



Sierra Pacific Industries

301 Hagara Street • Aberdeen, Washington 98520 • (360) 532-2323

October 30, 2018

Yewah Lau
District Ranger
Hood Canal Ranger District
Olympic National Forest
1835 Black Lake Blvd. SW
Olympia, WA 98512

c/o Kim Crider

In Reply to: Wynoochee Restoration and Road Management Project

Dear Ms. Lau:

Sierra Pacific Industries wishes to submit comments for scoping on the Wynoochee Restoration and Road Management Project.

Sierra Pacific Industries is a family owned company that has two mills in close proximity to the proposed project. We have mills in Aberdeen, WA and Shelton, WA directly employing close to 500 employees. Our mills are state of the art mills that were designed for the smaller logs that come off the Olympic National Forest. Currently, we have the largest amount of timber sale volume under contract on the Olympic National Forest which gives us a unique perspective when commenting proposed actions. It is in our best interest that the USFS maximizes timber removals under current rules and regulations. We are dependent on USFS timber for a portion of our log procurement program as well as the contractors that we hire to complete these projects.

In the scoping notice, it is stated that this area was degraded over the past decades as a result of road construction and timber harvest. I strongly disagree with this statement. The main reason for the degradation of the forest stands and forest roads is **the lack** of forest management. Timber harvests in the prior decades paid for the road construction and maintenance as well as improved forest health. It is stated that the purpose of this project is to increase structural and habitat diversity and increase the development of late successional forest characteristics by reducing the density of forest stands in late LSR's and AMA's. I think with our expertise we can help with this. Many of the projects we are working on the thinning has not been aggressive enough to achieve the desired future condition because of the small spacing requirements and diameter restrictions in LSR's (no tree over 24" stump diameter cannot be removed). Most of these stands are 50-70 years old dominated by stands of hemlock and df averaging 17" dbh. It is my opinion that you cannot achieve the desired qualities of late successional

forests without increasing the diameter over 24" stump diameter to make "real gaps" and desired basal area and relative density. Please ask the region office to increase the diameter so larger gaps can be achieved and more volume per acre can be removed and sent to the mills. In the AMA's please you all the tools allowable (similar to the H to Z project we completed) to maximize the volume removed from the area and at the same time have a project in my opinion will help reach desired future conditions. I urge you to use "designation by prescription" to designate trees for removal (exactly what you used in H to Z and Big Stew).

I wanted to provide a few comments on the restoration thinning proposed action. The table has cable thinning (2895 acres), ground-based thinning (1085 acres) and downhill cable thinning (686 acres). Please clarify downhill thinning. Is the yarder at the bottom of the unit?? I would urge you to remove the largest number of trees per acre possible in the cable portions to alleviate some of the costs. Cable thinning runs about \$40/ton versus ground-based thinning of \$28/ton. Those costs can be reduced by simply removing more volume and properly laying out the harvest units with the largest volume per turn.

Temporary roads should be built only as "logger choice" roads that will be the minimum needed to remove the volume in the units. Upgrading the specified roads to a level suited for hauling of forest products is all that's needed.

I am strongly against abandoning roads that will be used in the future. If the USFS chooses to abandon the roads, please use the "light" abandonment approach by putting a tank trap or gate to close the roads. I am against the removal of fully functioning culverts that are working properly. I have visited some of the projects that the road was completely decommissioned and a human could barely walk on them. These are assets paid by the taxpayers and need to be preserved with that in mind.

Thank you for the opportunity to comment.

Sincerely,

David A Marshall Jr.

David A. Marshall Jr.

Timber Manager