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Comments: Please see comments in attached PDF.

Thank you

Summit Land Management is a general engineering forestry contractor located in Coarsegold with a focus on fuels reduction. We are most familiar with Sierra National Forest, but our input is applicable to both national forests. Our reasoning is based on our 40 years of experience with logging, wildfire suppression and prevention, creating large acreage shaded fuels breaks, forestry mulching and erosion control. USFS would like: "Increased pace and scale of prescribed burning and associated fuels reduction actions[...]" We agree, as long as the approach is measured and thorough. However, there are some deleterious effects if the approach is rushed and illogical. On the next two pages we have presented some Challenges and some Solutions. Thank you for taking time to consider our professional observations. Regards, ~ Mark & Sarah Campbell

CHALLENGES

- Slash piles under healthy trees. Haphazard piles full of dirt. Hundreds of tiny piles that could have been mulched or consolidated - - What factors lead to this kind of outcome?
- Contracts are often short timeframes. Is this because funding sources have unrealistic deadlines?
- Even when built correctly, piles sometimes sit for months/years. The piles become habitat for animals. Standing piles can be confusing to the public and bad PR for USFS and the contractor.
- Piles are lit by state or federal personnel but are not sufficiently tended and managed. The result is land scarring, incomplete burns, scorched healthy trees, burnt ends & pieces left behind.
- Are the terms, rules and guidelines of our local projects developed in far away offices and therefore difficult for local, understaffed, USFS personnel to implement? The results can be rushed jobs, poor quality and a breakdown in reducing the risk of large and severe wildfires.

SOLUTIONS

- Implement a Burn Boss certification (or partner with Cal Fire's). We have an approach which incorporates pile burning as we work through a project (safe/approved conditions only). The result is a faster, complete and thorough process which has been successful on our private and state land projects. We could achieve the same result on federal land with the ability to burn on federal land.
- Small piles are fed as we work and are tended each day until every piece is gone resulting in a hotter fire with less smoke.
- Pile feeding rates are adjusted depending on changing weather conditions.
- When the project is done, it's done completely. No habitat piles waiting to be burned.

OR,

- instead of / in addition to certifying contractors as Burn Boss, assign a USFS person or retired annuitant as acting Burn Boss on a project so contractors like us could more efficiently complete an operation with the method outlined above. Of course, this approach would be carried out only in favorable conditions.
- Some contracts should be long term stewardships. The more complex projects which include a variety of activities, such as timber harvest; road construction or maintenance; treatment of noxious weeds; culvert maintenance; hazardous fuel reduction; snag mitigation next to roadways; etc[...], should be assigned as long term operations. Depending on complexity, long term could mean 5+ years.
- Malheur National Forest in Oregon has had great success with 10 year stewardships. (Timber West, July/August 2022, Long-Term Stewardship Contracts and the Future Forest)- Long-term stewardships allow contractors more flexibility to navigate LOPs; extra rain or snow; impassable roads; increased fire seasons; and slow supply chain for machine repairs.
- Long-term stewardships can result in effective forest management rather than rushed jobs. Flexibility and thoroughness result in a better outcome rather than checking a box and moving on to the next project.
- Short-term (non-stewardship) contracts should be smaller acreage. For example, instead of one 1,500 acre multi-faceted project, break it down into four manageable 375 acre contracts.
- Contractors are able to more accurately bid smaller acreage projects since the amount of variables will be on a smaller scale.
- Bid dollar amounts will be more reasonable and targeted.
- More bids will be received per project which increases competition which increases forest management money spent wisely.
- Offer accessible firewood cutting for local communities. We completed a project along a forest service road and skidded long logs to turnouts. Over several months hundreds of people

took advantage of convenient firewood cutting. This is wood that would have been piled to burn or masticated. Our crew had the opportunity to interact with people and answered many questions about the whole project. Everyone was appreciative and enthusiastic. The local public takes notice of effective forest management. The result is a grateful community who will do their part caretaking our public lands. Attachments: TimberWest-
JulyAugust 22 - Long-Term Stewardship Contract and the Future Forest.pdf