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First name: Jerry
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Organization: AFRC
Title:
Comments: Elk Project

Please find attached my comments for the Elk LSR Project

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Jerry van Hees
AFRC Consultant

Dear Dave:
I am writing on behalf of the American Forest Resource Council (AFRC) with comments on the Elk LSR Project. AFRC is a regional trade association whose purpose is to advocate for sustained yield timber harvests on public timberlands throughout the West to enhance forest health and resistance to fire, insects, and disease. We do this by promoting active management to attain productive public forests, protect adjoining private forests, and assure community stability. We work to improve federal and state laws, regulations, policies and decisions regarding access to and management of public forest lands and protection of all forest lands. AFRC represents over 50 forest product businesses and forest landowners throughout the West. Many of our members have their operations in communities adjacent to the Shasta Trinity National Forest, and the management on these lands ultimately dictates not only the viability of their businesses, but also the economic health of the communities themselves. The state of California forest sector employs approximately 20,000 Californians, with AFRC's membership directly and indirectly constituting a large percentage of those jobs. Rural communities, such as the ones affected by this project, are particularly sensitive to the forest product sector in that more than 50% of all manufacturing jobs are in wood manufacturing.

The primary purpose and need for the Elk LSR Project has been identified to: "Reduce the current and future risk of large¬scale disturbance events within early, mid and late¬-successional habitats."

Secondary purpose and needs for the project include: increasing the resilience and connectivity of the LSR and nearby stands, reduce the potential for high severity fire on adjacent private lands and within Wildland Urban Interface, restore and maintain meadow habitat in Elk Flat, increase hardwood diversity across the project area, and improve stream flow and vegetation conditions within Riparian Reserves associated with Ash and Swamp Creeks and their tributaries.

The proposed action will thin natural stands ranging from 60¬120 years of age on 1,526 acres and 10¬40 year old plantations on 664 acres. These treatment areas will also include radial thinning around legacy pine to protect this stand component and regeneration and group selection in existing mortality and root disease pockets. Removal of encroaching conifer to restore meadow conditions is proposed on 518 acres. Aspen and California black oak will be released to increase hardwood species diversity across the project area.

Well we realize that the production of timber is not a purpose of the project since it is in an LSR, we feel this project needs to treat as many acres as possible in order to fully meet your non-timber designated purpose and need including increasing the resiliency of the current LSR to survive wildfire. We encourage you not to reduce the project any further. A project that treats only limited acres undermines the objective of providing a landscape-¬scale benefit that enhances the resiliency of the LSR to withstand wildfire and avoid loss of late successional wildlife species. Secondarily, any further reduction in the project runs counter to the need to maintain industry

infrastructure to accomplish the non-timber objectives the Forest Service wants to achieve through improving the growth of residual trees to maintain and restore the health the resiliency of the forest. The current industry infrastructure is very important to helping you implement your projects and achieve wildlife habitat improvement and watershed restoration. This needs to be a consideration when assessing economics and project design. As project after project shrinks in size and volume during the NEPA analysis it cumulatively, has a major impact on the ability to maintain adequate infrastructure to accomplish your land management activities, including in this case enhancing the resiliency of the LSR to benefit late successional species.

AFRC wants to go on the record in support for your decision in selecting Alternative 1 - Modified Proposed Action and Preferred Alternative for the Elk LSR Project for the Final Decision Notice and Finding of No Significant Impact. This was the only feasible alternative that met the purpose and need for the project.

The Elk LSR Project will be challenged by those who don't have an understanding of the need to restore healthy forest ecosystems, which includes aspen stands. We ask that you stand behind the excellent work done by your employees. Since there is a high probability this project will be litigated we would still like to be kept in the loop on this project. We would like to be notified and receive any copies of litigation that may be filed for this project.

Sincerely,
/s/Gerard MJ van Hees
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