



Sustainable Forest Action Coalition

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**Participating
Representation from
the following:**

April 18, 2014

Timothy E. Davis, Acting District Ranger
Devil's Garden/Warner Mtn RD

CALIFORNIA

Amador
Butte

Calaveras

Del Norte

El Dorado

Glenn

Inyo

Lassen

Modoc

Nevada

Placer

Plumas

Sacramento

Shasta

Siskiyou

Sierra

Tehama

Trinity

Tuolumne

Yuba

OREGON

Coos

Curry

Douglas

Jackson

Klamath

Josephine

Lake

NEVADA

Nye

RE: Lassen Project

On behalf of the Sustainable Forest Action Coalition, I am offering the following comments on the proposed Lassen project. These comments will be in addition to those that I have provided on October 7, 2009 and October 10, 2007.

The Sustainable Forest Action Coalition would like to offer the following comments on the Lassen project in addition to the comments that we submitted and dates provided above (please let me know if I need to resend those comments). Specific comment will be provided on the following issues;

- Social and Economic Analysis

Social and Economic Analysis

The Lassen project should provide a Purpose and Need statement in relation to Social and Economics (S/E). As discussed below, S/E is an element of most Forest Service NEPA documents that has been generally overlooked or deficient in content to truly be analyzed along with the environmental elements that are discussed in detail in all NEPA decisions.

If you look at Forest Service Manual, section 1920 Land Management Planning, there is a very important section that often plays second fiddle to all the resource issues on any given project and within the Land Management Plan. In most instances, there is only a fleeting reference to any specific social and economic discussion or analysis within the document. When you consider that there are hundreds of pages of information on environmental issues, it is no wonder that our counties and communities do not fair well with Forest Service projects. The specifics that I would like to discuss relate to;

1921.72 – Social and Economic Sustainability

The overall goal related to social and economic elements of sustainability is to contribute to sustaining social and economic systems that are affected by Forest Service management within the plan area (36 CFR 219.10(a)). For effective evaluation, the Responsible Official should identify and understand the social and economic systems related to the plan area.

1921.72a – Addressing Social and Economic Sustainability in Plans

The Responsible Official should collaboratively develop plan components to gain broad and diverse perspectives about sustaining social and economic systems in the plan area (see FSM 1921.6). In addressing contributions to sustaining social and economic systems in the plan, the Responsible Official should:

1. Establish desired conditions that contribute to sustaining social and economic systems using an interdisciplinary and collaborative approach;
2. Establish plan objectives, such as important roles and contributions the Forest Service can play, to achieve or maintain desired conditions; and
3. Establish performance measures to evaluate progress in achieving desired conditions.

1921.72b – Evaluating Contributions to Social and Economic Sustainability

In evaluating contributions to sustaining social and economic systems, the Responsible Official should:

1. For economic systems, consider the changing conditions and trends that affect relevant economic indicators such as employment, income, capital, housing, and fiscal health for important economic units such as individuals, households, industries, communities, regions, state and local governments, tribes, and the nation.
2. For social systems, consider the changing conditions and trends that affect relevant social indicators such as health, safety, and quality of lifestyle for important social units such as individuals, families, communities and the nation.
3. Consider how plan components contribute to sustaining social and economic systems.
4. Consider the performance of the plan components in achieving desired conditions for sustaining social and economic systems.
5. Periodically determine whether the plan components, especially the desired conditions, for contributing to sustainable social and economic systems remain valid.
6. Determine whether the evaluations indicate the need for change in the plan.

Given the fact that most geographic locations in Northeastern California have lost all of their capacity to economically treat products produced from Forest Service projects, it could be time that you address the issue that this social and economic impact is having on your ability to accomplish your projects. In addition, what these losses mean to the communities that you serve.

Just a few topics that need to be addressed to make a complete informed decision on this and future NEPA documents in relation to forest health projects would be;

- A Impact of reduced forest management and the effects on rural counties and communities;
- A The loss of forest products infrastructure, both mills and biomass facilities, and how that loss affects the ability to economically accomplish your projects
- A What does each forest health project mean to the local workforce as far as number of jobs supported or created over current standards?
- A Discuss the relationship between wages and benefits for mill/co-generation and woods workers to that of jobs related to recreation and tourism.
- A Discuss not only the jobs created directly to forest and forest infrastructure, but also the indirect jobs that such job sustainability means to the communities.
- A Discuss the Secure Rural Schools Act, its social and economic benefits to the counties and communities. What has that meant in relation to the previous National Forest Fund (NFF) deposits and receipts before and after the decline in the timber supply from the Modoc National Forest. What is the declining scale and the impact in relation to the current President's budget and the proposal to go to zero in five years.
- A Discuss the impact if you plan on using Stewardship contracts to accomplish the projects and the fact that there is not legal provision under that legislation to collect revenue generated from those contracts back into NFF.

