

# ACCG Project Development & Support Process Forest Treatment Guidance Document

## Comment Tracker Summary

**[WORKING DRAFT]**

Updated April 17, 2020

### Introduction

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In 2019, the ACCG began working diligently to advance an [ACCG Project Development and Support Process](#) that addresses the urgency for meaningful forest management on the landscape in a way that aligns with the ACCG's triple bottom line for the environment, community, and economy. At the February 19, 2020 ACCG General Meeting, the ACCG agreed to implement the Project Development and Support Process in its draft form while conversations continue to refine components, including the [Proposed Forest Treatments Guidance \(version 2/5/20\)](#) document.

### Document Purpose

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The purpose of this summary document is to capture major themes from ACCG members' comments on the Proposed Forest Treatments Guidance Document and track how comments have been incorporated into the guidance document over time.

### Overview of Topics and Overarching themes

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#### ***Recurring topics from ACCG comments:***

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| A. <a href="#">ACCG Strategies / Approach</a>                         | G. <a href="#">Legacy Trees</a>                        |
| B. <a href="#">Process / Procedures</a>                               | H. <a href="#">Management Approaches</a>               |
| C. <a href="#">Guidance Document Scope / Language</a>                 | I. <a href="#">Herbicides</a>                          |
| D. <a href="#">Infrastructure</a> (e.g., Facilities / Roads / Trails) | J. <a href="#">Prescribed Burning</a>                  |
| E. <a href="#">Habitat / Protected Areas</a>                          | K. <a href="#">Fuel Breaks</a>                         |
| F. <a href="#">Restoration / Reforestation</a>                        | L. <a href="#">Plantations</a>                         |
|   | M. <a href="#">Salvage Logging and Hazardous Trees</a> |

#### ***Overarching Themes***

(Listed in no particular order):

- General support for ACCG strategic goals and principles (e.g., getting more work done on the ground, increasing pace and scale, etc.).
- General support for the intent of the forest treatments guidance document tool (e.g., more specifically describing what are broadly supported (i.e., non-controversial) treatment activities.
- Concern the engagement process associated with the guidance document will overly delay project development and implementation. Conversely, there are also concerns about rushing in creating an expedited project development process.
- Concern the guidelines will deter project proponents from either engaging ACCG (as the process seems too cumbersome) or incorporating aggressive but crucial treatments (impeding our ability to increase pace and scale).

- Doubt that some of the guidelines are appropriate to inform treatment decisions (e.g., dbh limits under certain considerations or single-species driven management). Strong call for science- or evidence-based management decisions.
- Concern the guidance document does not adequately address socio-economic considerations. The overall Project Development and Support Process should support the ACCG's triple bottom line values (Note: As of April 2020, several edits have been incorporated to encourage project proponents to consider socio-economic issues, and an ad hoc group is working on ensuring socio-economic considerations and guidance are sufficiently prominent in the Project Development and Support Process).

## Summary of Comments and Next Steps

### A. ACCG Strategies / Approach

#### *Intents and Purposes*

##### *Sharing Information*

A commenter (Dec 2019) stated he was fine with the ACCG focusing on serving as an information-sharing forum. ACCG excels and sharing information between individual member organizations and with expert speakers.

Outcome: ACCG will continue to foster information-sharing and learning/understanding as a major component for building the ACCG's capacity and sustainability as a collaborative body.

##### *Leaders Changing the Landscape*

A commenter (Nov 2019) observed that, despite seemingly opposing interests and perspectives in diverse stakeholder groups, collaboratives are fully capable of breaking through impasses to find common ground and be proactive participants in management processes (cited example when YSS offered an alternative to MOTOR M2K). He urged the ACCG to seize this opportunity as leaders creating meaningful change in forest management for the Amador-Calaveras landscape. This will require stepping outside our comfort zone and our experience base and do something dramatically different if we are going to make a serious difference.

