



April 13, 2019

Lisa Spahr, District Ranger
Modoc National Forest, Warner Mountain Ranger District

In Reply To: Fandango Project

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

AFRC is glad to see the Warner Mountain 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 Modoc National Forest for contributing to this supply.

AFRC provides the following comments in support of the proposed action.

1) Maximize Acres Thinned for Forest Health Restoration

We support thinning overstocked stands to improve forest health and reduce hazardous fuels. Identify all acres needing treatment inside the project area. Complete a categorical exclusion (CE) if the total acres are below the acre limitation. Otherwise, complete an environmental assessment that includes all acres needing treatment. Don't limit proposed treatment acres to stay below the acre limits in a CE. 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. 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) Water Drafting Sites

Please identifying the location of approved water drafting sites on the project map. 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

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cc: AFRC, CFA, Modoc FLT