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First name: Tera R.

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Organization: Idaho Forest Group

Title: Resource and Business Analyst

Comments: Good afternoon-

Please accept the attached comments for the Dead Laundry project on behalf of .

Thank you.

Tera R. King

Resource and Business Analyst

Via Email: comments-northern-clearwater-north-fork@usda.gov

April 14, 2020

North Fork Ranger District

Attn: District Ranger

12740 US HWY 12

Orofino, Idaho 83544

Subject: Dead Laundry Project Proposal

Dear Mr. Skowlund, District Ranger:

On behalf of Idaho Forest Group (IFG), thank you for developing this project and providing us with the opportunity to comment. IFG is a longtime supporter of the Nez Perce-Clearwater National Forests timber program and appreciate the contributions it has made to the surrounding economic areas. With the purchase of the sawmill in St. Regis, Montana, the Dead Laundry project provides potential economic benefits to both Mineral County, Montana and Clearwater County in Idaho.

While we were glad to have had the opportunity to comment on the East Saddle project and now the Dead Laundry project, we are disappointed our timing was off and our local collaborative on both sides of the state line were not able to engage with the planning and field crews as these projects were developed. Fortunately, however, we are familiar with the project area with some of our collaborative members recreating in the project area each year and others that have worked in the area on earlier timber projects. Additionally, we did spend some time recently looking at the project on snowmobiles. As weather permits, we will be in the field more and hope to develop an understanding of what you have planned for future projects so we can engage much earlier in the process.

IFG is a strong supporter of several local collaboratives that have interest in the Dead Laundry project including the Mineral County Resource Coalition (MCRC), the Sanders County Collaborative (SCC), and the Clearwater Basin Collaborative (CBC). Working closely with the two Montana collaboratives and the Commissioners in Mineral and Sanders Counties, we are intimately familiar with the comments the MCRC and the SCC are providing on this project. We understand the economic difficulties that our rural counties all face and without going into great detail and repeating their comments, we want to go on record in support of their submitted comments.

While we advocate for wildlife, fisheries, and recreational interests in all projects, our focus and expertise is on the timber and vegetation management components. We are pleased to see the Forests include 40,565 acres in this project area with 3,597 acres (8.9%) proposed for commercial harvest and another 2,196 acres (5.4%) proposed for non-commercial treatments (landscape burning and mechanical hand). However, combined we are

treating only 14.3% of the total project area. With millions of acres of our National Forests considered to be at risk due to the effects of insects and disease, and the Nez Perce Clearwater National Forests alone having nearly one million acres (excluding wilderness) considered to be at risk, we believe we should be treating substantially more acres with this and other projects. We understand and support the need to address other resource issues on the Forests, but with the majority of the Dead Laundry project area identified by the Forest Plan as MA E1, (MA E1 is designated in the Forest plan as timber producing land to be managed for healthy timber stands and optimal timber growth), we believe more emphasis should be put on the timber and vegetation management in order to improve the trajectory of future healthy forest stands, decrease wildland fire risk in and around the designated WUI, and improve the economic feasibility of the project as a whole. At a minimum, we believe the Forest should be treating 30 to 40% of the project area with a combination of commercial and non-commercial treatments.

IFG supports the Dead Laundry project and the Purpose and Need for Action identified in the Project Proposal with the following comments and suggestions we believe strengthen the project and do a better job of meeting the goals identified for the Purpose and Need for Action. Additionally, we believe these suggestions will improve how the project meets Forest Plan direction.

1. As discussed above, we believe more acres should be treated in the project area. There are opportunities throughout the project area to increase acres treated including, but not limited to the following suggestions:

[bull] Most of the units located around the private inholdings proposed for mechanical hand treatment in the Project proposal could and should be treated as a shelterwood or commercial thin rather than hand treatment.

Located primarily on gentle slopes, these units could be treated with ground-based harvest systems. These units would then become revenue generators rather than cost centers.

[bull] Harvest units are proposed on the east side of road 250 south of road 295. This area down to road 255 has been heavily roaded in the past and provides many opportunities for increased timber production.

