) and RA-13 limits closures of trail segments to Monday through Friday, additionally excluding any holiday weekends. This further exacerbates scheduling difficulties already experienced by operators trying to navigate PAL restrictions and LOPs. Additionally, this increases the likelihood of recreation within areas that are unsafe due to looming hazard trees that have not been mitigated, which is a direct contradiction of this project’s purpose and needs.

SPI recommends that these design features be reevaluated for feasibility and functionality when considered with the purpose and needs of this project.

Conclusion

Sierra Pacific Industries appreciates this opportunity to comment of the Southern Sierra Zone DEA. We would lastly like to emphasize the importance of considering merchantability standards, as references were made throughout the DEA of potential merchantable timber products being recovered during this project. Typically, timber retains its merchantability up to two years post-disturbance, which means that trees disturbed during the SQR Complex and Creek fires are nearing non-merchantability.

For this reason, we encourage the Southern Sierra Zone and Region 5 as a whole to pursue the Emergency Situation Determination to ensure that National Forests have as much time as possible to recover remaining value from these disturbances.

Hannah Grabowski
Sierra Pacific Industries – Sonora Division
Procurement Forester