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Comments: Comments from Calif. Forestry Assoc. on the North Zone EA/FONSI attached

File Code: 1950

Subject: April 8, 2022, Posting of the Forest Service Region 5 Post-disturbance Hazardous Tree Management Projects Draft EA and Finding of No Significant Impact (<https://www.fs.usda.gov/project/?project=60950>)

Comments submitted electronically

To: Jennifer Eberlien, Regional Forester

The following comments on the North 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 North Zone EA, but we believe they are comments that are appropriate for all three EAs.

EA (North Zone)

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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?

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11 No Action, second paragraph, second 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.

16 Part of the Slater Fire was also on the Klamath Natl. Forest and the Rogue-Siskiyou Natl. Forest.

Information is provided regarding fuel loading on the Eldorado, Stanislaus, Sierra, and Sequoia Natl. Forests. Isn[rsquo]t there data also available for the Klamath Mountains and portion of the Coast Range on the Mendocino and Six Rivers Natl. Forests?

29 Last Paragraph [ndash] Giant Sequoias are mentioned. Are there Giant Sequoias in the North Zone or did you mean redwood?

45 Fuels and Fire Effects from the Proposed Action

Roads with hazard trees removed for up to 300[rsquo] on each side will create safe Evacuation Routes for administrative, commercial, and public egress. They also would provide for safe ingress and egress of fire suppression equipment.

62 Appendix B, Soils SA-2; SA-5

The SA-2 Design Feature completely ignores the capability of winch assist processors and forwarders that have demonstrated they can be used on slopes averaging 55 percent (Sierra Pacific Industries, Tahoe District, Eric Sweet, District Manager). Review by Tahoe Natl. Forest Soil Scientists and Hydrologists on a completed SPI 55 percent harvest unit on the SPI Tahoe District, where winch assist equipment was used for the harvesting operation found no compaction and no overland flow.

The SA-5 Design Feature also completely ignores the capability of winch-assist harvesting machinery to uniformly scatter slash and [ldquo]walk[rdquo] over it with the equipment to punch the slash into the soil.

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65 Appendix B, Watershed HA-1

It is not appropriate to call for Wet Weather Operation Standards [ldquo]within[rdquo] the normal operating season. Wet weather operation standards should only apply outside of the normal operating season except for unusual storm events.

66 Appendix B, Watershed HA-6

It is not appropriate to limit fueling a chainsaw only on a landing.

66 HA-10

See response above regarding use of winch-assist equipment.

66 HA-11

There is no mention of allowing use of equipment that can provide full suspension of wood products from the EEZ. Equipment can sit at the edge of the equipment exclusion zone and reach in with the hydraulic boom and grapple to secure and lift wood products out of the EEZ.

68 BA-4

See response to HA-11. Ground disturbance can be avoided with equipment that sits on the edge of the EEZ and reached in with hydraulic boom and lifts and fully suspends wood products.

78 CA-8

Design Feature should be modified to allow mechanized equipment to be able to sit at the edge of the flagged boundary, reach in, and fully suspend removal of fuels/trees. As the Design Feature currently reads, equipment could only reach in and suspend removal if the equipment is sitting on an existing road prism.

Calforests appreciated this opportunity to provide comments to the North Zone Draft EA. 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.