



March 7, 2019

Lon Henderson, District Ranger  
Yuba River Ranger District, Tahoe National Forest  
15905 Hwy. 49  
Camptonville, CA 95922

**In Reply To:** Trapper Project

Dear Mr. Henderson,

The American Forest Resource Council (AFRC) provides the following scoping comments on the proposed Trapper 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 American River 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 Yuba 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 9,734 acres of commercial thinning utilizing mechanical, skyline, and helicopter yarding systems. In addition, the proposed action

includes 974 acres of reforestation, 5,331 acres of hand thinning, and mastication, and up to 12,800 acres of underburning and other related fuels treatments.

### **1. Maximize Acres Thinned for Forest Health Restoration**

We support thinning overstocked stands to improve forest health and fuels reduction wherever it is needed. This project proposes to commercially thin 51% of NFS lands in the project area. We appreciate the District's consideration of skyline and helicopter yarding systems to treat slopes greater than 30%. 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 timeframe, create conditions more conducive to the establishment and growth of shade intolerant species, and provide sufficient value (saw timber) to be economical.

Thin stands to stocking levels that will be forest health effective for 20 years. 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

### **3. Reduce Equipment Operating Restrictions on Slopes Greater than 30%**

**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 30% (where applicable).**

In conjunction with cable harvesting on steeper slopes, there are opportunities to use certain mechanical ground equipment such as feller bunchers and processors on slopes greater than 30% to make cable yarding more efficient and effective. Allowing the use of processors and feller bunchers where applicable can greatly increase economic viability, and in some cases, decrease disturbance by decreasing the amount of cable corridors, reduce damage to the residual stand and provide a more even distribution of woody debris following harvest. In addition, steep slope harvesting with tethered machinery is a promising new technology (see attached "Tethered Equipment on Steep Slopes: Soil-Machine Interaction").

### **4. Water Drafting Sites**

Thank you for identifying the location of approved water drafting sites on the project map. We also appreciate the inclusion of a proposed action item dealing with improvement of water sources: *Improving or constructing new water sources to reduce erosion into creeks by rocking approaches, creating off-channel sites. This would facilitate maintaining water*

*quality while also providing water sources that can be used during fire emergencies and for dust abatement along roads to maintain air quality.*

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

Attachment