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Organization: Bennett Lumber Products Inc.

Title: Resource Manager

Comments: Bennett Lumber Products Inc.

January 12, 2023

Objecting Reviewing Officer

USDA Forest Service Northern Region 26 Fort Road, Missoula, MT 59804

RE: Nez Perce-Clearwater National Forest Plan Revision, Draft Record of Decision Objection

Please accept the following Objections from Bennett Lumber Products Inc. concerning the Nez Perce-Clearwater National Forest Plan Revision. Bennett Lumber Products Inc. initially commented on the Forest Plan Revision on April 2, 2020. Bennett Lumber Products Inc. is a family-owned small business with sawmills located in Princeton, Idaho and Clarkston, Washington. Combined these two mills employ 240 people and are important contributors both socially and economically to their respective communities. Both mills have current timber sale contracts and a long history of dependence on the Nez Perce-Clearwater National Forest for a supply of logs to source its mills.

The importance of the Nez Perce-Clearwater National Forest to local communities cannot be over emphasized. For that and other reasons, Bennett Lumber strongly supported Alternative X as described in your Initial Draft Forest Plan. This alternative provided the most potential for jobs to struggling communities as well as addressing the numerous silvicultural and forest health issues currently facing many stands within the Nez Perce-Clearwater National Forest. As you accurately described, there exists a disproportionate amount of Grand Fir and Douglas Fir on warm sites throughout the Forest. Aggressive management within these stands is required to shift towards a better ecological balance and species composition.

While your Preferred Alternative does propose an increase in forest management and an acknowledgment of the importance the National Forest has on the economies of small rural communities, it still falls drastically short on the number of potential Timber Harvest Acres and Sale Quantity Outputs as originally proposed in Alternative X. While the current acreage and outputs by the Forest for vegetative management are lower than the Proposed Alternative it still does not adequately address the serious issue of declining forest health and wildfire risk on many stands within the Forest. Bennett Lumber encourages the Planning Team to consider an increase in the number of treatment acres and outputs to address this issue. With the high amount of mortality, overstocking, wildfires and at risk stands currently on the Forest, Bennett Lumber feels it is better to set the target higher than lower. Lower target acres and outputs could reduce the potential to treat this problem over the life of the Forest Plan.

Bennett Lumber Products Inc. also has concerns with the wording of MA2 and MA3-GDL-SOIL-01. The statement limiting ground-based equipment to 45% or less could potentially limit operators using teather assisted logging equipment. Many logging contractors have made substantial investments in teather assisted equipment to increase safety and effectively harvest trees with reduced labor due to lack of employable personnel. In most cases, a teathered harvesting system is lighter on the ground than conventional cable harvesting. The Forest Service has worked well with industry to help implement this new system. Placing strict slope limits may hinder

the ability of on ground administrators to allow use of this new technology when feasible. Bennett Lumber encourages the Planning Team to reword this requirement "encouraging variances" for teathered logging systems regardless of slope percentage when feasible.

Bennett Lumber Products Inc. appreciates the opportunity to give input on this important topic.

Sincerely,

Torn Biltonen

Resource Manager

Bennett Lumber Products Inc.