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Comments: Please find AMA District 36 comments in the attached letter.

Please accept these scoping comments submitted by AMA District 36 (D36), a non-profit recreation group, in regards to the Region 5 Post Disturbance Hazardous Tree Management Project. As you know, a number of D36 officials have or continue to serve on community-based forest health collaboratives and support agency efforts to address the current wildfire crisis by increasing both pre and post-fire fuel and hazard tree removal projects including this proposal. D36 would also support an Emergency Situation Determination if warranted by on-the-ground site or District-specific conditions.

D36 has reviewed the Proposed Action and Project Design Features and BMPs and would like to offer the following recommendations or project concepts with the desire that some or all of them are incorporated into the Project.

PROPOSED ACTION

System trails used by OHVs are a highly valued resource and represent a significant investment often using a combination of appropriated funds, state OHV grants, and volunteer labor. System trails should be recognized as such in the PA with a commitment by the agency to avoid their use during vegetation removal or mitigate/restore the route if impacted during felling or skidding operations.

DESIGN FEATURES

Avoid trails where possible during tree felling, skidding, and hauling operations,

OHV Manager(s) and Timber Sale Administrators will coordinate and identify any areas where trails need to be crossed or used. These areas will be returned to pre-harvest trail conditions. OHV trails and roads will remain open except when active logging operations are occurring. Alternate routes will be available. 2

Closure signs will be posted along trails or roads that are temporarily closed during active logging operations. Updates to which trails and roads are closed will be provided at Forest Service offices.

To the maximum extent possible, all trails and roads will be open on the weekends, holidays, and for special OHV events during logging operations

After rehabilitation from logging activities, there is potential for approximately 5.1 miles of trails to be closed for a season to allow the impacted portions of the trails to recover to their pre-project condition.

Leave residual merchantable sized trees live or dead along trails close enough to be used as barriers capable of lining both sides of the trail (roughly 10-20 feet from the sides of trails depending on tree size, terrain, and sub-merchantable material) space a distance of half a tree height to ensure enough material will be present post-harvest to line trails with barrier trees where material is present. Where available sub-merchantable material should be left an adequate distance from the side of the trail to

discourage off-trail riding (around 15-25 feet). If enough sub-merchantable material is present no merchantable material will be required to be retained. These areas will be reviewed by District Recreation personnel. Protect all sprouting species to facilitate growth of a barrier, green screen, and improve rider experience.

Maintain as many down logs as feasible to prevent off-road traffic, stabilize roadside areas, and meet other coarse woody debris objectives. Slash considered a fuels hazard or planting barrier should be, lopped and scattered, used as a barrier to off-road traffic, or piled and burned.

Maintain the smallest footprint possible in staging areas and landings, and along access roads and skid trails, while maintaining safety and operational efficiency.

OHVs trails must also be hydrologically stable, disconnected from streams and actively managed after the salvage logging projects to ensure they are not the source of water quality and soils impacts due to

damage and alteration of the OHV system from the Project.

Skid trails would be designed to best fit the terrain, minimize any erosion, and keep water from

concentrating on the route. Skid trails should be designed to not increase OHV trail erosion. The number of skids across OHV trails should be minimized. The Forest Service would approve skid trail locations prior to the operation.

Where possible an attempt should be made to visually and physically disconnect OHV trails from skid trails as such junctions will encourage OHV trespass and associated erosion. Skid trails would be covered with brush leading to at least 30% cover in areas of sensitive and erodible slopes.

Return the route prism to OHV use with the associated management of the trail system including the installation of water bars [rolling dips and/or catch basins] and trespass barriers and the reduction in trail width through the use of slash, downed trees or other impediments to erosion. This includes on-going management of the trail system through regular maintenance into the future such that erosion issues on trails are addressed in a timely manner.

Special use permitted OHV events historically have (and may again) take place on several Forests within the Project area. These events often use the majority of the OHV trail system. Ensure designated OHV 3

trails and Level II roads within the project area are open for these events, and that equipment is not left along or near trails and/or roads that could pose a danger to the public.

