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First name: Jerry

Last name: Jensen

Organization:

Title:

Comments: Dear Jason,

Your scoping letter dated July 20, 2023, requested additional comments on the Stanislaus NF Hazard Tree project.

I agree that there is a need to reduce public safety hazards along portions of roads, trails, and facilities (campgrounds, trail heads, administrative sites) of the Stanislaus NF. The scoping document outlines the processes necessary to mitigate these hazards, namely the felling of hazard trees with chainsaws. Tree falling is an extremely dangerous profession, even in stands of green timber. Those dangers are elevated when felling dead and dying timber. Those dangers are elevated even further when the felling of those dead and dying trees is delayed as the structural integrity of trees is diminished as rot and deterioration progress. Therefore, I urge the Forest Service to strive toward expedient completion of this analysis to permit the safest work environment possible for those forest workers tasked with the felling of these hazard trees.

There is also a need to reduce fuel loading associated with felled hazard trees adjacent to portions of roads and trails, and near facilities (campgrounds, trail heads, forest service offices). There is opportunity for recovery of trees identified for removal in a manner that will not only address public safety risks and reduce fuel loading but also provide timber products to the local industry and generate income to the Forest Service. This opportunity can only be realized if implementation of the proposed EA is executed in a timely manner and dead timber products are manufactured before their value is lost to decay, stain, or insect damage.

Adequate documentation of the Field Guide for Danger-Tree Identification is advisable given the ongoing challenges by special interest groups against hazard tree removal. Recent court rulings have indicated some confusion regarding the use of the Field Guide to identify hazard trees that have potential to impact roads. In particular, there have been questions regarding whether a specific tree poses an [ldquo]imminent[rdquo] hazard. Therefore, I recommend that you highlight and outline certain components of your guidelines in the final Decision-Memo/Notice including:

- * Thorough explanation of tree falling dynamics on level ground, including the effects of wind events, force of breakage, and how fallen trees may impact other nearby trees (causing broken tops, etc.)
- * Thorough explanation of tree falling dynamics on sloped ground, including the likelihood of downslope trees falling uphill
- * Emphasis on how the Danger Tree Guidelines identify both the [ldquo]Tree Failure Potential[rdquo] and the [ldquo]Potential Failure Zone.[rdquo] Specifically note that any given tree has a Failure Zone and describe how that failure zone is determined.

I retired from the Forest Service as a Regional Forester's Representative (RFR) to train and certify Forest Service timber sale administrators in R5 and know from personal experience how hazardous OSHA defined danger trees can be. While it is accepted that a recently fire killed tree is not necessarily a danger tree as defined by OSHA in a roadside corridor setting, nearly all dead trees will rot and deteriorate to become danger trees to the road over time.

Sincerely,

//Jerry Jensen//

Jerry Jensen

Cc: Steve Brink, Vice President, CFA