AMERICAN FOREST RESOURCE COUNCIL

October 30, 2018

Yewah Lau
District Ranger
Hood Canal Ranger District
Olympic National Forest
1835 Black Lake Blvd. SW
Olympia, WA 98512

c/o Kim Crider

**In Reply to:** Wynoochee Restoration and Road Management Project

Dear Ms. Lau:

The American Forest Resource Council (AFRC) submits the following comments for scoping for the proposed Wynoochee Restoration and Road Management Project

AFRC represents the forest products industry throughout Oregon, Washington, Idaho, Montana, and California. AFRC's members include over 50 forest product businesses and forest landowners. AFRC's mission 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 adjacent to the Olympic National Forest (ONF), and the management on these lands ultimately dictates not only the viability of their businesses, but also the economic health of the communities themselves. The forest products sector in Washington State continues to provide around 40,000 direct and about 100,000 indirect jobs. Many of these are found in rural communities like those on the Olympic Peninsula. In addition to the wages paid, the taxes and other monetary transactions generated by these businesses and family-wage jobs, contribute to the infrastructure and well-being of the local communities. AFRC submits these comments on behalf of its members.

Lack of supply of raw materials to fill manufacturing demands for wood products continues to be an issue in Washington, particularly on the North Olympic Peninsula. Several mills have closed in the past few years, including one in the nearby vicinity of this project. Mills that very likely would have sourced some of their logs from this project area. Vegetation management projects, both current and future, on the ONF can help contribute to the wood supply in Washington that many mills depend on to continue operation and employment of their work force.

**Purpose and Need**

As described in the Scoping Notice a significant portion of the planning area has "been influenced by past logging activities." This has led to, as described in the Scoping Notice; "relatively dense second growth plantations in a structurally simplified stage." Vegetation management projects are a good

924 Capitol Way South, Suite 102 • Olympia, Washington 98501
**Tel.** 360.352.3910 • **Fax:** 360.352.3917

method to modifying this simple structure and accelerate the development of late successional characteristics.

AFRC would encourage the Forest to evaluate maximizing the acres commercially treated through this proposal. This includes both LSR and AMA. Particularly targeting LSR stands in excess of age 60 for treatment prior to reaching age 80. Prescriptions developed for the LSR stands should take into account the need for treatment of a broad range of tree sizes and consider opportunities to include some trees in excess of 20-inch DBH. Prescriptions in the AMA portions of the project area should also be developed with the expectation to explore the "development, demonstration, and testing of techniques that emphasize restoration of late-successional forest conditions and riparian zones, and that integrate commercial timber harvest with ecological objectives." These should be unique techniques beyond the traditional variable density thinning prescriptions typically applied.

**Proposed Action**

The project proposal identifies 5,044 acres of commercial treatment using variable density thinning in this project. However, this is not entirely accurate as displayed in "Table 1: Summary of acres proposed for restoration thinning by logging system." Table 1 identifies logging systems and the acres associated with each. A "Skip" is not a logging system but rather a portion of a variable density thinning prescription where no activity occurs. While breaking out the "skip" acres in the footprint of the project helps provide clarity we would suggest subtotaling the actual acres operated on by logging system and then adding in the "skip" acres to the total footprint of the project polygons.

Considering the management history and existing conditions of this area we feel there may be opportunities to treat additional acres beyond those proposed. As the project progresses additional information regarding the treatment needs of other second growth stands in the planning area would be appropriate. With the significant number of miles of decommissioning proposed in this project, many of these stands appear to become inaccessible. An explanation on why they do not need treatment now and also a description of the plan to access these stands in the future for treatment would be beneficial. Increasing the number of acres proposed for treatment can help the ONF develop "Approved NEPA shelf stock" for future projects and provide for a more cost effective NEPA process. This has been accomplished or is in process on several Forests in Region 6. Additionally, increasing the acres treated supports all or portions of each of the identified "Purposes" 1 through 5.

A key aspect to meeting Objective 3 of the Proposed Action, and in reality, the ability to meet all of the Objectives, is that treatments are economically viable. This can be achieved through appropriate treatment prescriptions, the selection of appropriate harvest systems, and types of road classifications (temporary/permanent) for roads used to access harvest units. As analysis and finalization of the Proposed Action move forward we would ask you consider these issues, in order to increase the project's overall economic viability.

AFRC is extremely concerned over the level of proposed road decommissioning and conversion of roads to Maintenance Level 1 – Closed. Table 2 in the project proposal appears to have an error in both the "Proposed for ML1 Closure" and "Proposed ML2" columns. The Total miles identified is listed as 39 and 21 respectively. For proposed ML1 however the table shows 45 miles reduced from ML2 to ML1 and 41 miles of ML1 remaining ML1. This would imply a total of 86 miles of ML1 in the proposed action.

Additionally, there is 39 miles proposed to stay ML2 and 19 miles proposed to change from ML3 to ML2. This would appear to create a total of 58 miles of ML2 roads.

