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Organization:

Title:

Comments: To District Ranger Gassman:

The following are comments pertaining to the Pine Phlats Project.

Proposed Vegetation Treatments -

What is a clearcut with leave trees; is this a seed tree prescription?

Intermediate Harvest and Commercial Thin -

There is no mention of the existing tree density (TPA or BA) and desired end result in either TPA or BA. I think you should provide a better description in the scoping document as to the existing condition and the desired end.

"More specific unit prescriptions would be developed during the next phase of the project, following more in-depth field reconnaissance." Seeing how this is the only opportunity to comment on this project, I think more details should have been included in the scoping document.

I would suggest that you drop unit 37 and use these acres (589 acres) in higher priority areas that need fuel reduction and silvicultural treatment. The area north of the Bobtail Cutoff Road and east of the Pipe Creek Road are higher priority areas.

The commercial thinning in the second growth stands is needed and will promote a fully stocked stand and reduce the fuel component. The only issue I see with this treatment is the low value of second growth timber, especially bull pine. The timber harvest in these units may need to be subsidized to be feasible. Hopefully your feasibility analysis for the project reflects the lower volume per acre harvested and the lower value.

Transportation Management

With seven miles of temporary roads identified for the project and the soil concerns mentioned in the document I would suggest that you include Regional Special Provision - C(T)5.102# - Construction Of Temporary Roads as a design feature in the CE and included in the timber sale contract. This provision requires temp roads to be constructed and closed in accordance with the attached plans and specifications included in the provision. (Note if using a Stewardship Contract the provision will have different number.)

I am confused about the need for an agreement with the county to use county roads. The Forest Service and timber companies haven't needed any agreements to haul logs over county roads in the past. Also the Forest Service has never collected recurrent or deferred road maintenance on timber sales where the haul route was over county roads.

Soils

"Harvest in units 234, 301, 531, 532, 534, 535, 551, and 552 would occur on a slash mat using a log forwarder to reduce impacts." I doubt you will generate enough slash to build a slash mat in the intermediate harvest units. Also you are needing a cut to length system rather than a forwarder. (Unit 552 is not listed in Table 3.)

Non-Sawtimber

No place in the scoping document do I see any mention of including the removal of non-sawtimber products. Including C(T)2.2# - Utilization And Removal Of Included Products and C(T)2.211# Optional Removal Of Non-SawtimberProducts in the contract will help reduce logging slash and on-site fuel loadings. I have seen numerous harvest units that have included non-sawtimber removal that have not required any further piling following the removal of this material.

Feasibility Analysis

It would have been helpful if you had included the results of your feasibility analysis for this project. (A feasibility analysis is required to be completed during the initial planning of a timber sale project as per Forest Service Handbook 2409.18 - Timber Sale Preparation Handbook.) I assume based on the amount of commercial thinning, low value timber, timber volume removal and costly items such as hand piling, mastication, road reconstruction and soil restoration that this project will be implemented using a stewardship contract or an agreement. Regardless of what type of contract is to be used it would be nice to know how much supplemental funding will be required and where the funds are coming from.

I made a few assumptions in reviewing this project that may not be justified due to the lack of information. As with any project I think full disclosure is important in order to evaluate the project and make comments.

Signed - John Craig