Outcome: Implementing the Strategic Plan and Engagement Strategy, which includes refining ACCG governance, consensus-building trainings, professional facilitation, the Project Development and Support Process, etc. – creating a strategic and deliberative pathway to help the ACCG enhance its collaborative capacity, build on successes, and advance its goals. It's helpful to remember the progress of the ACCG and urgent need to keep pressing on.

#### *Efficiency / Effectiveness*

Several commenters conveyed the tool is beneficial in principle (e.g., clarifying the criteria for low-controversial activities for projects proponents). However, commenters identified several issues to resolve before they felt the tool could successfully advance the ACCG's work.

Outcome: Comments in this tracker document intended to capture these concerns and document how those issues were addressed.

### *Pace and Scale*

Several commenters underscored a sense of urgency to substantially increase pace and scale for forest treatments (“If we do not aggressively go after our overgrown forests so that we get them in a fire resilient drought resistant condition, we will simply lose them in time to wildfire and disease.”). ACCG must address barriers for increasing pace and scale (e.g., lack of funding and facilitating NEPA processes).

Another commenter (Feb 2020) was unsure if everyone around the table agrees there is urgency to increasing the pace and scale of forest management activities to protect local communities from catastrophic wildfire.

Outcome: Several efforts currently underway to address this concern, including a yet-to-be-formed Funding Coordination Work Group.

## **B. Process / Procedures**

### ***Efficiency / Effectiveness***

#### *Engagement Seeking Endorsement (Timelines, Level of Effort, Costs)*

Multiple commenters shared concerns the engagement process associated with the guidance document will overly delay project development and implementation.

Concern the guidelines will deter project proponents from either engaging ACCG (as the process seems too cumbersome) or incorporating aggressive but crucial treatments (impeding our ability to increase pace and scale). One commenter suggested that the Guidance Document adds another environmental review that is duplicative to CEQA and NEPA.

Outcome:

#### *Addressing Major Barriers to Success*

A commenter (Dec 2019) cautioned against finalizing the Project Development and Support Process components before addressing five major barriers (i.e., satisfy ACCG’s goals for the economy, getting more work on the ground, increasing pace and scale, considering climate change impacts, and streamlining already widely supported projects).

Outcome: Several efforts currently underway to address these barriers, including the Socio-Economic Ad Hoc Group and SLAWG.

#### *Streamlining if Stakeholder Engagement Already Embedded*

Several commenters suggested that projects/grants developed by Fire Safe Councils, Resource Conservation Districts and other non-profits to protect communities from catastrophic wildfire already have stakeholder support and accountability built into them (e.g., Community Wildfire Protection Plans). These should fall into Category I to encourage grant writers to actively seek ACCG endorsement AND signal that ACCG is indeed an "All Lands" org and vigilant to social/economic dynamics of sustainability. These projects/grants address each of the three pillars of sustainability.

Outcome:

### **Decision-Making / Approvals**

Multiple comments questioning what level of ACCG review and approval is warranted through this project review process.

Outcome:

## **C. Guidance Document Scope / Language**

### *Document Tone*

A commenter (Nov 2019) reflected that the tool seems to be a general statement of concerns rather than a set of project activities that need to be managed. The document conveys a negative tone as it appears to just list things we can't do rather than what we can.

Another commenter (Feb 2020) suggested changing the category titles from the word controversial to something else-- (levels of consideration, deliberation or discussion, for example)

Outcome: Planning WG working on edits to accurately convey the purpose of this document is meant to assist project proponents rather than deter.

### *Vision*

Commenter (Nov 2019) suggested that rather than focusing on perfecting these treatment guidelines (because there will never be enough information to be 100% confident in management decisions), the ACCG should choose an ideal vision for the structure/ characteristics of the forest (that is ambitious to substantially increase pace and scale) and actively pursue a management strategy to achieve that aim. The commenter offered several suggestions (age diverse, species diverse, fire resilient, drought resilient, forest where all species have the opportunity to thrive; 100 years ago generally represent good conditions [refer to original comment for more specifics, lines 280-295]).

