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

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Andrew Skowlund, North Fork Ranger District

Amy Boykin, NEPA Planner

12740 US Hwy 12

Orofino, Idaho 83544

Subject: Dead Laundry Draft Environmental Assessment and Draft FONSI

Dear Andrew,

Once again, Idaho Forest Group (IFG) appreciates the opportunity to comment on the Dead Laundry project, now during the comment period for the Draft EA and FONSI.

The Draft EA proposes commercial treatments on 3,837 acres, an increase of 240 acres from the 3,597 acres proposed during scoping. Proposed non-commercial treatments (including landscape burning) were reduced from 2,196 acres to 1,990 acres, a reduction of 206 acres. Old growth enhancement activities were decreased from 300 acres in the scoping document down to 196 acres in the Draft EA. These proposed treatments represent just under 15% of the total project area of 40,565 acres.

We appreciate and strongly support the addition of commercial units 15-A, 71-A, 58-A, 26-A, 24-A, and 158 and we strongly support the conversion of units 123, 124, 128, 127, 130, 140, and portions of units 139, and 131 from non-commercial to commercial treatments. These changes will significantly strengthen project economics and improve the degree to which the project meets the stated Purpose and Need as described below:

1. Treating more acres with commercial timber harvest treatments will increase log deliveries to our local sawmills, maintain and provide high paying job opportunities, and contribute to the economic needs of rural counties and communities.
2. Revenue generated through timber receipts and increased bid values will dramatically improve project economics by:
  - a. Converting units from non-commercial to commercial treatments will provide economic benefits in two ways. It saves the costs associated with accomplishing non-commercial treatments and generates revenue through added timber receipts.
  - b. Mobilization costs will be spread over a larger volume of timber reducing the cost per thousand for harvesting operations and increasing potential bid values.
  - c. Road construction and maintenance costs will be spread over a larger volume also reducing costs per thousand for harvest operations.
  - d. Dust abatement cost can be substantial and providing the opportunity to spread that cost over more volume will increase net revenues from timber receipts.
3. Treating additional acres will improve forest health on a larger scale, increasing the Forests' resistance and resilience to not just wildfire in a wildland urban area, but also the effects of insects and disease.

IFG is a strong supporter of large forest restoration projects that utilize both commercial and non-commercial vegetative treatments designed to improve forest health and reduce hazardous fuels conditions and we strongly support the Forests decision to convert units described above from non-commercial to commercial treatments. However, we would also like to see the Forest take advantage of the increased revenue generated by these changes and look for opportunities to treat more acres with precommercial hand or mechanized thinning prescriptions. Numerous opportunities for these treatments exist throughout the project area, particularly around the 30 identified structures and access routes.

With millions of acres of our National Forest considered to be at high risk because of insects, disease and wildfire, and the Nez Perce - Clearwater National Forest alone having nearly one million acres (excluding wilderness) considered at risk, we believe substantially more acres should be treated with this and other projects.

The majority of the acres in the Dead Laundry project area are designated in the Forest plan as MA E1, managed as timber producing land for healthy timber stands and optimal timber growth. With this, we believe more emphasis should be put on timber and vegetation management that will improve current and future forest health, decrease wildfire risk, make forests more resistant and resilient to the effects of insects, disease, and wildfire, and improve the overall economic feasibility of the project. If we are serious about our desire to address our forest health issues on a large scale, we should be treating much larger percentages of the project areas. We believe the Forests should be treating a minimum of 30 to 40% of project areas with a combination of commercial and non-commercial treatments.

For the reasons described above, we were disappointed to see the Forest drop commercial units 87, 53, and 28, along with a large portion of 26 and smaller portions of other units. While we were also disappointed to see units 102 and 156 converted from commercial to non-commercial treatments, we were pleased to see they were at least kept in the non-commercial component.

We are supportive of the Forests' decision to include units for old growth enhancement. We agree that this is a limited feature on the landscape and efforts to protect, maintain, and improve intact stands through proactive vegetation management treatments is commended.

We also support the Forests' decision to create openings larger than 40 acres in multiple units. In general, larger openings better mimic natural disturbance regimes and have the dual benefit of improving habitat for ungulates and other wildlife.

While we did not comment on the ADSIRM project, we support the concept and believe there are numerous opportunities to expand on and improve on that process within the Dead Laundry project area. Designed to mitigate hazardous conditions created by dead, dying, and structurally unsound trees directly adjacent to NFS roads, the ADSIRM project has identified 130-mile miles of NFS roads spread across the Forests that are in need of proposed treatments. Roads 736, 5436, 74514, 5437, and 737-B within the Dead Laundry project were identified as part of the ADSIRM project. We suggest these road segments be treated as part of the Dead Laundry project. These roads will all be treated with reconstruction or maintenance work as part of the Dead Laundry project and substantial mobilization costs would be avoided. Additionally, we believe more roads within the Dead Laundry project should be considered for this treatment and or shaded fuel breaks. Specifically, roads 737, 735, 255, and 295 are strategically located for affective fuel breaks.

In closing, we want to thank the Nez Perce - Clearwater National Forests for all the hard work to develop this project and bring it to this very important next phase. We understand the challenges you face today with developing projects that meet public approval while also accomplishing the work required to manage our National Forests for the greater good. We hope our comments will provide support and help accomplish the much needed forest restoration work within the Dead Laundry project area.

Respectfully submitted,

Willie Peck/ Eastern Division Agency Forester

Mike Reggear/ Southern Division Agency Forester