A quick discussion of how the current social and economic situation that surrounded the most recent mill closures within the geographic area of consideration is worth discussing for your consideration of providing a complete Social and Economic Analysis within the Lassen project document. Overall reduced target and the fact that for the last several years the Modoc has applied a 20 inch diameter limit on all sales, the economic impact on individual sales as well as the program as a whole has been substantial. These arbitrary limits as well as the high percentage of biomass that has been included in projects have led to an increase in no bid sales which leads to additional losses of volume that will translate into prolonged mill closures. The impact of the loss of the direct jobs causes the further loss of indirect and induced jobs (1.6 – 2.25 according to IMPLAN documentation in the Framework EIS). When the mills closed, the loss of indirect and induced jobs is now also starting to occur and being felt in the rural economies.

Recent mill closures heightened the concern and need to address the issues surrounding the economic and social impacts when these closures occur. It is not only these immediate direct job losses, but the additional 1.6-2.25 associated indirect and induced jobs for every 1 direct job within our business communities that causes dramatic

loss in local community stability. This recent loss of our remaining forest products infrastructure is the latest round of closures that have occurred in our counties since 1989.

This loss of infrastructure makes it even more difficult to accomplish needed vegetation treatments that are vital to our watershed health as well as reducing the ever-increasing threat of large wildfire. Recently the state has endured some of the worst fire seasons in recorded history. The 2003 fire season set a new record in acres burned, which was to be broken only four years later in 2007. Furthermore, a new 75-year *national* record was set by the 2006 fire season. During the summer of 2008, while most of Northern California was enveloped in a smoke cloud from mid-June to the beginning of August, the Northern Sierras were experiencing the largest fires in their history. In 2009, the North State lost approximately 500,000 acres to wildfire. Since 2009, the Region has seen larger fires such as the Barry Point, Chips, Reading, Rim, American and Aspen. In addition to the direct threat to public health and safety; those fires also degraded the watersheds that are the prime source of California’s water supply.

When discussing losing the existing forest products infrastructure, it is important to consider what these jobs mean to our rural economic and social well-being. Forest workers and the related jobs that this infrastructure provide are all family wage jobs that provide health and insurance benefits. We encourage you to consider how to increase the needed acres treated to restore, enhance and stabilize our county’s natural resources and forest products infrastructure. With the emphasis on job creation, nationally, the following information should be used to highlight the importance of this effort to revitalize and maintain this economic opportunity.

The harvest and forest health treatments on National Forests within our Counties had an annual harvest that has been reduced to approximately one sixth of our historical levels of the late 1980’s and early 1990’s. When looking at forest related jobs and economics, 1 million board feet of harvest equates to 11.4 new direct and indirect jobs with an average annual wage of \$43,200 per job. We are sure this is low for California, but those statistics were from Oregon Department of Forestry. Also statistics from the US Agriculture Department showed that for every \$1 million invested in forestry projects 39.7 jobs were created.

If there is a concern that projects are over-cutting our National Forest and causing environmental harm by removing small and intermediate trees, then you should consider the information provided by the Forest Service, Region 5, in their 2009 Westcore Tables. The following table provides a statistical fact that within the Sierra Nevada’s; our National Forests are becoming an even larger threat to our rural counties from catastrophic wildfire as a result of an ever increasing inventory of overstocked forests.

Table 1. National Forest Growth, Mortality and Percentage of Growth Sold in 2009

FOREST	Productive Forestland (Acres)	Annual Net Growth (mmbf)	Av Annual Mortality (mmbf)	Mortality as % of net growth	2009 Vol Sold (mmbf)	As % of net growth
Modoc	570,754	84.4	40.0	42%	32.13	38.1%
Lassen	860,680	266.2	105.5	36%	69.4	26.1%
Plumas	988,969	1,134	66.5	6%	33.77	3%
Tahoe	669,910	535.1	41.7	8%	28.74	5.4%
El Dorado	393,498	198.2	50.1	26%	26.02	13.1%
Stanislaus	385,691	181.9	41.9	23%	29.86	16.4%
TOTAL	3,869,502	2,399.8	345.7	14.4%	219.92	9.2%

What have our rural forested counties lost as far as forest products infrastructure over the last 10-20 years? The following table will outline this loss over the last 20 years by county.