Outcome:

### *Category 1: Non-Controversial Activities/Considerations/Procedures*

Commenter (Nov 2019) questioned the necessity for this category as it appears to create process steps with limited added value and at the risk of delaying project development and implementation.

Outcome:

### *Considerations Column*

Commenter (Nov 2019) felt that the information in the "considerations" column doesn't necessarily add value to the document because are "common sense"

Outcome:

### *Climate Change*

Commenter (Dec 2019) said the tool does not adequately incorporate climate change considerations, particularly the increasing risk of mega fires and drought mortality.

Outcome:

#### *Pace and Scale*

Several commenters conveyed strong concerns the tool does not appear to satisfy the ACCG strategic goal of getting more work done on the ground or foster a path for substantially increasing pace and scale. A commenter stated the tool appeared to scale work back as opposed to scaling up.

Outcome: Several efforts currently underway to address these barriers.

#### *Highly USFS-Focused*

Multiple commenters (Nov and Dec 2019) observed the document content appeared to be heavily focused on guiding public agencies' treatment decisions (particularly USFS and BLM). One of the commenters elaborated this was not necessarily a critique, but observed this USFS-focus has been a historic pattern for the ACCG [Side note: the ACCG Strategic Plan set an objective for the ACCG to promote work and partnerships outside of USFS to realize all-lands resilience and sustainability]. The same commenter said he was fine if the ACCG focused exclusively on USFS land management activities (because USFS Region 5 has a mandate to work with collaborative groups in land management; there is not an equivalent mandate from the private sector or other public agencies).

Another commenter (Feb 2020) suggested revising the language to include terminology used outside of National Forest lands.

Outcome:

#### *Balanced Stakeholder Perspectives*

Commenter (Nov 2019) indicated the content did not appear to represent balanced perspectives (i.e., lacks sufficient input from industry or project proponents).

Outcome:

#### *Socio-Economic Considerations*

Multiple comments (Dec 2019) stated the draft guidance document was highly environmental-focused with little components related to the other pillars of ACCG's triple bottom line (community and economy). A commenter in Feb 2020 offered minor edits aimed to incorporate socio-economic and economic values into the forest treatment guidance documents.

Outcome: Socio-Economic Ad Hoc Group (subset of Planning WG) also began meeting in February 2020 to discuss how to ensure socio-economic issues are sufficiently considered during project development.

## D. Infrastructure (e.g., Facilities / Roads / Trails)

### Category 1: Non-Controversial

*Four activities: 1) Re-routing roads and trails around meadows; 2) Road and drainage maintenance and repairs...; 3) Maintenance and minor improvements to existing developed facilities; and 4) Road reconstruction*

Commenter (Nov 2019) agreed that these were non-controversial, but was confused as to why there is a need to call out non-controversial activities and subject them to the ACCG's review and approval process. He believed these guidelines are overly prescriptive and add too much time /delay to project implementation with limited added value for treatment outcomes. He suggested these standard / routine activities that benefit the public should receive automatic approval.

Outcome:

*Road decommissioning*

Commenter (Nov 2019) suggested this activity could potentially be controversial because there is a need to retain all existing roads in the foreseeable future for vegetation management, firefighting, public access, etc.

Outcome:

### Category 3: Controversial

*Two activities: 1) Permanent new road construction (adding new miles to the road system); and 2) Tree cutting and removal in inventoried roadless areas.*

Commenter (Nov 2019) indicated these are important activities to create a resilient forest against wildfire (need roads to access areas of the forest for treatments). The commenter also wondered if temporary roads or reinstating decommissioned roads would be less controversial.

