



November 8, 2018

Matthew Jedra, District Ranger
c/o Gretchen Jehle, Project Leader
Beckwourth Ranger District, Plumas National Forest
PO Box 7
Blairsden, CA 96103

In Reply To: Haskell Forest Health Project

Dear Matthew,

The American Forest Resource Council (AFRC) provides the following scoping comments on the Haskell Forest Health Project purpose and need and proposed action. 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 work to improve federal and state laws, regulations, policies and decisions regarding access to and management of public forest lands and protection of all forest lands.

AFRC represents over 50 forest product businesses and forest landowners throughout the West. Many of our members have their operations in communities adjacent to the Beckwourth Ranger District, and the management on these lands ultimately dictates not only the viability of their businesses, but also the economic health of the communities themselves. In the California forest sector, 8.5 direct and indirect jobs are created per million board feet (mmbf) of timber harvested. These numbers include stump-to-mill and sawmill jobs. Rural communities, such as the ones affected by this project, are particularly sensitive to the forest products sector in that most manufacturing jobs are in wood manufacturing. The forest products sector is one of the few sources of stable living-wage employment in these communities.

We are glad to see the Beckwourth Ranger District continues to propose forest health projects that will reduce hazardous fuels and tree stocking density and 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 Plumas National Forest for contributing to this supply.

AFRC support the Proposed Action because it improves forest health and fuels conditions using mechanical thinning on 2,016 acres. It reduces the risk of stand replacing wildfire which would help protect life and property including aquatic and cultural resources, recreation sites, and wildlife habitat.

The following comments are submitted in support of the proposed action and implementation of effective and economically efficient projects that will pay their way out of the woods.

1. Design Effective and Economically Efficient Thinning Projects

The Purpose and Need/Proposed Action identifies the locations and design criteria for treatments, but it doesn't identify forest types being treated, current and projected post treatment tree stocking density, or estimated average volume per acre. *Stand exams have been conducted throughout the project area and demonstrate high stand densities.* This site specific information is important to know to determine if potential timber projects are effective and economically viable.

Overly conservative thinning prescriptions resulting in low volume per acre would be less forest health effective and could contribute to no bid sales. AFRC supports silvicultural prescriptions based on one effective thinning entry every 20 years. Target stand densities following thinning should generally range down to at least 35 percent of maximum stand density index so that stand density would remain at or below 60 percent of maximum SDI for at least 20 years after thinning to minimize the need for re-entry. This would reduce the number of entries over time and provide added assurance against future drought. Heavier thinning would meet forest health objectives for a longer timeframe, create conditions more conducive to the establishment and growth of shade intolerant species, and provide sufficient value (saw timber) for economically efficient projects that can pay their way out of the woods. This approach has been widely used and was endorsed by former Regional Forester Jack Blackwell, "Conifer Forest Density Management for Multiple Objectives, 7/14/2004."

When considering thinning in areas with canopy restrictions (HRCAs), long term benefits to forest health and future habitat sustainability should be carefully weighed against any short-term reductions in canopy closure. Canopy closure will recover through increased growth of residual trees over time.

We support treating 35 to 45 percent slopes using ground based mechanical equipment depending on existing conditions (slope position, road location, etc.) and soil types.

2. Identify Water Drafting Sites on Project Maps

All water drafting sites and water sources should be analyzed and identified on project maps. We consistently ask for this when commenting on similar projects. The Forest Service sometimes

completes timber sale appraisals based on inadequate water sources. This has the potential to create problems including unforeseen costs for the purchaser. We recommend that adequate water source(s) that normally carry the minimum necessary flow for drafting to occur be identified during planning and before completing the appraisal and then appraise for use accordingly. This is important information to determine if potential timber projects are economically viable.

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

Sincerely,

/s/Scott Stawiarski

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cc: AFRC, CFA