



November 16, 2018

Carol Thornton, District Ranger
Eagle Lake Ranger District, Lassen National Forest
477-050 Eagle Lake Rd.
Susanville, CA 96130

In Reply To: Whaleback Fire Salvage Project

Dear Carol,

The American Forest Resource Council (AFRC) provides the following scoping comments on the proposed Whaleback 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. 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 Eagle Lake 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.

AFRC is glad to see the Eagle Lake 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 2,932 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) Maximize the use of commercial fire salvage where applicable to meet Goal 1, recover economic value of fire killed and damaged trees and Goal 3, remove fire-killed trees to reduce 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.

The Whaleback Purpose and Need and Proposed Action states,

- *Post-fire salvage management opportunities were generally focused in areas that experienced moderately high to very high vegetation burn severity effects...*
- *Overall, the majority of the area, 70 percent, experienced high to very high burn severity effects (greater than 75 percent basal area tree mortality).*
- *Snags would be retained in clumps ranging in size from 0.1 acre to 2 acres, representing the largest diameter snag classes in the unit. Snag retention would comprise approximately 5-10 percent of the salvage treatment units...*
- *The project has been designed to avoid sensitive and protected areas including archaeological sites, riparian habitat, and steep slopes. **Forty percent of moderate to high severity burned areas within the Whaleback Fire project area have been excluded from the treatment areas.***

Table 1 on page 3 shows that 12,799 acres burned at high to very high severity with a total of only 2,688 acres (21%) proposed for treatment. The remaining 79% is excluded from treatment. Does this meet the purpose and need to the maximum extent possible?

Please provide the specific reasons why 10,111 acres that burned at high to very high severity (greater than 75 percent basal area tree mortality) are not proposed for treatment.

- 2) Maximize reforestation to expedite restoration of forest cover following R5 Minimum and Recommended Stocking Requirements (*FSH 2409.26b Reforestation Handbook, 4.11a*). These requirements should be added to the Silviculture Design Features.

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

Sincerely,

/s/Scott Stawiarski

Scott Stawiarski
AFRC Consultant
Janesville, CA 96114
sstawiarski@amforest.org
[American Forest Resource Council](#)

cc: AFRC, CFA, Lassen FLT