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Comments: The comments below are submitted on behalf of the American Forest Resource Council (AFRC) and California Forestry Association (Calforests).

AFRC is a regional trade association whose purpose is to advocate for sustained-yield timber harvests on public timberlands throughout the West to enhance forest health and resistance to fire, insects, and disease. AFRC promotes active management to attain productive public forests, protect the value and integrity of adjoining private forests, and assure community stability. We work to improve federal and state laws, regulations, policies, and decisions regarding access to and management of public forest lands and protection of all forest lands. AFRC represents over 50 forest product businesses and forest landowners throughout California, Idaho, Montana, Oregon, Washington, and Nevada. These businesses provide tens of thousands of family-wage jobs in rural communities.

Calforests consists of private industrial forest owners, managers, and woods operators, as well as sawmills, veneer mills, and several biomass powerplants. Our members are committed to sustainable management of our private forest resources and supporting active forest management of National Forests within California. Much of California's forestry infrastructure is partially dependent on wood supply from the National Forests. Calforests actively promotes sustainable National Forest management providing healthy forests that are resistant to natural disturbances.

The comments below are provided following specific section heads from the Table of Contents, chapters 1-4, of the DEIS.

Purpose and Need

The Overview & Purpose & Need statements are good descriptions of the problems the Stanislaus National Forest faces and provides an excellent list of complimentary objectives to respond to. (DEIS, p. 14). We support the proposed action of adding condition-based analysis for timber salvage. We also believe some attention to carbon sequestration is relevant and should be included particularly the negative effect of mortality.

We urge the Forest Service to fully implement the proposed alternative as it is currently described in the EIS. Maximum attainment of the Purpose and Need can only be met if the treatments proposed are implemented at the highest scale.

2.07 Condition-based salvage (DEIS, pp. 31-34)

RE: Section 2.07, Pages 31-36 include the relevant design features. Essentially, they are trying to work in options for potential timber salvage in the project area that do not currently exist. The EIS states:

To be clear, the salvage proposed is designed to react to a potential future condition that does not currently exist. This type of proposed action is commonly referred to as "condition-based." The inclusion of condition-based management in project planning is not universally accepted as an appropriate methodology. Those opposed to condition-based management believe that condition-based management does not provide the site-specificity necessary to meaningfully assess the potential environmental impacts, to inform the responsible official's decision-making process or the public's ability to provide feedback on the project. In recognition of these concerns, the proposed salvage includes spatial, temporal, and conditional constraints. These constraints identify the area of potential salvage, when the salvage would occur - or what would trigger a salvage action, and other

specific constraints which limit the salvage actions.

We believe this is an excellent approach to address the future need for salvage of insects, disease, and burned trees. The "constraints" referenced here and listed in the DEIS seem reasonable. The most significant hurdle may be the preparation of a "cumulative watershed effects analysis."

Impact of mortality on air quality and carbon sequestration

We are pleased to see a robust analysis of climate change and greenhouse gas emissions in the supplemental Report. We are also pleased to see that Report acknowledge the important role that long-lasting wood products have in overall carbon storage as well as the substitution benefits of supporting the wood products sector. We believe that timber harvest and utilization of wood products is a key component of combating the effects of climate change.

Well stocked and growing forests pull carbon from the air and sequester it. Dead trees in the process of natural decay release carbon dioxide, and perhaps more important, produce and release methane. Methane is at least 25 times more potent than a greenhouse gas compared to carbon dioxide. Methane produced in decaying standing dead and down trees produce trunk gas methane concentrations up to 80,000 times atmospheric concentrations (Attachment #1, p. 7). Other research regarding methane in decaying trees can be found at: <https://news.yale.edu/2012/08/08/diseased-trees-are-source-climate-changing-gas>. This publication states: "If we extrapolate these findings to forests globally, the methane produced in trees represents 10 percent of global emissions."

See the methane flare from a decaying standing tree (Attachment #2).

Salvage (DEIS, pp. 47-48)

We believe applying "slash" to skid trail footprints may provide a good reduction in erosion hazard but introducing flammable material that provides a continuous conduit for fire across the skid trail is not a good idea. We believe straw mulch and/or waterbars is the most effective overall method. Dozer trails provide excellent fuelbreaks; adding slash back into the footprint defeats part of the purpose for the skid trail and makes it difficult to reopen if needed again as a fuelbreak for a prescribed fire or to stop a wildfire.

Reduce Stand Densities (SDI) (DEIS, pp. 151-152)

The DEIS (p. 192) cites North et al. (2009) for the landforms in Figures 8-9 (p. 22) [CK1] and North et al. (2022) Operational Resilience (p. 152). The DEIS text specifically points to pre-settlement stands averaging 23-28% of the maximum stand density index (SDI). But then, it appears the North et al. (2022) research is not used in selecting a desired structure within forest stands. Rather the DEIS targets an SDI range of 50-200 (DEIS p. 21).

We believe these desired SDI ranges are far too high for all three forest types displayed. They should be reduced significantly, which would lower the target basal areas as well.

AFRC and Calforests greatly appreciates the opportunity to comment on the Seral 2.0 draft environmental impact statement.

[CK1]I assume this is page 22 of the north study