



VIA Email: comments-northern-nezperce@fs.fed.us

June 10, 2019

Chandra Neils, Supervisor's Office
Nez Perce-Clearwater National Forest
903 3rd Street
Kamiah, ID 83536

Dear Chandra:

On behalf of the American Forest Resource Council (AFRC) and its members, thank you for the opportunity to comment on the Gold Hill Project.

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. Many of our members have their operations in communities within and adjacent to the Nez Perce-Clearwater National Forest and management on these lands ultimately dictates not only the viability of their businesses, but also the economic health of the communities themselves.

The Gold Hill project is located on the Palouse Ranger district in Latah County, Idaho and encompasses about 2,100 acres of National Forest System lands. The project area is located primarily within the upper portion of the Gold Creek sub-watershed, with smaller portions occurring in the headwaters of the Big Creek sub-watershed, and the Meadow Creek sub-watershed. The project area is bordered by industrial timberlands, private timberlands, and Coeur d'Alene Tribal land.

AFRC and our members support the Need and Primary Objectives for this project which includes:

- Provide economic benefits to local communities and the public by providing marketable forest products.
- Address existing and potential future forest health issues including disease and risk of insect infestation.

- Reduce fuel loading to promote desirable fire behavior and reduce the potential for high intensity wildfire.

Further AFRC supports getting the stands in the project area into a desired condition by:

- Working to create a diverse and healthy forest landscape with forest cover types approaching pre-European settlement conditions. Western white pine, western larch, and ponderosa pine cover types would become more prevalent on the landscape and grand fir and Douglas-fir cover types would decrease in prevalence.
- Reduce incidence of insect and disease damage to allow for rapid recovery following disturbance.
- Create a balance of successional stages with 30 to 50 percent early-successional species, 20 to 40 percent young-mid-successional, 30 to 45 percent mature or mid-successional and 15 to 40 percent old forest. Appropriate old-growth stands have been identified and protected to meet established goals and provide habitat for old-growth dependent species.
- Work to improve degraded streams on existing developed areas.

In addition to supporting these aspects of the project, AFRC offers the following comments for you to consider as the project moves toward the development of an EA.

1. AFRC is very pleased to see that one of the primary needs of the project is to provide economic benefits to local communities and the forest products industry. The National Forests in Idaho are very important for providing the raw materials that sawmills within the state need to operate. The timber products provided by the Forest Service are crucial to the health of our membership. Without the raw material sold by the Forest Service these mills would be unable to produce the amount of wood products that the citizens of this country demand. Without this material, our members would also be unable to run their mills at capacities that keep their employees working, which is crucial to the health of the communities that they operate in. These benefits can only be realized if the Forest Service sells their timber products through sales that are economically viable. This viability is tied to both the volume and type of timber products sold and the manner in which these products are permitted to be delivered from the forest to the mills. There are many ways to design a timber sale that allows a purchaser the ability to deliver logs to their mill in an efficient manner while also adhering to the necessary practices that are designed to protect the environmental resources present on Forest Service forestland. Studies by the University of Idaho have shown that as many as 18 direct and indirect jobs are created for every million board feet of timber that is harvested. If the Project yields 8-10 mmbf, this will help to provide needed raw materials for the local mills and as well as steady jobs.
2. AFRC supports the Forest in treating 865 acres of the total 2,100 acre project area during this operation. Since this is such an isolated piece of the Palouse Ranger District it makes sense to treat a good portion of the area with this entry. Further given the conditions of the stands the use of regeneration harvest seems the best silvicultural treatment for this area.

3. In the project design features SR-2, ground skidding will be limited to 35%. AFRC asks the Forest to consider ground skidding on slopes over 35% especially if newer equipment and techniques are available. In many areas tethered logging techniques are being used on slopes well over 35% with less impact to soil and other resources.
4. AFRC supports the creation of openings that exceed 40 acres. Larger openings are allowed if the Forest receives Regional Forester approval and the public is given a 60 day notice. This tool is needed to effectively address the forest health issues found in the project area.
5. AFRC supports the construction of approximately ten miles of temporary roads to facilitate vegetation treatments (approximately three miles of temporary roads would occur on existing road prisms). However, we ask the Forest to make a review to see if some of these roads may be needed in the near term for access for fire, recreation or further management before they are obliterated.
6. There are many ways to design a timber sale that allows a purchaser the ability to deliver logs to their mill in an efficient manner while also adhering to the necessary practices that are designed to protect the environmental resources present on Forest Service forestland. When discussing the winter logging criteria AFRC would like the Forest Service to shift their methods for protecting resources from that of firm prescriptive restrictions to one that focuses on descriptive end-results; in other words, describe what you would like the end result to be rather than prescribing how to get there.
7. AFRC supports analyzing this project using an EA. There are no significant impact being created by this action that would warrant an EIS.

Thank you for the opportunity to provide comments on the Gold Hill Project. I look forward to following the implementation of this project as it moves forward toward a Draft EA.

Sincerely,



Tom Partin
AFRC Consultant
P.O. Box 1934
Lake Oswego, Oregon 97035