

The post treatment canopy closure requirements need to be removed. The intent of the exemption is to reduce fuel, eliminate vertical continuity of fuels and limit horizontal continuity of fuels. Requiring a certain base level of canopy closure is a tool to retain canopy for closure and understory shading. This is counter to the intent of the exemption. Promotion of a more open canopy is necessary to achieve resiliency and compliance with retention of overstory trees can be achieved with the stocking level and QMD requirement. The canopy closure requirement also adds a level of agency follow-up and cost that is not necessary to achieve the desired results.

All the above comments and suggestions also apply to the older rule language contained in the Emergency Notice for Fuel Hazard Reduction (1052.4). Sierra Pacific Industries requests that the Board review the consistency of requirements between these two rules and how they can be complementary to each other. These two rules and their use by forest landowners are the key to increasing the pace and scale of fuel reduction across the state and achieving the commitment in the Million Acre Strategy.

There remains a need to continue the effort to make changes within the rules to encourage forest landowners to retain their forested lands as forests and to manage them in a way that restores their resiliency to the effects of fire and drought. Continued active management of our forests are important and necessary and the worst thing we can do is make the management of them unattainable. The Board must take the lead in facilitating the responsible and economically viable management of the forests in our state to ensure they continue to be forests that provide clean air, clean water, valuable habitat, and sustainable wood products well into the future.

Sincerely,

A handwritten signature in black ink, appearing to read 'Eric Sweet', with a stylized flourish at the end.

Eric Sweet
North Sierra Area Manager