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Comments: Comments on the Central Zone Region 5 Post-Disturbance Hazardous Tree Management EA are attached.

The following comments on the Central Zone Post-Disturbance Hazardous Tree Management Projects are from the California Forestry Association (Calforests).

Calforests is a trade association whose membership includes California sawmills, veneer mills,

several biomass powerplants, and private industrial and non-industrial forest landowners. Having open, safe forest service system roads (Maintenance Level 2, 3, 4, 5) are of utmost importance for administrative, public, and commercial use. Without safe roads, there will be no vegetation management.

Calforests, in general, supports the proposed action for each of the three Environmental Assessments (EAs), one for each Zone (North, Central Sierra, and Southern Sierra). We have several specific comments that are made to the Central Zone EA, but we believe they are comments that are appropriate for all three EAs. However, since there are some differences in the North and South Zone EAs, I will likely comment on each of them as well later during the comment period.

EA (Central Zone)

Page Number

Comment(s)

3 It is unclear why the Tahoe, Eldorado, Stanislaus, and LTBMU are not included in their particular Zone EAs.

9 Activity-generated wood fuels [ndash] discusses hand piling but does not discuss machine piling, which is allowed and will be the dominant method of slash disposal. Further, hand piling should be avoided as it is expensive and creates [ldquo]jackpot[rdquo] piles that the burning crew in future burn windows would have to return and burn. This has been recurring problem all over the Region in that insufficient burn windows, and insufficient burning crew time to burn the piles, leaves piles on the landscape for years putting them at risk to fueling another wildfire.

10 It is not clear why roadside hazard trees would not be removed where adjacent to Inventoried Roadless Areas?

11 No Action, 2nd paragraph, 2nd line [ndash] Numerous killed or damaged trees are not only adjacent to National Forest system roads, but also adjacent to National Forest system trails.

12 Sixth line from top of page --Same comment as #11 above [ndash] there is a safety threat to not just the road corridor, but also to the trail corridors. Further, trails can also serve as evacuation routes.

38 Under Cumulative Effects, last paragraph, clearcutting is mentioned. Sierra Pacific Industries (SPI) is the private industrial landowner that uses an even-age management system. They also have specific mitigation measures they incorporate. First, on slopes less than about 35 percent, they contour till (subsoil) after harvesting. Their 4-year research study[1] shows [ldquo]on moderately sloped sites affected by high-severity forest fires, salvage logging[mdash]particularly when implemented immediately post-fire[mdash]can substantially reduce

erosion.[rdquo] On steeper slopes, SPI cuts and processes trees in the woods uniformly spreading the tops and limbs in the harvest unit. Review by a Tahoe National Forest soil scientist and hydrologist, the post-harvest looks like a [ldquo]carpet[rdquo] of fine fuels. They could find no compaction or rills (that would indicate overland flow).

39 Aquatics and Fisheries T,E, and S Species Effects from No Action

Sediment delivery post-fire does not always return to baseline in about [ldquo]2 years[rdquo]. The Star Fire (Tahoe and Eldorado NF, 2001 in the Rubicon watershed) is still today producing sediment that ends up in the Placer County Oxbow Reservoir municipal water supply (personal communication, Andy Fecko, General Manager, Placer County Water Authority (PCWA)). There is a similar long-term expectation of sediment delivery from the King Fire (Eldorado NF 2014) to the Rubicon River and the Placer County municipal water supply. PCWA Consulting Hydrogeologist, Marie Davis, can provide annual estimates of sediment from the King Fire going into the Rubicon River.

39 Aquatics and Fisheries T,E, and S Species Effects from the Proposed Action

As stated above in our comment to Page 38 [ndash] salvage logging with ground-based equipment leads to an erosion reduction compared to No Action. Part of the erosion reduction on high severity with salvage logging is due to ground-based equipment breaking up the hydrophobicity, hence, improving water penetration.

41 Fuels and Fire Hazard: Ground Fuels

Fuels and Fire Effects from No Action

3rd paragraph, 4th sentence [ndash] Natural tree regeneration will also be hampered by lack of seed-producing live trees.

42 Fuels and Fire Effects from the Proposed Action

1st paragraph, 1st sentence [ndash] [ldquo]88 percent of all wildfires nationwide are caused by humans. Of these human-caused wildfires, 95 percent occurred within [frac12] mile of a road[rdquo][1] (May 2007. Peter Morrison. Pacific Biodiversity Institute. Roads and Wildfires.

60 Soils [ndash] All Zones -- SA-5

Nowhere in the document is winch-assist mechanical included. Winch-Assist has been used the past several years on Sierra Pacific Industries in the central Sierras and on Campbell Global in NE CA. Winch-Assist has demonstrated that it can perform selective harvesting and processing in the woods with a winch assist harvester/processor and removal with a winch-assisted forwarder or a skyline with grapple. 55 percent sideslope is common but the equipment can efficiently and effectively operate on steeper slopes than 55%. The harvester/processor cuts, delimits and tops in the woods and uniformly scatters the slash including in front of the machine to serve as a mat and allows the machine to punch the slash into the soil by [ldquo]walking[rdquo] over it. Demonstrations have been provided to the Lassen, Plumas, and Tahoe NFs. A Tahoe Soil Scientist and Hydrologist reviewed a post-harvested unit on 55% on Sierra Pacific Industries and found no sign of soil displacement or compaction and no overland flow from runoff.

63 Watershed [ndash] All Zones [ndash] HA-8

Dead trees do not provide bank stability; they lose their soil-root strength.

64 Watershed [ndash] All Zones [ndash] HA-10

As mentioned in comment for page 60 [ndash] again, winch-assist is not considered in the aquatic zone on slopes greater than 35% for low and unburned soil burn severity and greater than 25% for high or moderate soil burn severity. It is not clear what it is you are trying to protect?

Calforests appreciated this opportunity to provide comments to the Draft EAs. Last, we would encourage the Region to pursue the Emergency Situation Determination. As part of this assessment, Region 5 has identified 6,000 miles (400,000 acres) of affected by post-disturbance hazard trees. The hazard trees will generally only have economic value for about 2 years following the disturbance. Further, moving the affected 6,000 miles to a safe condition for public, administrative, and commercial use is of utmost importance.

[1] - http://pacificbio.org/publications/wildfire_studies/Roads_And_Wildfires_2007.pdf

[1] - <https://academic.oup.com/forestscience/article/64/3/246/4969204?login=true>