**Table 2. Mill Closure from 1989-2009
And Mills Open by County in 2010**

COUNTY	MILLS CLOSED 1989-1999	MILLS CLOSED 2000-2009	MILLS REMAINING
Amador	2	0	1
Butte	1	0	1
Calaveras	1	0	0
El Dorado	2	2	0
Lassen	2	2	0
Modoc	4	0	0
Nevada	1	0	0
Placer	2	0	2
Plumas	2	(small log mill)*	2
Shasta	10	3	6
Sierra	0	1	0
Siskiyou	4	1	3
Tehama	5	0	0
Tuolumne	1	1	1
Yuba	3	1	0
TOTAL	40	12	16

*SPI Quincy closed their small log mill in 2009 which is a part of the combination of small and large log facility. SPI has recently stated they plan to reopen the small log mill with two shifts of operation but are curtailing one shift in the large log mill.

After reviewing Table 2, it becomes very apparent that our rural forested counties cannot continue to lose this valuable forest products infrastructure if the U.S. Forest Service in California is to accomplish the restoration that is so critically needed. Many of these counties continue to suffer with extremely high unemployment rates and have not seen other businesses come in to replace their lost forest products infrastructure.

We have reviewed the report that the Forest Service is discussing, GTR 220, as the future reference for accomplishing this needed restoration work in the Sierra Nevada's and Northern Cascades. We do not find any discussion that would alter the current 30 inch diameter at breast height maximum tree size, impact any sensitive wildlife species, degrade our watersheds or in general cause irreparable harm to our counties National Forests. Again, our greatest concern is over the lack of concern on how GTR 220 and other Forest Service direction affect the social and economic wellbeing of our counties. GTR 220 and a follow-up addendum to the report pass off the social and economic issues tied to all of the environmental issues that are the center of the Framework case.

GTR 220 only provides a passing comment about socioeconomics. Within the section of the report on “Managing the Intermediate Size Class”, page 24, the following statement is made;

There may be socioeconomic purposes for harvesting intermediate-sized trees such as generating revenue to help pay for fuel treatment or providing merchantable wood for local sawmills.

This single statement within the document that you and others wish to use for future guidance only supports the Ninth Circuit Courts earlier decision and statements. As I recall, Judge Noonan stated that the Forest Service is biased when preparing their NEPA documents by their need to use the timber revenue to accomplish their work. That issue alone is delaying future projects and costing your organization precious dollars in the preparation of an additional NEPA alternative.

If this report displayed the true concern that your research scientist as well as your staff should take into account, the following issues and concerns are tied to environmental issues and socioeconomics. Just a few of the impacts that are not analyzed and not stated in GTR 220, as well as most NEPA documents, involve community health, job stability, impacts to schools and hospital and a discussion of the actual potential for jobs lost as well as the 1.6-2.25 associated indirect and induced jobs for every 1 direct job. We strongly encourage your agency and its employees to provide as much analysis of these socioeconomic considerations as they do with the environmental issues. If they did, maybe we would see entirely different public and employee considerations in your decisions and provide the courts a much fuller understanding of all of the environmental impacts that are continually debated by the litigants.

Currently the Sierra Nevada Conservancy, Forest Service leadership and others are advocating that recreation; tourism and niche markets related to forest products will come into areas that have lost their forest products infrastructure. They assume our communities will rebound by the increase in these supposed new economic drivers. All too often this has not been the economic replacement for the loss of forest products infrastructure and the result is a depressed community such as Adin and Greenville in Plumas County and Hayfork in Trinity County.

The following information and guidance comes from PNW-GTR-788, Values, Beliefs, and Attitudes Technical Guide for Forest Service Land and Resource Management, Planning, and Decision-making.

Social impacts are defined as:

The consequences to human populations of any public or private actions that alter the ways in which people live, work, play, relate to one another, organize to meet their needs and generally cope as members of society. The term also includes cultural impacts involving changes to the norms, values, and beliefs that guide and rationalize their cognition of themselves and their society [Interorganizational Committee on Principles and Guidelines 2003].

