

Data Submitted (UTC 11): 8/18/2017 7:00:00 AM
First name: Gerard
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Organization: American Forest Resource Council
Title: Northern California Representative
Comments: Dear Dave:

Thank you for the opportunity to comment on the proposed HWY 89 project DEIS.

AFRC represents over 60 forest product businesses and forest landowners in twelve western states. Our mission is to create a favorable operating environment for the forest products industry, ensure a reliable timber supply from public and private lands, and promote sustainable management of forests by improving federal laws, regulations, policies and decisions that determine or influence the management of all lands. Many of our members have their operations in communities within and adjacent to the Shasta Trinity National Forest and management on these lands ultimately dictates not only the viability of their businesses, but also the economic health of the communities themselves.

The HWY 89 Project has identified the following purpose and need for the proposed project.

- [bull] Improve public safety along California State Highway 89.

- [bull] Improve public safety and reduce hazardous fuels in Wildland Urban Interface (WUI) defense zones and in developed recreation areas.

- [bull] Treat forest stands to improve their health and resilience.

- [bull] Treat other vegetation types to reduce fuels and improve conditions, including prescribed burning.

- [bull] Manage the Forest road system for better Forest management and recreation access.

- [bull] Construct a new helispot and decommission the old helispot.

The proposal includes the following actions:

The Highway 89 corridor (578 acres),

Plantations of trees 10 inches dbh or greater (2,890 acres),

Plantations of trees less than 10 inches dbh (1,043 acres)

Mixed conifer natural stands (1,273 acres)

Pine-dominated natural stands (3,821 acres)

Other vegetation types subject to treatment include: knobcone pine dominated stands (653 acres,

thinning and under burning), a bitterbrush field (61 acres, encroaching conifers will be cut, brush may be crushed, and the area will be underburned), and a black oak stand (13 acres, oaks will be thinned, over story conifer trees will be retained). The McCloud River corridor (212 acres) will not be subject to harvesting, but will have conifers encroaching on riparian vegetation cut, hazard trees cut and removed, and under burning. The Big Canyon Creek area (divided into 3 sections, total 218 acres) will have thinning, hand cutting and piling of brush, and under burning, depending on the section. As special areas overlying some of the vegetation types proposed for the treatments stated above, developed recreation areas (162 acres) and WUI defense zones (694).

Alternatives Considered in Detail

Alternative 1 - No Action

Alternative 2 - Original Proposed Action

Alternative 3 - Modified Proposed Action (Preferred Alternative)

Alternative 4 - No New Temporary Roads, Machine Piling, or Dozer Lines

Alternative 5 - No Group Selection Treatments, Treatments in Threatened

and Endangered Species Suitable Habitat, or Yarding in Riparian Reserves.

The following are additional AFRC comments that we believe should be taken seriously to accomplish the large task ahead of you.

1. NEPA timeliness is essential.
2. Early involvement of the timber industry in the planning stages for advice on where the best opportunities exist for maximizing economic value.
3. Please consider extending the operating periods for these salvage efforts. Minimize the use of Limited Operating Periods (LOP's). Restrictive LOP's can severely impact purchaser's ability to harvest the dying trees in a timely manner. This will give purchasers greater flexibility to efficiently and effectively remove material. Having

operating seasons that go into late fall and winter will allow more trees to be harvested while they still have a maximum economic value.

4. For any of the harvest efforts we ask that Designation by Description and Designation by Prescription be used wherever feasible. These are both time and money saving tools.

5. Ensure that silvicultural prescriptions are followed during marking and cruising of the project by providing timely inspections of the marking.

CONCLUSION

AFRC is encouraged by the completion of the Draft EIS since this is a large and important project.

We are more than happy to assist in making this restoration effort a successful venture. Feel free to call on any of the industry members with questions concerning logging feasibility, merchantability, markets, etc.

We want to go on record in support of Alternative 3 - Modified Proposed Action.

Our original comments, submitted July 11, 2014, are still valid and we ask they remain under consideration as part of this NEPA process

We would like to thank you for considering our comments during this important period on the HWY 89 project. Our members are ready to work with you and your staff to quickly and effectively treat the project area. Please keep us advised of any public meetings, field trips and objections for this project.

Sincerely,

/s/Gerard MJ van Hees