Outcome:

## E. Habitat / Protected Areas

### Category 1: Non-Controversial

*Two activities: 1) Meadow restoration that does not include removal of legacy trees; and 2) Removing conifers less than 16-20" dbh outside of PACs and den buffers.*

Commenter (Nov 2019) conveyed concerns that including these activities in the list gives a sense of being overly prescriptive. These activities should be automatically approved.

Outcome:

### Category 2: Moderately Controversial

*Two activities: 1) Logging trees 16-20" dbh in key habitat areas like PACs and den buffers; and 2) Logging trees 20-30" dbh especially in HCRAs and fisher den buffers*

A commenter (Nov 2019) expressed doubts that research supports using these dbh guidelines to make treatment decisions ("Current science says our PACS are too large by more than an order of magnitude, almost two orders of magnitude. You need to establish why these diameters are critical and why they override the need for fire resilience and drought / disease resistance."). He shared concerns these dbh guidelines are overly prescriptive and may inadvertently lead to overly dense key habitat areas that will be completely taken over by a wildlife. Another commenter (Feb 2020) suggested deleting the word "especially" so that it's clear that logging trees 20" to 30" dbh outside of HRCAs and fisher den buffers is not shown as something to be viewed as moderately controversial (it's fully consistent with current USFS, BLM, and CAL FIRE policies).

Outcome:

### Category 3: Controversial

*Three activities: 1) Logging trees 20" dbh or greater in Owl PACs; 2) Logging trees 30" dbh or greater for "Forest Health" (e.g., red fir dwarf mistletoe, etc.); and 3) Reducing canopy cover in high quality spotted owl habitat to lower canopy cover class.*

Similar concerns as described in the Category 2 Habitat / Protect Areas issues: The commenter (Nov 2019) shared doubts that research supports using these dbh guidelines to make treatment decisions and concerns these dbh guidelines are overly prescriptive and may inadvertently lead to overly dense key habitat areas that will be completely taken over by a wildlife. He referenced Ackerson Meadows studies with Great Grey Owls

Outcome:

## F. Restoration / Reforestation

### Category 1: Non-Controversial

*Aspen Restoration that includes logging trees less than 30" dbh*

Commenter (Nov 2019) conveyed concerns these dbh guidelines seem to be overly prescriptive and adds time /delay to project implementation with limited added value for treatment outcomes. He suggested this activity should be receive automatic approval.

Outcome:

## Category 2: Moderately Controversial

*Aspen restoration that includes logging trees greater than 30" dbh (even if legacy trees are maintained)*

Commenter (Nov 2019) stated that, "aspens are more important than 'legacy trees' and 30" dbh trees. This has to be a compromise where we are trying to retain Aspen stands."

Outcome:

*Reforestation projects*

Commenter (Nov 2019) felt that reforestation projects would not be controversial enough to warrant going through the Category 2 process.

Outcome:

## Category 3: Controversial

*Aspen restoration that includes logging legacy trees.*

Commenter (Nov 2019) was unclear about the rationale or desired result from this guideline. He suggested a broader strategy to identify and prioritize the appropriate restoration approach (e.g., through the process and look at restoring our forests to what they looked like say 100 years ago where we have that data).

Outcome:

## G. Legacy Trees

### Category 1: Non-Controversial

*Column 2: Considerations: Legacy trees generally refer to trees that pre-date modern fire suppression practices.*

Commenter (Nov 2019) recommended a different definition for "legacy trees" or usage. Instead, he suggested managing for "trees of interest" to be more conscious and strategic about tree thinning. He shared concerns that preserving "legacy trees" may eliminate creating age diverse, species diverse forest.

Outcome:

## H. Management Approaches

Multiple comments (Nov and Dec 2019) expressed doubts that diameter limits or single issues or species-focused guidelines are appropriate to inform treatment decisions. Strong call for science- or evidence-based management decisions.



### *Diameter Limits*

Multiple comments (Nov and Dec 2019) stated that using diameters limits often led to undesired conditions (e.g., lower age/species diversity) and appears to be antithesis to science-based forest management.

