



ASSOCIATED LOGGING CONTRACTORS, INC.

Nez Perce Clearwater National Forests
Attn: Zach Peterson, Forest Planner
903 3rd Street
Kamiah, ID 83536

April 20, 2020

Dear Mr. Peterson:

I am writing to provide comments on the Draft Environmental Impact Statement for the Nez Perce-Clearwater Forest Plan Revision on behalf of the Associated Logging Contractors of Idaho (ALC). The ALC is a 501(c)(6) non-profit trade organization whose 480 members are individual logging and wood products hauling businesses located in Idaho. All of our members' businesses are small, family owned operations and many of them are multi-generational. The owners, their families, their employees and the families of the employees not only work in our forests, they live in the rural towns within the forests. In short, we have a vested interest in responsible, sustainable management of our national forests.

This Plan will guide the Forest for at least 15 years and the ALC believes it important to develop a Plan that reflects the needs of the Forest, forest users, local communities, counties, and businesses that depend on the Nez Perce-Clearwater.

The Forest covers over 4 million acres and grows the equivalent of over 600 million board feet per year, but annually has only been harvesting 46 million board feet per year over the past 30 years. Due to this lack of management dense stands of timber and ground fuels are now present which has resulted in catastrophic wildfires that have ravaged approximately 53 percent of the Forest. This is an alarming number of acres burned and quick action must be taken in the Plan to reduce the threat of fire and insects and disease. Thick stands of grand fir, cedar, Engelmann spruce and lodgepole which are very conducive to wildfire now dominate the landscape instead of more fire resistant species such as white pine, western larch and ponderosa pine. According to the National Insect and Disease Risk Assessment, 65 percent of the Nez Perce-Clearwater - excluding wilderness and roadless areas- are at risk of wildfire, insects and disease. This Plan must direct efforts to reduce fires and convert the Forests to their Historic Range of Variation in the next 20 years - not 50 or 100 years.

The economic health of the eleven counties that are in the economic analysis zone around the Nez Perce-Clearwater National Forest working area are dependent on the jobs that are generated from managing the Forest. Many of the members of the ALC work in these jobs. The State of Idaho statistics show that for every one million board feet of timber harvested 18 jobs are created. A survey of the general public in the secondary social analysis area indicates that 37

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percent of residents believe that providing income to the timber industry is a very or extremely important purpose of their local, federal public lands. The ALC would like to see the Forest select a harvest level of **at least 200 million board feet per year** which would generate about 3,600 much needed local jobs.

As mentioned above much of the Forest now has dense stands of timber with little or no forage for deer and elk. Thus the populations of big game species have dropped off substantially over the past three decades. The new management strategy needs to include a regime of regeneration harvests over 40 acres in size to convert those stands to more fire resistant white pine, western larch, and ponderosa pine species, and to provide forage for big game species.

There are currently 35 Roadless Areas on the Forest totaling almost 1.5 million acres. We favor a management strategy that will allow for commercially treating a good portion of those acres. Without treatment the Forest will continue on a path of large wildfires and loss of resources. Therefore, we are opposed to having large portions of these Roadless Areas put into the potential wilderness study area allocation.

Access to Idaho's National Forests are important to the members of the ALC. We would like the new Nez Perce-Clearwater Forest Plan to acknowledge the importance of maintaining local communities, counties, and our rural way of life which is heavily reliant on forest products businesses.

Thank you for considering the ALC's comments on this very important planning process for the future of the Nez Perce-Clearwater National Forest and for northern Idaho.

Sincerely,


Shawn Keough
Executive Director