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April 19, 2022

Pacific Southwest Regional Office, R5
Ecosystem Planning
Post Disturbance Hazardous Tree Management Project
1323 Club Drive
Vallejo, California 94592

Re: R5 Hazard Tree Project

Regional Office,

Thank you for the opportunity to comment on the Post Disturbance Hazardous Tree Management Project. The below referenced observations are specific to Klamath, Mendocino, Six Rivers, and Shasta-Trinity National Forests, however our comments are applicable to all National Forests within the project area.

Timber Products Company (TPC) employs approximately 1,200 people with family wage jobs in 10 manufacturing facilities as well its affiliate partner Michigan-California Timber Company (MCTC) that owns and manages over 114,000 acres of timberland in Northern California. TPC operates as a managing arm of the timberlands to care for not only the timber, but the entire ecosystem. Additionally, our softwood veneer mill located in Yreka, CA is one of just two mills remaining in Siskiyou County, and is dependent on timber generated from both Region 5 and Region 6 for its continued viability. Currently, TPC holds 4 National Forest contracts with associated remaining volume of approximately 18 MMBF.

After reviewing the actions proposed within the cover letter dated April 8, 2022 and its attached EAs, both TPC & MCTC strongly support the proposed project and its overall purpose and need for action:

TPC is glad to see Region 5 proposing post-disturbance hazardous tree management projects. The proposed felling and removal of hazardous trees adjacent to roads, trails, and facilities has potential to provide cumulative benefits which extend far beyond just hazard removal, such as but not limited to:

- Useful timber products to the American public.
- Reduce fuel loading and hazards.
- Provide defensible usable space which can be implemented in future suppression efforts.
- Reduce continued carbon emission resulting from the decaying trees.

- Increase carbon sequestration by creating storage in the form of usable wood products.
- Providing jobs in rural communities.
- Maintaining our roads, trails, and facility infrastructure on the national forest for both public access and use, as well as future wildfire suppression efforts.

Over the past several years forest fires have become larger and more frequent than ever. While some forest fires are a natural occurring event, the increasing severity of these fires are causing increasingly long lasting significant negative impacts on the environment, wildlife, and people. Some of the known consequences resulting from recent fires is the loss of forested landscape and ground cover which causes increased water runoff, soil erosion, loss of critical habitat, and increased fuel loading and future wildfire risk.

When no post fire action or management takes place similar to the outcome of the 2020 & 2021 fires within this project, the end result is a form of deforestation. Vegetation that eventually gets re-established is generally not a forest, but rather a brush land frequently including invasive species. This scenario is of an ecologically lower value, and one that's more likely to burn again in the future. This outcome not only negatively impacts our forested lands and wildlife, but also continually puts our local communities and public at risk.

The cover letter states that the Regional Office is still considering whether or not to seek an Emergency Situation Determination (which would waive the pre-decisional objections process under 36 CFR 218) or use other emergency authorities to expedite implementation of all or portions of these projects. We strongly support and encourage to the Regional Office to take action and use all options of its authorities to expedite implementation of this project, along with any future projects of this nature as a result of fire disturbance. The sooner implementation takes place, the sooner the negative impacts and hazards can be mitigated/minimized that are currently present. This would also provide a sooner and safer timeframe to conduct the proposed operations prior to the onset of further decay of the already present dead/damaged hazardous trees.

Another benefit of implementing the project as soon as possible is the forests would have the ability to sell commercially viable timber to the local mills. Creating commercial wood products from this project could also reduce costs and/or provide potential increased funding that can be reallocated back into additional projects such as restoration efforts. The project will also get more contractor interest if there is still merchantable products being produced from the hazard trees. This would create added project benefits by supporting local industry, providing useful raw materials to maintain a robust manufacturing sector in our local communities, while at the same time reducing negative impacts and risks resulting from these wildfires.

Another recommendation for this project is to have a plan of action to minimize burden and liabilities to contractors and purchasers. Examples of these burdens are haul routes and road use fees. Many times contractors and purchasers are forced to use and pay road use fees for haul routes that aren't the shortest and most direct route. Additionally, it must

be recognized that the timing of the project being 1-2+ years post fire is going to produce a commercial product of a reduced value. These types of fees should be administratively reduced in a way that reflects the amount of commercial value, even eliminated (or taken care of within USFS) at times due to the circumstances.

Additionally, we recommend removing the requirement of applying compounds like borate to all cut surfaces greater than certain diameters to prevent the introduction of root diseases. Not only is this unnecessary and wasteful, but it also adds a huge cost and complication to the project for contractors and/or purchasers. Rather, only require applications to areas that are known to be infected or are located directly adjacent to areas where the root diseases are known exist, or eliminate the requirement completely.

Our business depends on the Forest Service's timber program. As the Pacific Northwest timber supply is expected to continue to decline as a result of drought conditions, wildfires, and beetle infestations, it's essential the Forest Service not just remove hazard trees, but also grow its timber and timber program to sustain its forests and the milling infrastructure and forest sector workforce. TPC strongly encourages the regional office to expand and develop additional Post-disturbance projects similar to this project which extend far beyond just roads and trails that will result in large scale reforestation efforts for continued forest viability.

Thank you for the opportunity to provide scoping comments on the Region 5 Post-disturbance Hazardous Tree Management Projects. We look forward to following the implementation of this project as it moves forward.

If you have any questions or need any additional information please don't hesitate to call at the phone number listed at the top of the page.

Sincerely,

Travis Salvestro

Travis Salvestro
Timber Products & Michigan California Timber Company Representative
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