Outcome:

### *Systems-Focused Rather than a Single Issue or Species*

Commenter (Nov 2019) described drawbacks for management focused on single issues or single species. He said historically this single issue/species approach often led to virtually no active management, and often at the expense of other species in the forest. He encouraged adopting a systems approach instead.

Outcome:

## **I. Herbicides**

### **Category 1: Non-Controversial**

#### *Herbicide use to treat non-native plants as a temporary treatment*

Commenter (Nov 2019) saw this guideline as overly prescriptive and would add too much time /delay to project implementation with limited added value for treatment outcomes. He suggested these standard / routine activities should receive automatic approval.

Outcome:

### **Category 2: Moderately Controversial**

#### *Herbicide use near water sources and other sensitive habitats or species.*

Commenter (Nov 2019) questioned whether the habitat or the sensitive species would do better with the proposed treatment or wildland fire. That being said prudence is always an issue. Does ACCG have any expertise in this area to advise appropriate decision making? What constitutes “near”?

Outcome:

#### *Herbicide use for creating or maintaining large fuel breaks*

Commenter (Nov 2019) saw this guideline as overly prescriptive and would add too much time /delay to project implementation with limited added value for treatment outcomes. He suggested these standard / routine activities that benefit the public (i.e., fuel breaks) should receive automatic approval. He also suggested setting rules for herbicide use including acceptable products for use.

Outcome:

### Category 3: Controversial

*Two activities: 1) Herbicide use for plantation establishment; and 2) Herbicide use for creating or maintaining large fuel breaks over the long term*

Commenter (Nov 2019) saw these guidelines as overly prescriptive and would add too much time /delay to project implementation with limited added value for treatment outcomes. He said treatments must be cost-effective to restore our forests; herbicides offer some opportunity (and obviously used safely and properly). He suggested defining the rules that make sense for use of herbicides, where when and concerns. Define what we expect and need.

Outcome:

## J. Prescribed Burning

### Category 1: Non-Controversial

*Prescribed fire with agency approved burn plan*

Commenter (Nov 2019) is unclear if ACCG wants approval authority or just wants to be informed.

Outcome:

## K. Fuel Breaks

### Category 1: Non-Controversial

*Column 1: Project Activities – Thinning of fuel breaks*

Commenter (Feb 2020) suggested adding “Thinning of fuel breaks” to help clarify that thinning logging to create or maintain fuel breaks is not controversial.

Outcome:

## L. Plantations

### Category 2: Moderately Controversial

*Commercial or non-commercial thinning in plantations*

Commenter (Nov 2019) disagreed that this activity could be controversial enough to warrant going through the Category 2 tool process. The commenter speculated that guidelines similar to these might be indicative of certain stakeholders’ distrust in USFS.

Outcome:

## M. Salvage Logging and Hazardous Trees

### Category 1: Non-Controversial

*Hazard tree (trees that impact public health and safety) removal...*

Commenter (Nov 2019) warned about potential public upset if hazardous tree removal were delayed due to the ACCG review/approval process. Public safety actions should receive automatic approval.

Outcome:

### Category 2: Moderately Controversial

*Salvage logging along roadsides, in strategic fuel breaks, and/or to protect property*

A commenter (Nov 2019) indicated salvage logging in these areas (removing potentially hazardous trees) would not be controversial enough to warrant going through the Category 2 process.

Another commenter (Feb 2020) suggested moving to Category 1: Non-Controversial because the activity protect public safety, supports fire management, and generates economic benefits.

Outcome:

### Category 3: Controversial

*Salvage logging outside of roadsides and fuel breaks especially where sensitive wildlife habitat may be affected*

Commenter (Nov 2019) expressed concern that this guideline would deter salvage logging in sensitive habitat areas, and become a missed opportunity to actually realize potential benefits to wildlife (e.g., prevent the hazardous trees disrupting migratory habits or restrict travel by some juvenile species).

Outcome: