



March 27, 2019

Russell Nickerson, District Ranger
Almanor Ranger District, Lassen National Forest

In Reply To: Wilson Fire Salvage Project

The American Forest Resource Council (AFRC) provides the following scoping comments on the proposed Wilson Fire Salvage Project. 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.

AFRC is glad to see the Almanor Ranger District is proposing removal of fire killed trees that will likely provide useful timber products to our membership. Our members depend on a predictable and economical supply of timber products from Forest Service land to run their businesses and to provide useful wood products to the American public, and we appreciate the Lassen National Forest for contributing to this supply.

There is a need to move quickly to begin burned area restoration including removal of burned trees while they still have economic value, so reforestation can be completed before competing vegetation occupies the site.

AFRC supports the Proposed Action, to utilize mechanical harvesting on 115 acres to remove fire-killed and fire-injured trees to reduce roadside hazards and recover timber value before marketability is drastically reduced. The following comments are submitted in support of the purpose and need, proposed action and implementation of effective and economically efficient projects.

- 1) AFRC believes the goal of any Forest Service vegetation management project (including fire salvage) should be to meet the stated project objectives to the maximum effectiveness and extent across as many acres of the project area as possible. Maximize the use of commercial fire salvage where applicable to recover economic value of fire killed and damaged trees to reduce safety hazards and future fuel loads, adequately prepare sites for conifer regeneration,

and improve the ability of stands and the landscape to withstand the adverse effects of future fires. Table 2 indicates that 86% of acres burned at moderate to high basal area mortality would be harvested, with the exception of 19 acres where slopes exceed 35%.

- 2) Why is reforestation not included in the proposed action? Maximize reforestation to expedite restoration of forest cover following R5 Minimum and Recommended Stocking Requirements (*FSH 2409.26b Reforestation Handbook, 4.11a*). Planned fuels reduction could also serve as site preparation for tree planting. These requirements should be added to the Silviculture Design Features. It is important to restore conifer stocking before competing vegetation occupies the site.

There is land suitability class (NFMA) information that applies to all Forest plans. Each land suitability class has an associated regulation class. The Lassen NF Land and Resource Management Plan (LRMP) prescriptions “T” and “V” are regulation classes “1” and “2” meaning present and future scheduled timber harvest is a primary expectation. That is one reason why site productivity (full stocking) needs to be maintained or restored on these burned sites.

- 3) Design timber sale with merchantable material offered by the ton with minimum merchantable specifications of 33% to an 8 inch top.
- 4) Thank you for including location of a potential water source on the project map. We recommend that adequate water source(s) that normally carry the minimum necessary flow for drafting to occur be identified before completing the appraisal and then appraise for use accordingly.

Please keep me informed as the project progresses.

Sincerely,

/s/Scott Stawiarski

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cc: AFRC, CFA, Lassen FLT