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Comments: Region 5 Appurtenant Road Plan for Post-Disturbance Hazardous Tree Management

Because the Proposed Action for Region 5 Post-Disturbance Hazardous Tree Management includes the use of thousands of miles of road that lead to NFS facilities and activities that fell and remove large-diameter hazard trees, following this management plan, I recommend adding provisions to the Post-Disturbance Hazardous Tree Management for appurtenant roads that lead to road maintenance, facilities, and tree removal. Increased use of roads, skids trails, and bare soil areas increase sediment pollution and cumulative instream impacts for decades. This may be prevented or controlled with the employment of the following appurtenant road plan that has been used for industrial timber company habitat conservation plans. I recommend the following be included in the USFS LRMP to improve habitat for the living ecosystem. I find these comments necessary for inclusion into the USFS Region 5 Post-Disturbance Hazardous Tree Management Plan because the Appendix B Project Design Features and Best Management Practices listed fails to describe a systematic approach that addresses the prevention of sedimentation from harvest of post disturbance hazardous tree removal practices; this element is an important issue in these stressed watersheds that are currently sediment impaired.

Control of Sediment from Appurtenant Roads and Other Sources for Post-Disturbance Hazardous Tree Management.

Soil and Sediment Assessment: USFS guidelines for Region 5 Post-Disturbance Hazardous Tree Management must include appurtenant road guidelines that include a post-fire road condition inventory and sediment assessment, site prioritization, work schedule, and routine post-construction inspections of work that reduces the potential for sediment to enter streams in logging areas.

Logging Area means that area on which hazard tree operations are being conducted as shown on the maps accompanying the plan, and within 100 feet, as measured on the surface of the ground, from the edge of the traveled surface of appurtenant roads being used during the harvesting of the particular area.

Appurtenant Roads are the traveled surface of such roads that lead to is the logging area and roads shown on maps on the plan.

1.USFS will assess the existing road network and associated sediment sources on its lands either within five years. As planned logging areas are selected, stormproofing guidelines must be implemented on appurtenant roads. Inventories will be updated within five years of the actual stormproofing. The road assessments will be conducted according to agency standards. When used in this plan, the term stormproofing describes a process that involves the following elements: The assessments follow agency protocols. Generally, a trained observer walks a road segment looking for actual or potential occurrences of erosion, slippage, mass wasting, blocked or perched culverts, or other sediment sources. The assessment documents instances of Humboldt crossings, unstable fillslopes for roads and landings, water crossings that have a moderate to high potential for culvert blockage and/or diversion of stream flows onto the roadbed, insufficient drainage, and diversions of road drainage directly into streams.

2.The Inyo, Klamath, Lassen, Mendocino, Modoc, Plumas, Sequoia, Shasta-Trinity, Sierra, and Six Rivers within the North, Central, and Southern Sierra National Forests assessments must be following a prioritized order. Adjustments to the priority list above shall be made in consultation with the wildlife agencies.

3.Post-fire implementation on appurtenant roads- all high and medium priority stream crossing, road fill failure,

and hydrologically connected sites that deliver sediment to streams will be stormproofed and rehabilitated temporarily after use and permanently within five years of completion of the assessments, and all stormproofing will be completed within 20 years of the effective date on all National Forests project Areas listed in the scoping of this project Table 1.

4. Road/Landing Stormproofing Roads and landings will be stormproofed if utilized to implement the hazard tree removal plan to the standards identified in the aforementioned sediment source assessment within the first 20 years of the effective date, at a minimum rate of 1,000 - 5,000 miles per decade and 100 - 500 miles per year. Stormproofing conducted as part of Region 5 Post-Disturbance Hazardous Tree Management will count towards the yearly and per decade totals. Stormproofing completed to the standards identified by agencies prior to issuance of these provisions will also count towards the first decade totals. Roads and landings that are closed or decommissioned according to the standards are also considered stormproofed and can be counted towards the yearly and per-decade totals.

5. For purposes of this Region 5 Post-Disturbance Hazardous Tree Management appurtenant road plan, a road will be considered upgraded when it is well-drained and shows no signs of imminent failure (e.g., as evidenced by slumping scarps or cracks in the road fill) which would deliver sediment to waters. Actions necessary to upgrade a road include the installation of ditch relief culverts and/or rolling dips where significant downcutting of the ditch is noted and removal or stabilization of unstable till material at sites showing signs of imminent failure which could impact waters.

6. All roads, including drainage facilities and landings, shall be inspected annually for five years after operations, at a minimum. Conduct inspections before rains, during winter, and after rains to apply adaptive management knowledge for future use.

7. All road use is permitted only if the road is dry or first rains (May 1- Oct 31).

8. No new landing or haul road construction is permitted.

The protection measures listed in the appurtenant road plan for the Region 5 Post-Disturbance Hazardous Tree Management shall be implemented to minimize or eliminate potential negative effects, or to comply with the LRMP, laws, regulations, and policy.

Sincerely,
Todd Kraemer