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First name: Gerard
Last name: van Hees
Organization: AFRC
Title: Northern California Representative
Comments:

January 29, 2016

Patricia Grantham, Forest Supervisor
Klamath National Forest
1711 South Main Street
Yreka, CA 96097
Dear Patty:

Thank you for the opportunity to comment on the Craggy Vegetation Management Project (Craggy).

American Forest Resource Council (AFRC) is a regional trade association whose purpose is to advocate for sustained yield timber harvests on public timberlands throughout the West to enhance forest health and resistance to fire, insects, and disease. We do this by promoting active management to attain productive public forests, protect adjoining private forests, and assure community stability. We work to improve federal and state laws, regulations, policies and decisions regarding access to and management of public forest lands and protection of all forest lands. AFRC represents over 50 forest product businesses and forest landowners throughout the West. Many of our members have their operations in communities adjacent to the Klamath National Forest, and the management on these lands ultimately dictates not only the viability of their businesses, but also the economic health of the communities themselves. The state of California forest sector employs approximately 20,000 Californians, with AFRC's membership directly and indirectly constituting a large percentage of those jobs. Rural communities, such as the ones affected by this project, are particularly sensitive to the forest product sector in that more than 50% of all manufacturing jobs are in wood manufacturing.

The proposed project has identified the following purpose and need for action. It includes:
1.Fuel Breaks along strategic roads
2.Prescribed burning
3.Mastication
4.Thinning without removal of forest products
5.Thinning with removal of forest products

The analysis needs to display how long the treatments will be effective in meeting the designed purpose and need. All the proposed commercial units are in the Matrix land allocation. In order to meet the desired condition for ecological restoration and fuels management the treatments will need to be intensive enough to be effective for a considerable period of time.

Currently there are planned 1,770 acres of harvest of forest products in plantations and 1,110 acres in natural stands. Planned for skyline yarding is 1,150 acres and ground based is 1,730.

Road construction items include constructing dips at stream crossings, out sloping road surfaces, upgrading culverts, and applying rock aggregate. There is also approximately 2 miles of temporary road planned in the project. All of these items if included in the forest product removal portion of the project will be very expensive and will probably exceed the value of the forest products.

Constructing forest roads is essential if active management is desired, and we hope that the Forest Service is proposing to construct roads that are needed to access and treat as much as the project area as possible in an economically feasible way. Proper road design and layout should pose little to no negative impacts on water quality or slope stability. Consistent and steady operation time throughout the year is important for our members not only to supply a steady source of timber for their mills, but also to keep their employees working. These two values are intangible and hard to quantify as dollar figures in a graph or table, but they are important factors to consider. The ability to yard and haul timber in the winter months will often make the difference between a sale selling and not, and we hope that the Klamath National Forest is working to accommodate this.

Design feature Watershed 3 states that the project is to take place during the normal operating season of May 1 through October 31 for all units and Wildlife 3 states that there will be a seasonal restriction of February 1st through September 15th. This leaves a possible operating window of approximately 45 days. These kind of limited operating restrictions decrease the viability of this project being successful.

The timber products provided by the Forest Service are crucial to the health of our membership. Without the raw material sold by the Forest Service these mills would be unable to produce the amount of wood products that the citizens of this country demand. Without this material our members would also be unable to run their mills at capacities that keep their employees working, which is crucial to the health of the communities that they operate in. These benefits can only be realized if the Forest Service sells their timber products through sales that are economically viable. This viability is tied to both the volume and type of timber products sold and the manner in which these products are permitted to be delivered from the forest to the mills. There are many ways to design a timber sale that allows a purchaser the ability to deliver logs to their mill in an efficient manner while also adhering to the necessary practices that are designed to protect the environmental resources present on Forest Service forestland.

The primary issues affecting the ability of our members to feasibly deliver logs to their mills are firm operating restrictions. As stated above, we understand that the Forest Service must take necessary precautions to protect their resources; however, we believe that in many cases there are conditions that exist on the ground that are not in step with many of the restrictions described in Forest Service EIS's and contracts (i.e. dry conditions during wet season, wet conditions during dry season). We would like the Forest Service to shift their methods for protecting resources from that of firm prescriptive restrictions to one that focuses on descriptive end-results; in other words, describe what you would like the end result to be rather than prescribing how to get there. There are a variety of operators that work in the Northern California market area with a variety of skills and equipment. Developing an EIS and contract that firmly describes how any given unit shall be logged may inherently limit the abilities of certain operators. For example, restricting certain types of ground-based equipment rather than describing what condition the soils should be at the end of the contract period unnecessarily limits the ability of certain operators to complete a sale in an appropriate manner with the proper and cautious use of their equipment. To address this issue we would like to see flexibility in the EIS and contract to allow a variety of equipment to the sale areas. We feel that there are several ways to properly harvest any piece of ground, and certain restrictive language can limit some potential operators.

AFRC wants to go on record in support of the Craggy Project. Thank you for the opportunity to comment on the proposed project and please keep us informed on the progress of NEPA. We are also interested in any field trips that may be set up for this project.

Sincerely,

/s/Gerard MJ van Hees

Gerard MJ van Hees
AFRC, Northern California Representative
17911 Fisher road
Weed, CA 96094
Cell Phone: 541-892-2945
E-mail: jvanhees50@gmail.com