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Comments: Dear David:

The following are AFRC comments concerning the Revised Draft Environmental Assessment (EA) for the Porcupine Vegetation and Road Management Project.

The project identified three key purpose and needs for the project area. They included:

1.Improve Forest Health and Growth

2.Reduce Fuels

3.Maintain Aspen, Meadows, Natural Openings, and Uplands within Riparian Reserves

Four action alternatives have been analyzed in detail as part of the Revised Draft EA. These alternatives were developed either to meet the intended purpose and need or to address significant issues raised during project scoping. The four action alternatives are as follows:

The Proposed Action - Alternative 3a (Proposed Alternative) – includes: 3,252 acres of standard commercial thinning, 125 acres of mature stand thinning, 74 acres of hazard reduction thinning, 310 acres of biomass thinning, 21 acres of aspen release, 34 acres of meadow and natural opening restoration, 64 acres of lodgepole green tree retention (GTR), 19 acres of ponderosa pine GTR, 299 acres of mechanical fuel treatments, 500 acres of slashing fuel treatments, 1,736 acres of underburn.

The Preferred Alternative – Alternative 3b (Preferred Alternative) - Alternative 3b is the same as alternative 3a on 1,550 of the project acres. The remaining acres would include the addition of an adaptive management strategy for completion of the biomass thinning prescription depending on biomass product market conditions at the time of implementation. Biomass may be treated as part of the planned timber sale if agreed to by the purchaser and the U.S. Forest Service just as described under Alternative 3a. If an agreement is not made the biomass sized material would be treated using an adaptive management strategy.

Adaptive Management Strategy for Biomass Thinning Component of Silvicultural Treatments:

The biomass material removal in 17 of the more southerly units totaling 2,415 acres would be an optional item in the timber sale contracts as "Timber Subject to Agreement." Any biomass prescriptions not completed through the timber sales would be implemented through other mechanisms. Up to 1,105 acres of the biomass component in 13 thinning stands would be removed through mechanical mastication. Up to 1,310 acres of the biomass component in 4 stands would be reduced through the previously prescribed underburning treatments-only, rather than commercial removal prior to underburning.

Utilizing underburning to thin biomass would result in a different arrangement of remaining trees than mechanical removal, but the target density remaining averaged across the stand would be similar (see Chapter 3 for a more detailed discussion). Selected biomass-sized trees would be felled prior to underburning if needed to protect valuable components of the residual stand during burning. However, Prescribed burning would be expected to also remove nontarget size classes through scorching in some places.

Alternative 2a - includes: 3,156 acres of standard commercial thinning, 144 acres of mature stand thinning, 74 acres of hazard reduction thinning, 333 acres of biomass thinning, 21 acres of aspen release, 26 acres of meadow and natural opening restoration, 64 acres of lodgepole green tree retention (GTR).

Alternative 7 (No Machine Piling) - includes: 3,156 acres of standard commercial thinning, 125 acres of mature stand thinning, 74 acres of hazard reduction thinning, 310 acres of biomass thinning, 21 acres of aspen release, 48 acres of meadow and natural opening restoration, 64 acres of lodgepole green tree retention (GTR), 19 acres of ponderosa pine GTR.

No Action Alternative – no activities would be implemented with the selection of this alternative.

We are hopeful when you package this project for offer that it is done with economic viability in mind. There have been too many offerings on the Shasta Trinity lately that have been offered and no bids received. Award was not accomplished until revisions were made to the original offer. This is an ineffective way to solicit bids from potential contractors. One of the key issues is the amount of mandatory biomass material included with the sawlog offerings. While we support the removal of biomass you must be careful that the amount included as mandatory removal does not offset the positive value of the sawtimber (see 1st Porcupine offering). It appears the Revised Draft EA has taken care of this issue with the development of Alternative 3b.

AFRC wants to go on record in support of Alternative 3b for the Porcupine Project. It is the only feasible and viable project that meets the purpose and need while providing the best opportunity to be implemented.

Sincerely,

/s/Richard J. Svilich
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