In our context, social impact assessment (SIA) is the identification, analysis, and presentation of the social impacts associated with Forest Service actions, as described in an environmental assessment (EA) or an EIS. Social impact assessment is a method of gauging the social consequences of alternative management actions or policies. The purpose and logic of the SIA is the same as for other elements of environmental impact analysis and assessments:

- To determine (social) conditions in areas or (human) populations likely to be affected by the action or

policy (if a social assessment exists, it provides this type of information).

- To project future (social) effects of continuing the status quo.
- To estimate social effects that will result at local, regional, and national scales if the management alternative is implemented.

The Sustainable Forest Action Coalition has been working with the Regional Office to better address S/E issues and provide avenues for Counties to assist in providing information to NEPA projects. As a result of these meetings, we have developed and continue to work on the following items.

- Developing a matrix that will display the key statistical indicators to be used as a check list for planners as they work on projects. The hope is these same indicators can be used to provide more complete input and analysis of individual Forest Plans as the Region moves through the current Forest Planning process. The statistical indicator areas being developed are:
 1. Social Capacity
 2. Civic Capacity
 3. Infrastructure Capacity
 4. Cultural Capacity
 5. Economic Capacity

In addition to these indicators, projects will analyze the individual outputs (i.e. AUM, Volume, etc) that will benefit or impact.

- We discussed Chapter 5, Socioeconomic Dimensions of Restoration, from the R5 Ecological Restoration Implementation Plan. This document was developed as a result of the Regional Foresters Leadership Intent letter of May 2010 that indicated the Regions desire and need to increase the pace and scale of ecological restoration within Region 5. This document and Chapter are being used as the guide for individual Forests to develop their Ecological Restoration Implementation Plan.
- The group agreed on the following items that we can begin working on at the Forest and County level to begin this process.
 1. At the beginning of a project, the Forest or District will coordinate with the County to determine the individual projects Area Of Influence and establish indices's to measure progress toward a desired future condition of healthy rural economies and communities in our Forest Counties.
 2. Continue to develop the Indicator check list. This list needs to be scalable and Warren will do a review of existing data that is available. Mark provided some resource areas that this review can start with, i.e. Chapter 6 of the Bio-regional assessment document and Headwaters documents.
 3. Develop a sample Purpose and Need that addresses S/E. The Region felt that Chapter 5 of the Leadership Intent was a beginning point for describing the Desired Condition for the P/N.

To assist you with the information that is discussed above, I suggest you work with Sean Curtis, Modoc County Farm Bureau. Sean is a member of SFAC and also has worked on the committee that is working to develop the S/E element with the Regional Office.

The final statement in relation to the issues of slope restrictions on ground-based equipment as well as adequate social and economic analysis relates to the current White Paper and Ecological Restoration effort that Region 5 is working towards. The Forest Service in Region 5 is currently working collaboratively to gain support for their identified ecological restoration needs. These needs are also centered on forest and watershed health as well as

the social and economic wellbeing of our rural mountain counties. The Regional Forester has recognized the critical need to increase the number of acres being treated on a yearly basis by a factor of 4 to 5 times the present rate. This restoration scale is necessary if California wants to assure that our public forests are in a health state to assure watershed protection and the quantity and quality of water delivery from our National Forests. This needed restoration work will never be accomplished through limitations on areas where ground-based equipment can work. Currently the Region is working with the Sierra Nevada Conservancy and industry to address current Forest plan ground-based restrictions. We know that new technology has been introduced that allows for increasing the percent slope that can be considered for ground-based equipment. To date, two field reviews have been held and at least one forest, the Plumas, has taken this concept forward into project NEPA documentation. If the work described above is to ever come to fruition, each project must take into account the fact that there are already adequate protection measures and that to limit further the use of ground-based equipment will not assist in increasing the pace and scale of needed forest treatments. In addition, social and economic impacts must be given proper analysis and consideration.

I thank you for the opportunity to comment on the proposed Lassen project.

Sincerely,

A handwritten signature in cursive script that reads "Bill Wickman".

Bill Wickman,
Sustainable Forest Action Coalition Consultant
Spokesperson for the Sustainable Forest Action Coalition

Cc Sean Curtis
CFA, Sustainable Forest Action Coalition
CFA