April 15, 2019

Michael Woodbridge, District Ranger
American River Ranger District, Tahoe National Forest

In Reply To: Michigan Bluff Project

The American Forest Resource Council (AFRC) provides the following scoping comments on the proposed **Michigan Bluff 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.

We are glad to see the American River Ranger District is proposing vegetation management that would meet multiple objectives and likely provide useful timber products to our membership. Our members depend on a predictable and economical supply of timber products off Forest Service land to run their businesses and to provide useful wood products to the American public, and we appreciate the Tahoe National Forest for contributing to this supply.

AFRC supports the proposed action because it includes 925 acres of commercial thinning utilizing tractor and skyline yarding systems. In addition, the proposed action includes 1,792 acres of mastication and prescribed fire to create 4.3 miles of roadside fuel breaks. Hazard trees would be removed on 13 miles of road in the projects area.

1) Maximize Acres Thinned for Forest Health Restoration

   We support thinning overstocked stands to improve forest health and reduce hazardous fuel loading wherever it is needed. We appreciate the District's consideration of skyline yarding systems (179 acres) to treat slopes greater than 35%. It makes sense to effectively treat as many acres as possible when planning projects in the area.

2) Design Effective and Economically Efficient Thinning Projects

   We support silvicultural prescriptions based on one effective thinning entry every 20 years. Heavier thinning on a 20-year cutting cycle would meet forest health objectives for a longer

American Forest Resource Council
700 N.E. Multnomah, Suite 320 • Portland, Oregon 97232
Tel. 503.222.9505 • Fax 503.222.3255

timeframe, create conditions more conducive to the establishment and growth of shade intolerant species, and provide sufficient value (sawtimber) to be economical. Stand Density Index (SDI) is an excellent measure of stand stocking density and vigor and can be used to determine effective tree stocking densities over time to meet forest health objectives

Timber sales with low volumes per acre and small diameters have high logging cost and may not be economical to harvest. A minimum sawtimber volume of **5 mbf** per acre in tractor units and a minimum volume of **10 mbf** per acre in skyline units, would make a difference in economic viability. To be viable, skyline harvesting should also have a minimum sawtimber volume of 2-3 mmbf with enough acres to cover 2 to 3 months of work for a yarder (2 to 3 months of normal operating period allows time to work around the LOPs to complete the work).

Overly conservative thinning prescriptions resulting in low volume per acre would be less forest health effective and could contribute to no bid sales resulting in implementation of the no action alternative.

3) Reduce Equipment Operating Restrictions on Slopes Greater than 35%

Please analyze an alternative that includes a non-significant Forest Plan Amendment to allow a one-time use of mechanical equipment on slopes greater than 35% (where applicable).

In conjunction with cable harvesting on steeper slopes, there are opportunities to use certain mechanical ground based equipment such as feller bunchers and processors on slopes greater than 35% to make cable yarding more efficient and effective. Allowing the use of processors and feller bunchers can greatly increase economic viability. It can also facilitate the removal of small diameter biomass material. You cannot remove biomass with a skyline yarder alone due to the expense. Small trees could be bundled with a feller buncher for removal using the skyline system. In some cases, disturbance could be reduced by decreasing the amount of cable corridors, decreasing damage to the residual stand and providing a more even distribution of woody debris following harvest.

Mechanical equipment can be effective on steep slopes combined with skyline systems. Harvesting steep slopes with tethered machinery (winch assist) is a promising new technology (see attached “Tethered Equipment on Steep Slopes: Soil-Machine Interaction”).

4) Water Drafting Sites

Include the locations of approved water drafting sites on project maps. 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.

Thank you for the opportunity to comment. Please keep me informed as the project progresses.

Sincerely,

/s/ *Scott Stawiarski*

Scott Stawiarski
AFRC Consultant
464-600 Quail Lane
Janesville, CA 96114
(530) 355-7163
sstawiarski@amforest.org
American Forest Resource Council

cc: AFRC, CFA, Tahoe FLT

Attachment