



August 28, 2018

Eli Ilano, Forest Supervisor  
 Tahoe National Forest  
 631 Coyote Street  
 Nevada City, CA 95959

**In Reply To:** AFRC Tahoe NF Buckeye Project Field Review

Dear Eli,

This letter recaps our field meeting on the American River Ranger District on August 21. AFRC comments and recommendations are included. We appreciated meeting with you and your staff.

**Attendees**

<b>Forest Service</b>	<b>Representing</b>	<b>Industry</b>	<b>Representing</b>
Eli Ilano	TNF Forest Sup	Scott Stawiarski	AFRC
Michael Woodbridge	TNF ARRD DR	Steve Brink	CFA
Liz Berger	TNF - SO	Jim Burk	Wheelabrator Energy
David Fournier	TNF - SO	Scott Pedersen	Rio Bravo Rocklin
Brad Seaberg	TNF - SO	Greg Kostick	Trinity River LC
Brian Crawford	TNF	Ken Wilde	SPI
Ian Turner	TNF		
Eric Burke	TNF		

We met at the Sierra Nevada Conservancy (SNC) office in Auburn. A short meeting was held in the office before departing for the field.

Partnerships - The Forest has a number of current and planned partnerships including the Placer County MSA, SNC GNA Project, and the Tahoe Central Sierra Collaborative which includes the

Tahoe Basin, Tahoe, and Eldorado NF. The Tahoe National Forest is actively planning and implementing projects under these types of agreements.

- We request that the Forest maintain two Programs of Work (POW). One with in-house projects including timber sales, IRTCs, and IRSCs and a second POW for similar projects to be planned and implemented through partnership agreements (MSA, GNA). This would provide a full picture of projects being proposed and implemented. MSAs are a whole separate process with their own timelines for project preparation and contract advertisements. For the Forest to get the best competitive price, contractors need to know dates and contact information.

Packaging Economical Projects - The Forest has a desire to remove biomass (small trees) especially in HHZs. Projects have been advertised but received no bids. The Forest is interested to know what kind of packaging would be acceptable? What are market conditions? If they can't award these projects using subsidized IRSCs they may be forced to move on. Discussed issues associated with the Coleman Biomass IRSC which received no offers and now Biggie, which did receive a proposal but at a price beyond the reach of the Forest.

- Maximize treatment acres. Use the value of sawtimber to offset the cost of biomass removal. Save limited funding to subsidize treatments in areas where sawtimber removal is limited.
- Design projects so the value of sawlog volume exceeds the cost of service work (biomass removal). Offer projects with a sawlog/biomass volume ratio of 70/30 when possible. Consider packaging low value biomass thinning units with higher value sawlog volume units to achieve this ratio. There needs to be an adequate sawtimber component to make projects economical for potential purchasers/contractors. The value of the timber can offset the costs of biomass removal (including IRSCs). However, site-specific appraisals have to be done. Very long haul distances for biomass can cause the costs to be as high as \$80/bone dry ton to chip, load, and haul.
- Residual stocking levels should be effective at improving forest health conditions for at least 20 years. Utilize the flexibility of averaging residual basal area per acre across each unit to improve treatment effectiveness and timber sale economics. Areas retaining above the average residual basal area (trees greater than 30 inches and no treatment areas) would have a resulting equivalent area where basal area retention is below the average. This would increase variability and allow for portions of stands to be thinned more effectively for a longer period of time and generate more volume per acre to help the project pay its way out of the woods.
- Be certain that harvest unit requirements are implementable and appraised accordingly. Having a 30% slope ground-based harvest unit below the road with no access underneath is

NOT implementable. You can't afford 30% adverse skidding either in terms of cost or ground-disturbance. Having steep slope units with skyline required that includes removal of all trees down to 3" DBH is also NOT implementable. Small trees would have to be hand-bunched and wrapped with small diameter wire rope(s) and hooked to a choker to be skyline yarded to the landing. The cost would be astronomical.

