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Comments: Project # 65796

Mokelumne Amador Calaveras Forest Resilience Project

I am commenting on the scoping for this project on behalf of the Associated California Loggers (ACL).

The ACL is a Non-Profit Organization with close to 500 members, which includes loggers, trucking companies, equipment manufacturers, foresters, engineers, and individuals concerned about keeping our California forests sustainable, producing wood products for the American people, and supporting rural communities. A project such as this should consider the economic value of supplying a forest product component to meet the spirit of the National Forest Management Act. That is to provide sawtimber that includes a certain amount of board-foot yield per acre per year to sustain and protect the landscape the project title purports, Forest Resilience. In other words, trees must be cut to save the forests. This means cutting trees of all age classes, especially for Aspen release. The thirty-inch Rule has been in place for nearly 35 years and has proven to be a bad idea in protecting critical wildlife habitats for all species, not just the spotted owl. ACL supports this project; however, trees of all diameter classes must be part of the silvicultural prescriptions. Small tree mastication and hand-thinning small-diameter trees on a landscape level will not be adequate to reach your objective. Furthermore, this project will repair and mitigate the erosion issues associated with the existing National Forest System Roads within the project boundaries, improving water quality. ACL membership is the boots on the ground for accomplishing the objectives of this project.