Data Submitted (UTC 11): 6/20/2022 7:00:00 AM
First name: Travis
Last name: Salvestro
Organization: Timber Products
Title: Log Procurement
Comments: Timber Products has attached a pdf document which outlines its comments and support regarding the Antelope and Tennant Fire Recovery #61649. If there is any trouble viewing the document, or additional information/clarification is required please contact me at the provided information.

Thank you for the opportunity to comment on the Antelope and Tennant Fire Recovery Project. Timber Products Company (TPC) employs approximately 1,200 people with family wage jobs in 10 manufacturing facilities as well its affiliate partner MichiganCalifornia 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 project proposal referenced within the scoping documents dated May 13th, 2022, TPC strongly supports the overall proposed project and its purpose and need for action: TPC is thrilled to see the Goosenest Ranger District proposing the combination of the fallowing twelve post-fire treatments: (1) Roadside Hazard Tree Removal; (2) Salvage for Site Preparation; (3) Site Preparation for Reforestation [ndash] Competing Vegetation Control; (4) Site Preparation for Reforestation [ndash] Fire Damaged Soils; (5) Planting; (6) Release; (7) Mastication; (8) Underburn; (9) Meadow and Riparian Restoration; (10) Native Grass Seeding; (11) Dwarf Mistletoe Sanitation; and (12) Water Systems Repair and Replacement. All of which have potential to provide cumulative benefits which extend far beyond just fire recovery, such as but not limited to: ? Useful timber products to the American public. ? Maintain/improving the Klamath National Forest[rsquo]s stand health. ? Improve forest[rsquo]s resilience to future wildland fire, insect, disease. ? 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, use, and future wildfire suppression efforts. Over the past several years forest fires like the Antelope and Tennant Fires have become larger and more severe 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, increased fuel loading, as well as future wildfire risks. When no action/management takes place under post fire conditions like what is present on the Antelope and Tennant Fires, the end result is a form of deforestation. The vegetation that gets re-established is generally not a forest, but rather a brush land (including invasive and non-native species) of an ecologically lower value that's more likely to burn again in the future. This not only negatively impacts our forested lands and wildlife, but also continually puts our local communities and public at risk. Although forests are sometimes capable of regenerating naturally to some scale after historically low intensity fires, this process takes a tremendous amount of time. The more recent fires like the Antelope and Tennant Fires are burning at such extreme severities that seed banks are completely destroyed and the soil is left in a hydrophobic degraded condition. All of these conditions were already visibly present and ongoing at the time of the of this project[rsquo]s field tour. All of the project[rsquo]s proposed actions are necessary to minimize and mitigate these negative impacts occurring on and off site. TPC is especially glad to see the first goals listed pertinent to this proposal as per the general Forest Plan: ? Provide a programmed, non-declining flow of timber products, sustainable through time ? Maintain conifer stocking levels and high growth rates commensurate with the capability of the site to produce wood fiber. ? Intensively manage young, regenerated stands to maximize growth

potential. ? Maintain stand health, as well as resilience to wildland fire, insect, disease, and other damage. Emphasize salvage and restoration from catastrophic events. However, it is highly concerning that we are approaching the 1 year date of both the Tennant Fire (June 28, 2021), and the Antelope Fire (August 1, 2021) and we[rsquo]re are only in the scoping phase. This brings up the question of how will the forest be able to meet the above listed goals for the proposed project? Especially when the total acres proposed for treatment (56,504) is only 48% of the total project area boundary, and 58% of the combined Antelope and Tennant fire acres on the Klamath National Forest. Additionally of the 98,057 acres, 68% (66,288 ac.) burned at high to moderate burn severities, yet only approximately 13,178 acres are being proposed for salvage & roadside hazard tree removal treatments combined, with only 25,109 acres proposed for re-planting. These numbers in proportion to the amount of high severity burned acres will not result in a programmed, non-declining flow of timber products, sustainable through time. Nor do they emphasize salvage after a catastrophic event. Nor are the proposed treatments allocated in proportions similar to what is listed in the Klamath National Forest Land and Resource Management Plan (Forest Plan, as amended) provided in the project proposal. TPC & MCTC strongly encourage the forest to implement the proposed project as soon as possible and at a minimum starting scale of what is proposed just to keep this process moving forward. Preferably the forest will continue additional restoration operations including salvage and conifer planting on all remaining areas which burned under various intensities that will continued to degrade from varying amounts injury and mortality as a result of; crown scorch, girdled stems from cambial heating, root damage resulting from soil heating, insect attacks, and/or a combination thereof. This mortality is generally not as obvious due to the fact that it takes time to become apparent to the untrained eye. Directly after the fire some of these trees still retain various amounts of green needles for extended amounts of time, even though the tree is dead or dying as a result of one or more of these injuries. Similar to a Christmas tree that has been cut down and inside a residence, but is still green for months after. TPC also strongly encourages the use of any means available that would help expedite the actions proposed in the project, including the categorical exclusions (CATEXs). The sooner implementation takes place the sooner the negative impacts can be mitigated and minimized that are currently occurring. This would also provide a safer timeframe to conduct the proposed treatments prior to further decay of the already present dead/damaged hazardous trees resulting from the fire. An added benefit of implementing the project as soon as possible is the forest would have the ability to potentially market the merchantable timber generated by salvage operations to the local mills. Creating commercial wood products from this project could also reduce the projects costs and/or provide potential additional funding that can be reallocated back into additional restoration efforts. 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. TPC strongly encourages the forest to remove/amend item Silviculture-1 requirement which requires [ldquo]cut surfaces of stumps 14 inches in diameter and greater to be treated with California registered borax fungicide to prevent the introduction of Heterobasidion Spp root disease[rdquo]. Not only is this unnecessary, but it also adds a huge cost and complication to the project for contractors and/or purchasers. Rather, only require a borax application to areas that are known to be infected and/or are located directly adjacent to areas where the root disease is known exist. TPC strongly encourages the forest to remove item Wildlife-B requirement which requires [ldquo]an average of 10-14 snags per acre will be retained, in groups of at least 3-5 snags, on at least 75 percent of the acreage in each cutting unit[rdquo]. Rather allow for item Wildlife C [ndash] [ldquo]Snags or dying trees that contain cat faces, broken or forked tops, hollows or cavities, burned out cavities, or those that are otherwise damaged to the degree that a cavity may form will be favored for retention[rdquo] to meet the snags/acre retention objective criteria. These types of snags provide the highest potential wildlife benefit. TPC strongly encourages the use of herbicides as Site Prep (veg control) tool in areas proposed for conifer planting. At the very least it can be implemented as research plots which will allow for the continuation of the already present research study that was present within the proposed project area before the fires. This would not only increase the amount of successful reforested acres, but also provide an opportunity to compare various types of site prep and their effectiveness that the general public may not be aware of. Again, thank you for the opportunity to provide scoping comments on the Antelope Fire Restoration Project. Besides encouraging the KNF to increase the pace and scale of the proposed project and some criteria amendments, Timber Products Company (TPC) strongly supports the overall proposed project and its purpose and need for

action. We look forward to following the implementation of this project as it moves forward.