Forest Program Update - The Forest provided a spreadsheet showing sales currently awarded and sales to advertised in the 4<sup>th</sup> quarter of FY2018 and the 1<sup>st</sup> quarter of 2019 (see below). The Forest plans to offer 32 million board feet in FY2018. To date the Forest has awarded 9.9 million (30%) leaving 23 million board feet to be awarded in August and September.

## TAHOE NATIONAL FOREST TIMBER SALE PROGRAM - AFRC MEETING 8/21/2018

Tahoe National Forest FY18 Program					Advertise (Gate 4)	Bid Opening (Gate 5)	Award Date (Gate 6)	Comments
District	Sale/Contract	Contract Form	Purchaser/Contractor	Volume MBF				
AMERICAN RIVER	Park	2400-3	<i>Mark Kubich</i>	141	<b>04/03/18</b>	<b>05/03/18</b>	<b>05/07/18</b>	Awarded
TRUCKEE	Billy Hill Biomass	2400-2	<i>Cross Check Services</i>	621	<b>04/15/18</b>	<b>05/18/18</b>	<b>05/23/18</b>	Awarded
AMERICAN RIVER	China Wall TS	2400-6	<i>Sierra Pacific Industries</i>	1,926	<b>06/21/18</b>	<b>07/23/18</b>	<b>07/24/18</b>	Awarded
YUBA RIVER	Coleman Biomass IRSC	IRSC	<b>NA</b>	<del>1,542</del>	<b>06/30/18</b>	<b>07/26/18</b>	NA	No offers
YUBA RIVER	Chapman Timber Sale	2400-6	<i>Sierra Pacific Industries</i>	7,202	<b>07/18/18</b>	<b>08/17/18</b>	<b>08/20/18</b>	Awarded
AMERICAN RIVER	Biggie Phase 2 IRSC	IRSC		5,263	<b>07/17/18</b>	08/21/18	08/31/18	
AMERICAN RIVER	Mitchell Biomass	2400-2		748	08/16/18	08/30/18	08/31/18	
SIERRAVILLE	Saddle NW	2400-6		6,038	08/08/18	09/08/18	09/08/18	
SIERRAVILLE	Castle (Timber & Biomass)	2400-6		8,300	09/12/18	09/27/18	09/28/18	
ALL	Additional Volume	Various	<b>Various</b>	1,900				As of 7/31/2018
ALL	Fuelwood - Personal/Commercial	2400-1		696				As of 06/30/2018
TOTAL				32,835				

<b>Tahoe National Forest FY19 - 1st Qtr Program</b>					<b>Advertise (Gate 4)</b>	<b>Bid Opening (Gate 5)</b>	<b>Award Date (Gate 6)</b>	<b>Comments</b>
<b>District</b>	<b>Sale/Contract</b>	<b>Contract Form</b>	<b>Purchaser/Contractor</b>	<b>Volume MBF</b>				
AMERICAN RIVER	NFF French Meadows/Riparian SA	SA	<i>National Forest Foundation</i>	300	NA	NA	10/01/18	
TRUCKEE	Big Jack East	2400-13		3,700	10/16/18	11/16/18	11/19/18	
YUBA RIVER	Yuba Phase 2 IRTC	2400-13		5,000	11/02/18	12/03/18	12/06/18	
TOTAL				9,000				

Above estimates based on best information available on 08/20/2018

The Buckeye Project is in the early planning stage. Public scoping has not yet been completed.

### First Field Stop – Blue Canyon Airport

Proposed Action - Preliminary prescription is for a ground-based commercial thin to ~100 ft<sup>2</sup> basal area with 1-acre group openings on 10% of the stand and oak release followed by prescribed burning. The objective of the treatment is to increase resilience and vigor of the residual trees and create more diverse stand conditions. A secondary prescription is to remove all trees within FAA required clearance zone necessary to allow for safe night landings. Biomass removal is desired in the runway clearance zone as well as denser portions of the rest of the plantation. Stand is typical to areas identified for commercial treatment in the southern portion of the project area (Michigan Bluff and Chicken Hawk).

