

# Central Sierra Environmental Resource Center

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April 30, 2018

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P.O. Box 500

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Cc: Ray Cablayan

RE: Arnold Avery Forest Restoration Project comments

Hi, Alaina and Ray:

We apologize that we are just now submitting these latest comments. Our staff has been intensely busy with competing time demands.

We visited a number of sites within the Arnold-Avery project area last week and spent hours assessing stand conditions, the varying volume per acre, tree mortality, proximity to residential areas (and areas not adjacent), fuel loading, habitat characteristics, influence of adjacent SPI managed areas, and other issues or points of consideration within the proposed CE area.

We understand that the District staff is actively assessing the project area and that proposed activities may change from the original acres or actions described in the scoping notice. However, the following points will still be pertinent. Here are supplemental comments to add to our previous input.

1) After having visited many portions of the project area, CSERC questions whether the merchantable volume of sawlogs (and biomass) to be removed will be sufficient for the project to be sold – or whether the District and Forest should instead expect this to be a project that will need appropriated dollars. Many of the relatively dry-site conifer stands are already moderately open without high numbers of medium size conifers competing for space or creating dense structure. Accordingly, CSERC staff notes that while a variety of ladder fuel treatments, surface fuel treatment (primarily prescribed fire), and mastication may be deemed to be appropriate to make the forest more fire resilient, none of those treatments will likely be able to be done if the District must rely on revenue from sawlogs within the project area to implement the other treatments.

Accordingly, we encourage the District to assess the true treatment needs of the project area. It appears that primarily there is a need for surface and ladder fuel reduction, along with some scattered or targeted sawlog thinning treatments of green conifers where economically viable, and also some targeted removal of commercially viable snags where possible. If those are the actual needs, then the District should spell out the estimated costs of those treatments and be clear that appropriated dollars will be needed for many of the actions to be implemented. If a suite of project actions is proposed and approved, but only sawlog and biomass removal portions of the project actually end up moving forward due to economic constraints, the District will be misleading those who are supporting the broader range of approved treatments.

2) Initially CSERC suggested avoiding any treatments in the PAC acres because with so many other acres in need of treatment outside the PACs, it seemed a better bang for the buck to work where trees larger than 12” dbh could be removed and where canopy cover limitations were not as restrictive. However, given that the District is likely to discover that a good percentage of the project area cannot economically be treated even with a chunk of appropriated dollars added in, it may now be that PAC acres are viable for some level of treatment. In particular, aggressive hand thinning of the understory thickets of incense cedars and white firs in some PAC areas could better ensure that a wildfire entering the project area would have less potential to flare up into the overstory larger trees. With the new understanding of the high value for spotted owls of trees 32> meters tall, hand treatments within PACs to bolster the resiliency of those taller tree stands could be valuable if done strategically.

3) CSERC notes the unclear wording in the scoping document about canopy cover in PACs after treatment. (*“Post-harvest canopy cover would be greater than 40% in PACs*.”). That appears to allow PAC canopy cover to be dropped to 41% or higher. Until new scientific studies clarify the minimum canopy cover that is generally needed or favored by CA spotted owls, CSERC urges that treatments in PACs do not drop the canopy cover any lower than 50%, and that most PACs be managed for 60% canopy cover or higher.

4). After visiting both the lower Interface area and the upper Interface portion of the project area, it is unclear why so many patches or scattered groupings of dead pines (including behind the fuel break that runs from near Avery up behind Lakemont Pines) are not being targeted for removal. We agree that most are not currently sawlog value trees, but the amount of fuel they will add to the forest floor when they rot and fall will be substantial. We encourage both in that fuelbreak area and in the upper Interface commercial thinning treatment areas west and northwest of White Pines Lake that as many of the dead trees as possible be removed as long as the retention standards of snags per acre are still retained.

5) CSERC supports the mastication treatments proposed for the Old Gulch plantation areas at the south end of the project area. Fuel treatments there can only benefit upslope residential properties.

6) Similar to the intent of GTR-220, we urge that the currently dense, shady conditions down in the drainage and low slopes along San Antonio Creek be only minimally entered (primarily for small to mid-size thinning and very limited 24” dbh or larger sawlog tree removal), in order to retain that shadier, denser habitat in the moist, cool drainage and lower slope areas where fire risk is lowest. However, where oaks or riparian hardwoods have opportunity to benefit, selectively removing medium large size cedars and white firs up to 24” dbh in that stretch of deeper shade riparian or cool site habitat may have benefits.

7) We are puzzled by the apparent location of a fuel break in the general vicinity of 5N52 and 5N34 that appears to overlap with core areas of PACs and HRCAs. Any further opening up of CA spotted owl habitat to the level desired for a shaded fuelbreak is likely to be negative for the owls. If fire and fuels staff believe that there is no parallel area alternatives suitable for an effective fuelbreak, CSERC recommends a middle ground balance that would result in shaded fuel break habitat within the HRCA and PACs acres being managed to retain a higher percentage than normal of shaded, denser forest habitat, small trees, etc.

Overall, our recent field visit to the site reaffirms that there is a huge amount of surface and ladder fuel that it would be beneficial to remove within the commercial thinning units and especially within the tree mortality areas of the project site. Unless broadly applied fuel reduction treatments are done at a scale that actually results in a significant reduction in fuel and gaps in fuel arrangement, the risk of a wind-whipped fire blowing through the upper Interface area into developed areas will be a significant threat.

Thank you for considering these still-early comments.

John Buckley, Heidi Beswick, and Liz Gregg

CSERC