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First name: Scott  
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Organization: American Forest Resource Council  
Title: AFRC Consultant  
Comments: Rocks Restoration Project \_AFRC Comments

Dear Kathleen,

The American Forest Resource Council (AFRC) provides the attached scoping comments based on our review of the Rocks Restoration Project proposed action, purpose and need. Supporting documents are also attached. Thank you for the opportunity to comment. Please keep me informed as the project progresses.

Sincerely,

/s/Scott Stawiarski

Scott Stawiarski

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American Forest Resource Council

March 17, 2017

In Reply To: Rocks Restoration Project

Dear Kathleen:

The American Forest Resource Council (AFRC) provides the following scoping comments on the proposed Rocks Restoration 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 Almanor Ranger District, and the

management on these lands ultimately dictates not only the viability of their businesses, but also the economic health of the communities themselves. In the California forest sector, 8.5 direct and indirect jobs are created per million board feet (mmbf) of timber harvested. These numbers include stump-to-mill and sawmill jobs. Rural communities, such as the ones affected by this project, are particularly sensitive to the forest products sector in that most manufacturing jobs are in wood manufacturing. The forest products sector is one of the few sources of stable living-wage employment in these communities.

AFRC is glad to see the Almanor Ranger District is proposing vegetation management that will likely provide useful timber products to our membership. Our members depend on a predictable and economical supply of timber products off Forest Service land to run their businesses and to provide useful wood products to the American public, and we appreciate the Lassen National Forest for contributing to this supply.

## 1. Maximize Acres Thinned for Forest Health Restoration

Forest health is a major concern on the Lassen National Forest and forests throughout the west. Regional Forester priorities were stated in the August 10, 2016 letter "FY17 Priorities, Program Direction, Operating Budget, and Performance Contributions." Regional response to tree mortality from insect and disease is the first priority listed.

AFRC supports thinning over stocked stands to improve forest health. It makes sense to treat as many acres as possible when planning projects in the area. The Rocks Restoration proposed action identifies 2,138 acres of closed canopy forests (CWHR, 4M, 4D, and 5M), 1,638 acres of open canopy forests (CWHR (4S, 4P, and 5P), and 288 acres of CWHR 2 and 3. There is a total of 4,064 acres of forest cover in the project area. Only 285 acres are proposed for mechanical thinning. That is only 7% of the total forest cover in the project area. Why?

AFRC would like to see forest health thinning increased wherever possible. Please provide a table that includes all stands in the project area. For each stand, please provide the current and projected conditions including percent of maximum stand density index (see below). Also, please include the reason why stands are/are not proposed for treatment.

## 2. Design Effective and Economically Efficient Thinning Projects

An important Regional objective is to reduce the probability of large-scale tree mortality by reducing high stand densities. Much of the forested area within the Rocks Restoration project area have stand densities that exceed biological potential and are especially susceptible to tree mortality during drought conditions. Stand Density Index (SDI) as described in the scoping document is an excellent measure of stand stocking density and vigor and can be used to determine effective tree stocking densities over time to meet forest health objectives.

The proposed action states "Target stand densities following thinning would range from 35 to 50 percent of maximum stand density index so that stand density would remain at or below 60 of maximum for 20 years after thinning to minimize the need for re- entry." AFRC recommends and supports this silvicultural prescription based on one thinning entry every 20 years. This would reduce the number of entries over time and provide added assurance against future drought. Heavier thinning would meet forest health objectives for a longer timeframe, create conditions more conducive to the establishment and growth of shade intolerant species, and provide sufficient value (saw timber) for economically efficient projects that can pay their way out of the woods.

This approach has been widely used and was endorsed by former Regional Forester Jack Blackwell. See attached Regional Forester letter "Conifer Forest Density Management for Multiple Objectives, 7/14/2004."

When considering areas with restrictions on canopy reduction, long term benefits to forest health should be weighed against any short-term reductions in canopy closure.

### 3. Canopy Cover vs. Canopy Closure

The treatments being proposed will likely affect northern spotted owl habitat to some degree. Often this level of effect is quantified by the amount of forest canopy that remains following thinning treatments. AFRC has general concerns with how the Forest Service and USFWS have been measuring these effects to spotted owl habitat, specifically regarding canopy cover/closure. Please see the attached document titled "NSO Canopy Condition" as an addendum to these comments for consideration in how the treatments on this project are designed and how this design affects the spotted owl. Based on this extensive literature review, AFRC has concluded that canopy condition related to the effects on spotted owls should be measured using canopy closure rather than canopy cover.

