



Sierra Pacific Industries

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VIA Email: <https://www.fs.usda.gov/project/?project=58517>

March 28, 2022

Aaron Stockton
District Ranger
Naches Ranger District
10237 Hwy 12
Naches, WA 98937

Dear Aaron:

On behalf of Sierra Pacific Industries (SPI), thank you for the opportunity to provide Draft EA comments on the Little Naches Upland Restoration Project.

Sierra Pacific Industries is a family-owned company that owns sawmills and timberland in California, Oregon, and Washington State. We purchase timber from the Okanogan-Wenatchee National Forest to supply our sawmills and support jobs in the communities where we operate.

SPI supports the stated Purpose and Need for this project, and supports Alternative 2. We are members of the American Forest Resource Council (AFRC) which has been participating in the Little Naches Working Group (LNWG), and which is also reviewing the Draft EA documents. From those meetings, I know how important implementing beneficial treatments and needed restoration work across the landscape is to many stakeholders. It appears that there is unanimous support from the collaborative for this Project to move forward.

As you develop your final Plan for treating the Little Naches landscape, we offer these suggestions that we believe will strengthen the Project.

1. We believe it would be prudent to look for additional opportunities for commercial harvests in the Project Area. It appears the stands on the north side of Fawn Creek, the north side of Alder Creek, both sides of the south fork of the Little Naches River, and much of the Mathew Creek drainage in the northwest side of the Project area presents additional management opportunities. The Forest has outlined a considerable amount of service work

that needs to be done following harvest. This work can only be completed if the commercial treatments generate sufficient receipts. By putting more timber up for harvest, the Forest will receive more revenues to accomplish the restoration work as outlined.

2. SPI understands that the Forest Service must take necessary precautions to protect their resources. However, we believe that in many cases there are conditions that exist on the ground that are not consistent with the restrictions described in the EA's and the contracts. We would like to encourage a shift toward outcome-based rather than prescriptive restrictions. Examples include allowing feller bunchers or tethered systems to operate in skyline units in order to make the yarding more efficient. Under the right circumstances, this can reduce ground disturbance and decrease the number or cable yarding corridors necessary. Also focusing on soil moisture conditions rather than dates on the calendar provides more flexibility. In general, an outcome-based approach provides flexibility in operations and improves the viability of a project.
3. All of the commercial harvests will be done in the matrix lands. SPI encourages the Forest to use treatments that can successfully regenerate stands. Deferral of regeneration harvest over the past three decades has resulted in an unbalanced age-class distribution across the Forest, particularly on the Matrix allocation, and has left a void in stands in the 0-20 year age class. Regeneration harvests will also support and develop huckleberry plants which is one of the Purpose and Need for the Project. We also

Thank you for the opportunity to provide Draft EA comments on the Little Naches Upland Restoration Project. I look forward to following this Project through implementation, which will hopefully occur in this fiscal year.

Sincerely,



Matthew Leise
Division Log Procurement Manager
Sierra Pacific Industries
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