[bull] The area around Deception Point has also been heavily roaded in the past with some roads currently being managed as motorized trails. Some units are proposed on the south, but nothing is proposed to the north, east, or west of the Point. There are some great opportunities for additional harvesting in this area that would meet the purpose and need for the project.

[bull] Although not as heavily roaded as other areas within the project, the area around Osier Ridge east of road 737 and across road 295 also provides additional opportunities for increased timber harvest and vegetation management.

[bull] With a desire to see more acres treated both commercially and non-commercially, it is worth noting that hundreds of acres throughout the project area could benefit by some pre-commercial thinning. Increasing the number of acres for timber harvest will provide the necessary dollars to complete this type of restoration work. Additionally, these treatments also serve to improve wildlife habitat for elk and other species.

2. The benefits of treating more acres with timber harvest are numerous, here are a few we would like to highlight:

[bull] Increasing the acres treated improves how the project accomplishes the work identified in the Proposed Action and it does a much better job of meeting the goals identified in the three bulleted items included in the Purpose and Need for Action.

[bull] Improved project economics:

- o Road maintenance and dust abatement costs will have a huge effect on project economics. Spreading these costs over more volume will reduce the cost per thousand.

- o The cost per thousand associated with the reconstruction of 99 miles of roads, construction of 14 miles of permanent roads, and construction and decommissioning 54 miles of temporary roads are reduced by increasing timber receipts.

- o Logging costs will be reduced.

- o Maximizes the amount of timber available to the forest products industry and does more to sustain local and regional economies.

[bull] There are numerous stands throughout the project that could benefit from pre-commercial thinning. More of this work can be included by increasing timber receipts and there are additional habitat and forest health benefits to managing these future stands to the extent possible in a single entry.

[bull] Additional dollars could be available to address "Other Known Resource Concerns" and "Design Features and Mitigation Measures" identified in the Proposed Action.

[bull] Potential benefits to recreation:

- o Existing motorized and nonmotorized trails could be maintained.

- o Existing dispersed recreation sites are scattered throughout the project area. Many of these sites are in need of maintenance.

IFG understands and supports the need to build the right roads and we understand it is also appropriate to decommission redundant or poorly constructed roads. Other than a list of the proposed road activities and the proposed decommissioning of the temporary roads, we don't have detailed knowledge regarding which roads will receive proposed treatments. However, enough information was provided to raise the following concerns with planned road designations and obliterations:

[bull] Our impression is that no existing system roads are proposed to be decommissioned and we support that.

[bull] 54 miles of temporary roads are proposed to be constructed with 25 of those miles on existing road templates from legacy transportation routes. The 25 miles of roads planned on legacy road templates were obviously used to access the areas during past timber harvest activities, probably more than once. It seems clear that these roads have been and continue to be needed for management purposes. These roads should be added to the NFS road system and some other method for long-term storage is likely a more appropriate tool than obliteration.

[bull] In addition to providing access for management of the proposed units in the Dead Laundry project, the proposed road reconstruction and maintenance of the FS system roads will provide access for recreational use and facilitate much needed repairs of roads accessing the area from both Idaho and Montana. Where possible, consideration of loop road and other recreation opportunities should be included in the analysis.

Without being involved earlier in the development of this project, we don't know what other options were considered by the planning team. We understand that many of our comments and suggestions may have already been considered. If so, we want you to know that you have our support and we hope you will consider making them part of this project.

Finally, we believe this project is an excellent fit for a long-term stewardship contract. We have listed a few projects that could be included and would improve forest health and productivity and provide improvements to infrastructure. Additional opportunities for further improvements and restoration opportunities could be included both inside and outside of the project boundary with a stewardship contract. If the Forests were able to include additional commercial and non-commercial project acres, IFG would like to open the door for discussion on whether the Dead Laundry project could be designed or modelled after the "Mill Creek A-Z" and "Chewelah A-Z" stewardship projects on the Colville National Forest.

Thank you for time and consideration of our comments.

Respectfully submitted, Willy Peck
Eastern Division Agency Forester
Mike Reggear
Southern Division Agency Forester