### 4. Biomass Removal and Tree Mortality Map (Tier 1 and Tier 2 Areas)

The scoping document states, "Trees 3.0 to 10.0 inches dbh may be removed mechanically or cut and piled for burning". Commercial removal of this material is contingent on the area being identified as high hazard zones (HHZ) as defined by the CA Tree Mortality Task Force Website. The HHZ map drives biomass purchases for the next 5 years. Biomass from areas not on the map will be low priority or unavailable for purchase.

In 2017, regulation requires that 50% of biomass purchased must originate from a defined HHZ, 2018 requires 60%, and 2019 forward requires 80% from HHZ areas. The Forest needs to make sure the HHZ Map is updated at least every 6 months to include proposed projects. The current version was developed last year and should be updated. The District should focus future projects, as much as possible, in areas that are in the mapped HHZ Areas.

If the biomass planned for removal is not in an HHZ, and therefore unlikely to be purchased, the removal of the biomass should not be required under timber sale contracts; it should be subject to agreement.

### 5. Spotted Owl Surveys vs. Limited Operating Period (LOP)

It is important to accelerate the pace of treatment as forest health continues to decline. Various LOPs have pushed some projects into multiple years, extending the length of time to complete because of the limited number of days available to operate.

LOPs need to be reduced when possible and should be as short and geographically limited as needed for resource protection. The Forest needs to consider using regular wildlife surveys over larger areas to possibly clear individual projects from needing to apply LOPs. This would speed up the process of getting acres treated.

The Forest should also explore take avoidance strategies to allow certain types of treatments during LOPs. The Fish & Wildlife Service has developed strategies for fisher in Washington and California that have proven effective. AFRC would be glad to work with you to determine workable take avoidance strategies.

### 6. Operating Restrictions

The timber products provided by the Forest Service are crucial to the health of our membership. Without the raw material sold by the Forest Service these mills would be unable to produce the amount of wood products that the citizens of this country demand. Without this material, our members would also be unable to run their mills at capacities that keep their employees working, which is crucial to the health of the communities that they operate in. These benefits can only be realized if the Forest Service sells their timber products through sales that are economically viable. This viability is tied to both the volume and type of timber products sold and the way these products are permitted to be delivered from the forest to the mills. There are many ways to design a timber sale

that allows a purchaser the ability to deliver logs to their mill in an efficient manner while also adhering to the necessary practices that are designed to protect the environmental resources present on Forest Service forestland.

The primary issues affecting the ability of our members to feasibly deliver logs to their mills are firm operating restrictions. As stated above, we understand that the Forest Service must take necessary precautions to protect resources; however, we believe that in many cases there are conditions that exist on the ground that are not in step with many of the restrictions described in Forest Service NEPA documents and contracts (i.e. dry conditions during wet season, wet conditions during dry season). We would like the Forest Service to shift their methods for protecting resources from that of firm prescriptive restrictions to one that focuses on descriptive end-results; in other words, describe what you would like the end result to be rather than prescribing how to get there. There are a variety of operators that work in the area with a variety of skills and equipment. Developing a contract that firmly describes how any given unit shall be logged may inherently limit the abilities of certain operators to work on the project.

For example, restricting certain types of ground-based equipment rather than describing what condition the soils should be at the end of the contract period unnecessarily limits the ability of certain operators to complete a sale in an appropriate manner with the proper and cautious use of their equipment. To address this issue, we would like to see flexibility in the contract to allow a variety of equipment to the sale areas. We feel that there are several ways to properly harvest any piece of ground, and certain restrictive language can limit some potential operators. For example, in conjunction with cable harvesting on steeper slopes, there are opportunities to use certain ground equipment such as feller bunchers and processors in the units to make cable yarding more efficient. Allowing the use of processors and feller bunchers throughout these units can greatly increase its economic viability, and in some cases, decrease disturbance by decreasing the amount of cable corridors, reduce damage to the residual stand and provide a more even distribution of woody debris following harvest.

#### 7. Mechanical Thinning, Meadow, and Aspen Enhancement in Riparian Areas

The proposed action identifies 63 acres of mechanical treatments in riparian areas (meadow and aspen enhancement). The Lassen National Forest has successfully completed similar projects in the past. However, mechanical treatments in riparian zones are the most restrictive. There are 25 integrated design features (IDFs) under aquatics and watershed. Some of these address specific equipment requirements. We would like the Forest Service to shift their methods for protecting resources from that of firm prescriptive restrictions to one that focuses on descriptive end-results as discussed above.

Thank you for the opportunity to comment. Please keep me informed as the project progresses.

Sincerely,

/s/Scott Stawiarski

cc, AFRC, CFA

enclosures

\* Conifer Forest Density Management for Multiple Objectives; letter from Jack A. Blackwell, Regional Forester, to Forest Supervisors and Directors, dated 20040714

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NSO Habitat "Treat and Maintain" Canopy Cover Requirements vs. Canopy Condition References in Supporting

Literature