



Via: <https://www.fs.usda.gov/project/boise/?project=67427>

May 12, 2025

Brant Petersen, Forest Supervisor  
Attn: Brian Lawatch  
1249 S Vinnell Way Ste 200  
Boise, ID 83709

Re: Snag Nellie Project EA FONSI Comments

Dear Mr. Petersen:

On behalf of the American Forest Resource Council (AFRC) and its members, thank you for the opportunity to provide comments on the Decision Notice and Finding of No Significant Impact (FONSI) on the Snag Nellie Project (Snag Nellie) on the Boise National Forest. AFRC both appreciates, and is very pleased, to see the District utilizing Emergency Situation Determination authorities for this Project. The Snag Nellie project area is found along the Warm Lake Highway (Highway 22) between Cascade and Warm Lake; the Nellie project area can be found east of Garden Valley and west of Lowman along Highway 17 to the south and Deadwood Reservoir. The project area encompasses approximately 83,511 acres and all proposed actions will occur on National Forest System lands. This area is very important and popular to the residents of the area and to AFRC members.

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. We do this by promoting active management to attain productive public forests, protect 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 the West. Many of our members have their operations in communities adjacent to the Boise National Forest and the management on these lands ultimately dictates not only the viability of their businesses, but also the economic health of the communities themselves. The state of Idaho forest sector employs many Idahoans with AFRC's membership directly and indirectly constituting a large percentage of those jobs. Rural communities, such as the ones affected by this project, are particularly sensitive to the forest product sector in that more than 50% of all manufacturing jobs are in wood manufacturing.

Our members depend on a predictable and economical supply of timber products off Forest Service lands to run their businesses and to provide useful wood products to the American public.

The purpose of the Snag Nellie Project is to address and mitigate the impacts to the landscape from the 2024 Snag and Nellie Fires and the specific needs include: hazard tree mitigation, commercial salvage, reforestation, range management, re-vegetation of non-forested areas, infrastructure repair, and recreation and access management. AFRC fully supports the purpose and need for the Snag Nellie Project.

Standard utilization specifications used on green Forest Service timber sales will not likely be appropriate for the salvage sales generated from this Project. Due to the damaged nature of the timber products being proposed for harvest, there will be an unusually high level of uncertainty by the Forest Service and prospective purchasers of the actual value of those products on the stump prior to harvest. This uncertainty is exacerbated by the fact that additional time for wood deterioration will elapse between the time of purchase and the time of harvest. Therefore, the Forest Service should be ***developing minimum removal requirements and utilization specifications that align with this uncertainty***. Purchasers will recover as much value from these damaged products as possible. Requiring them to recover value that is not available will reduce the likelihood that these sales will successfully sell.

The EA indicates that standard timber sale contract design features will be utilized on the Snag Nellie project. Given the remote location, the distance to milling facilities and the fragile condition of burned timber, standard requirements such as dust abatement can make a project economically unviable. AFRC strongly recommends that a field trip with industry to review the proposed commercial harvest take place as soon as possible.

Thank you for the opportunity to provide comments on the Snag Nellie Project. I will be in contact with you soon regarding a simple industry field trip to review and provide feedback on the viability of the proposed commercial harvest.

Sincerely,



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