



SIERRA PACIFIC INDUSTRIES

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May 9, 2022

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

RE: Region 5 Post-Disturbance Hazardous Tree Management Project: Central Zone

Thank you for the opportunity to comment on the Emergency Authorities for the Region 5 Post-Disturbance Hazardous Tree Management Project. The following comments are written on behalf of Sierra Pacific Industries specific to the Central Zone project area.

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. In 2021 \$1.8 million in Conservation Grants to improve forest health and wildfire resilience over 9 projects was awarded.

SPI - California has 6 sawmill facilities tributary to the **Central Zone** Forests; they are located in Quincy, Oroville, Lincoln, Anderson, Shasta Lake and Burney; in addition to the mills there are 3 cogeneration power plants. Together these 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.

Emergency Authorities - Support

Access to public and private lands is critical for restoration while providing safe travel for the public to high use areas. **We are in support** of the Forest requesting an Emergency Situation Determination (ESD) or using other emergency authorities to expedite implementation of projects in the Central Zone. There is an urgent need for implementation of some actions starting this spring and summer of 2022. Prioritization should focus on:

1. High use roads accessing private lands and emergency access routes;
2. Cost share roads and;
3. Roads to public use areas such as camp grounds, trailheads and ecological areas.

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.

During the initial Scoping Period Sierra Pacific Industries submitted comments to be addressed and for consideration in the Draft Environmental Assessment (EA). Several of these have been modified or removed for the Central Zone in the associated Draft EA, thank you. The following are for consideration;

- 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.

We appreciate the opportunity to participate by commenting on the ESD request and on the Scoping 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,



Jake Blaufuss

Procurement Forester

Sierra Pacific Industries – Quincy

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