Weekend and Holiday Use: Ensure all level II roads and designated OHV trails are opened for weekend and holiday use periods. Trails and roads need to be free and clear of activity generated hazards and debris, such as, equipment, slash, brush and logs, before opening units for the public weekend use.

Public Safety: Temporarily close segments of level II roads and designated OHV trails that are within or leading into the project units during treatment activities. This may be accomplished by placing warning and/or closure signs in locations that ensure maximum visibility, making sure that all OHV routes to project area are secured. Signs are most effective if they are reflective with a minimum of three inch high or greater lettering. See unit specifications for sign placement locations.

OHV Campgrounds/Staging Areas: Will be protected and boundaries are to be flagged by District recreation or OHV staff. Improvements will be protected and trees will be dropped away from restrooms, picnic tables, fire rings, vehicle barriers, signs and campground roads and spurs. If these improvements need to be moved for project activities they need to be reinstalled in the same location and in pre operation condition. Cull logs may be placed around campground perimeter, in coordination with District OHV Staff, in order to reduce off-route travel and hill climbs by motorized vehicles adjacent to campgrounds.

Protect Improvements Such as Level II Roads and OHV Trails: Leave residual merchantable sized trees along trails and level II roads close enough to be used as barriers capable of lining both sides of the trail or road (roughly 10-20 feet from the sides of trails/roads depending on tree size, terrain, and sub-merchantable material) space a distance of half a tree height to ensure enough material will be present postharvest to line trails with barrier trees where material is present. Where available sub-merchantable

material and vegetation should be left an adequate distance from the side of the trails and roads to discourage off-trail riding and vegetative roadside/trailside screens (around 15-25 feet). Openings in understory vegetation adjacent to trails should be minimized. If openings are created, brush or slash should be placed immediately adjacent to the trailside in order to discourage off-trail travel. As needed, high stump trees that have and should continue to serve as "trail anchors." If enough

sub-merchantable material is present no merchantable material will be required to be retained. Layout of these areas will be reviewed by District OHV personnel.

Mechanical Repair Work, Protection of Improvements: If designated level II roads or OHV trails are damaged an attempt will be made to repair damage. If repairs are not in accordance with Forest Service design standards, additional repairs will be required to meet standards.

District OHV personnel will be available to assist timber sale administrators in inspecting any repair work required on designated OHV trails.

Felling: Directional felling will be used around trails for protection of improvements. If it becomes necessary to fell trees into or across designated OHV trails or level II roads an attempt will be made to remove slash, debris and repair trail tread and vegetative openings. 4

Skidding: Crossing of a designated OHV trail or level II road with logs or equipment may only be done at designated skid crossings to minimize damage or impacts to the trails/roads and protect improvements. An attempt should be made to use cull logs at road and trail crossings to protect tread surfaces from becoming uncompact. Cull logs or other natural barriers would be used adjacent to roads and trails to block skid openings, to reduce off-trail / off-road travel and control erosion. If material is unavailable water bars would be placed on both sides of roads and trails. Any openings between roads and trails that are created should be removed by placing slash, water bars or other natural barriers along skid trails to reduce off-trail / off-road travel and erosion. Layout of skid crossings that cross designated OHV trails or Level II roads will be coordinated between OHV staff and timber personnel. If designated level II roads or OHV trails are damaged an attempt will be made to repair damage. If repairs are not in accordance with Forest Service design standards, additional repairs will be required to meet standards.

Hauling: should be restricted to existing Forest Service roads or temporary roads. Designated OHV trails should not be converted to temporary roads for project activities unless otherwise noted in the unit specifications. If designated OHV trails are damaged there will be an attempt to repair damage. If repairs are not in accordance with Forest Service design standards, additional repairs will be required to meet standards.

D36 appreciates its long-standing partnership with Region 5 in support of managed Forests that provide sustainable and high-quality OHV routes for both casual use and permitted events. Please feel free to contact me with any quest