- Subsidize and package project as an IRSC contract when the value of sawlog volume is less than the cost of biomass removal or package as a timber sale or IRTC where the value of sawlog volume exceeds the cost of biomass removal. As described above, package projects to use the value of sawtimber to offset the cost of biomass removal. Save limited funding to subsidize treatments in areas where sawtimber removal is limited like in the south half of the project area.
- Work with adjacent landowner during design of the project. Part of the FAA clearance zone is on private land.
- Clearing within the FAA required clearance zone is for safety purposes and not regeneration harvesting. A clearcut is a silvicultural harvest method designed to regenerate a stand to establish a new age class that is generally less than 40 acres in size. To be accurate, tree clearing within the FAA clearance zone should not be referred to as a clearcut.

### Second Field Stop - Emigrant Gap

Proposed Action - Preliminary prescription is focused on reducing density and enhancing structural features. Oak release skips and gaps and reducing the white fir in the stand composition will be included. Cable logging systems will be necessary in many of these stands. We are interested in whole-tree cable yarding, removal of sub-merch material, and alternatives to cable such as different approaches to operating equipment on steeper slopes without causing detrimental soil disturbance. Residual stocking will be approximately 100 square feet of basal area.

Looked at a mixed conifer stand holding over 200 square feet of basal area on slopes exceeding 35%. Estimated sawlog volume per acre would likely exceed 8,000-10,000 board feet. There is a road at the top of the slope but has no road at the bottom of the unit.

- These conditions could facilitate using winch assist to tether a modified feller buncher on steep slopes to cut and position trees on the slope for cable yarding to the upper road. Biomass material could also be cut and positioned for removal using this method. See attached Winch assist seminar that describes the process and effects on steep slopes.
- Include a Non-Significant Forest Plan Amendment, as part of the proposed action to allow mechanical equipment on steep slopes to complete needed treatments. The Tahoe Forest Plan has a 30% limit on ground based equipment. Include in the NEPA decision that this one-time treatment is needed to improve forest health and reduce fire risk. Analyze treatment alternatives that include standard cable yarding as a backup plan. Recognize, though, the limitation of skyline only. It's not going to be practical or economic to call for removal of all trees down to 3" DBH without a winch-assisted feller/buncher.
- The project area would be a good location for a small demonstration (<5 acres) to show equipment capabilities and effects. Resource specialists would be able to see the effects first hand. The project is near I-80, making it accessible for a contractor and resource specialist from the RO and adjacent Forests. Winch assist has the potential to treat several thousand acres of the steep slope backlog in the Region and "open up" about 25% of the productive forest land (slopes >30-35%) on the national forests.
- Design effective and economical projects that will pay their way out of the woods. Treat the backlog of overstocked stands on steep slopes. Timber sales with low volumes per acre and small diameters have high logging cost and may not be economical to harvest. In tractor units, an increase from 3-4 mbf per acre to at least 5 mbf per acre would make a difference in economic viability. Package steep slope units with economical tractor units to improve overall sale economics. Design timber sales with a ratio of 3:1 (3 acres of tractor ground for every 1 acre of steep ground). Many acres could become available for treatment by just allowing ground-based equipment (winch assist) to operate on up to 45-60% or greater slope including short pitches. On private land, winch assist has been effective on up to 80% side slope. Steeper slopes may still need helicopter or cable yarding systems after the cut material is bunched in a corridor by the winch-assisted feller buncher.

Annual Fall/Winter AFRC Monitoring Meeting - This year's meeting will focus on the combined program of work for the Tahoe Central Sierra Collaborative (Tahoe Basin, Tahoe, and Eldorado NFs). The meeting will be scheduled for November or early December.

Thank you for the opportunity to provide comments and recommendations on the design. and implementation of the Buckeye project. We are glad to see the Tahoe National Forest is proposing forest health projects that will reduce hazardous fuels and tree stocking density and will likely provide useful timber products to our membership.

Sincerely,

*/s/Scott Stawiarski*

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[American Forest Resource Council](#)

cc: AFRC, CFA, Tahoe FLT  
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