



SIERRA PACIFIC INDUSTRIES

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VIA online submission: [Comment Analysis and Response Application \(CARA\)](#)

October 24, 2023

Okanogan-Wenatchee National Forest
Wenatchee River Ranger District
c/o Justin Gelb
600 Sherbourne St.
Leavenworth, WA 98826

Dear Justin:

On behalf of Sierra Pacific Industries (SPI), thank you for the opportunity to provide comments for the Chumstick to Lower Peshastin (LP) Project.

SPI is a third-generation family-owned company based in Anderson, California that employs over 6,000 employees nationwide and operates a combined 16 sawmills in California, Oregon, and Washington. These sawmills rely on timber that is generated on Federal Forests, including the Okanogan-Wenatchee National Forest.

In general, SPI supports the Chumstick to LP Project, including the Purpose and Need, and offers the following comments.

1. SPI supports the purpose and need for the project but would like to see a fourth purpose of the project which is listed as a goal in the landscape evaluation document, *Enhance rural economic development*. A significant portion of the Chumstick to LP landscape is designated as Matrix by the Northwest Forest Plan, especially in the central part of the project area. It is important to recall that a primary objective of Matrix is to provide raw materials to local communities on a long-term, sustainable basis. SPI suggests treating as many acres as possible, while ensuring that treatments implemented, or lack of treatments, with this project will not jeopardize the long-term sustainable supply of fiber that these lands are designated for. Furthermore, portions of the north and south areas of the project are designated as Late Successional Reserve (LSR). SPI strongly supports active management to reduce hazardous fuels and mitigate the risk of wildfires across the entire LSR land designation. It is especially needed in the northern and western edge of the project.
2. The landscape evaluation document states that *further work is needed to assess Potential Control Lines (PCLs) locally for their condition and detailed treatment needs, which will depend on management goals and values at risk*. SPI recommends identifying and implementing PCLs quickly, especially in the highest risk areas. One concern is that the PCLs will not be implemented quick enough (prior to the next wildfire event), which could result in a loss of current forest structure, habitat, and

local infrastructure. All PCLs should be wide enough and void of enough vegetation that will allow for effective fire suppression efforts. Also, any PCLs, and/or access to PCLs, that are planned and treated should be expected to be maintained on a regular basis and to a level that meets the objective of the project. Furthermore, PCLs should be located across the landscape in a manner and density that minimizes the size of each Potential Operational Delineation (POD). Some of this work may not be cost effective if sold within a timber sale contract, so it is recommended that other funding sources be explored.

3. Although maintenance to the existing road system is proposed, it is unclear if temporary roads will be needed or allowed under the current proposal in order to implement the project to the full extent. The project area contains difficult operational terrain that could potentially be made more feasible by allowing the use of temporary roads. If further investigation is required to assess road access requirements, as is true for PCLs, SPI recommends allowing for the use of temporary roads in order to maximize the acres treated. The first objective of the project is to reduce elevated risks of wildfire to the communities who reside within the wildland urban interface. This objective should be met to the full extent possible, not limited by access restrictions.
4. Economics in this area are, and will continue to be, extremely important. There has been ongoing dialogue between forest service staff and various stakeholders regarding the current status of the pulp log and chip markets. With the closure of multiple pulp and paper facilities in Washington (and other locations) there is currently an oversupply of chips on the market and likely will be for the foreseeable future. This is a concern because of the amount of high-density small diameter trees located within the project area. This material was already of low value prior to 2023, but now there is absolutely no value. SPI recommends that any small diameter tree/pulp removals be made under a different mechanism than a timber sale contract. Other funding sources may need to be explored in order to complete this necessary work and meet the three project objectives.

Thank you for the opportunity to provide comments on the Chumstick to LP Project. We look forward to the project moving forward quickly.

Sincerely,



Adam Ellsworth
Log Procurement Manager
Sierra Pacific Industries
Burlington Division