Currently approximately 41% of the roads in the planning area are in ML 1 – Closed status. This proposal would bring the total number of miles of road closed to motorized access to approximately 68% of the total roads in the planning area. We have summarized the road status in the table below:

| Proposed Road Status | Miles | % of Total Miles | Total Miles Closed to Motorized Access | % of Total Miles closed to Motorized Access |
|---|---|---|---|---|
| Convert to Trail | 1.8 | 0.8% | **155.8** | **68.4%** |
| Decommissioned | 68 | 29.9% | | |
| ML - 1 | 86 | 37.8% | | |
| ML - 2 | 58 | 25.5% | | |
| ML - 3 | 11 | 4.8% | | |
| ML - 4 | 3 | 1.3% | | |
| **Total** | **227.8** | **100.0%** | | |

Removing access to the significant number of acres of AMA allocations as well as eliminating access to rock sources needed for ongoing road maintenance is of concern. Because the Olympic National Forest does not have any Matrix land allocation, the AMA allocation is the sole opportunity for long-term sustainability for logging and milling infrastructure as well as timber dependent communities. Minimizing the loss of access both in the near term and the long-term can serve to provide ongoing sustainability of the local economies. Reducing access to rock sources on Forest Service ground will increase road management costs. Maintaining access to this critical resource is needed for current and future road maintenance needs.

The planning area is a high recreation use area, especially during late spring to early fall. The significant increase in roads closed to motorized traffic will reduce recreation opportunities for those seeking or requiring the use of motorized travel to recreate on the Forest. Further it will focus this recreation traffic onto a smaller footprint of the planning area. This densification of use will increase maintenance costs over time and more trips are conducted on a given mile of road, thus requiring additional road maintenance work.

Reducing motorized access to the Forest in this planning area will undermine the ability of the Forest to attain Purpose 3: “Contribute to the economic viability of local communities.” Reduction in access for vegetation management and recreation will serve to harm the local communities who depend on both timber management and recreation to support their economies.

We encourage the Forest to review the proposed decommissioning and road closure in regards to the economic impacts to the motorized user of the planning area.

It is unclear under the “Temporary Roads” segment of the project description if the approximate 7 miles of reconstruction and decommissioning are old system roads or if these are non-system roads being used for this project. Further clarification on this matter would be helpful in our analysis of this proposal.

Some additional details for consideration:

- **Prescriptions:**
  - Removal of low volumes per acre in thinning operations can lead to harvest costs outweighing the value of the timber removed, particularly as the logging systems costs increase (ground vs. cable vs. helicopter).
  - Wider spacing of the residual stems in thinning can aid in both operational efficiency and also the safety of crews working on the ground, cable and helicopter logging systems.
    - Downhill cable yarding increases costs and risk of residual stem damage. Increasing spacing of residual trees by removing greater volume in these stands can enhance economic viability of the project.
  - Consider opportunities to include hardwood removals where appropriate, including road daylighting. This can help support Item 3 of the proposed action by helping to maintain the infrastructure of hardwood processors.
    - Expanded treatment prescriptions in AMA could evaluate hardwood removals in development of forest structure.

- **Riparian Reserves**
  - AFRC would encourage the ONF to undertake evaluation and propose treatments within the Riparian Reserves (RRs). Efforts to manage within these areas serve to reach two of the goals of the project. First, the treatments accelerate plantation stands towards a desired future condition (DFC). Since many of these stands are in a structurally simple state with the riparian reserves, treatments within them will assist in the attainment of DFC. Additionally, by conducting commercial activities through thinning in RRs the economic benefits of the Purpose and Need will also be supported. As support of this activity we would suggest the Forest review the work of Deanna (Dede) Olson recently released in October of 2015. A Forest Service report can be found at this link: http://www.fs.fed.us/pnw/sciencef/scifi178.pdf.
  - We would also offer the following information for use as support of these treatments or in future projects:

    - Rashin, E., C. Clishe, A. Loch and J. Bell. 2006. Effectiveness of timber harvest practices for controlling sediment related water quality impacts. Journal of the American Water Resources Association. Paper No. 01162

    - Naiman, R.J., E.V. Balian, K. K. Bartz, R. E. Bilby, and J. J. Latterell. 2002. Dead wood dynamics in stream ecosystems. USDA/Forest Service PSW-General Technical Report-181

    - McDade, M. H. Swanson, F. J.; McKee, W. A.; Franklin, J. F.; Van Sickle, J. 1990. Source distances for coarse woody debris entering small streams in western Oregon and Washington. Canadian Journal of Forest Research 20: 326-330.

    - Dolloff, C.A., and M.L. Warren, Jr. 2003. Fish Relationships with Wood in Small Streams. Pages 179-194 in S. V. Gregory, K. L. Boyer, and A. M. Gurnell, Editors. The Ecology and Management of Wood in World Rivers. American Fisheries Society, Symposium 37, Bethesda, Maryland.

    - Minor, K. P. 1997. Estimating large woody debris recruitment from adjacent riparian areas. Master's thesis, Oregon State University

- Welty, J. W., T. Beechie, K. Sullivan, D. M. Hyink, R. E. Bilby, C. Andrus, and G. Pess. 2002. Riparian Aquatic Interaction Simulator (RAIS): a model of riparian forest dynamics for the generation of large woody debris and shade. Forest Ecology and Management 162:299-318

- Keim, R.F., A.E. Skaugset, and D.S. Bateman. 2002. Physical aquatic habitat II, pools and cover affected by large woody debris in three western Oregon streams. North American Journal of Fisheries Management 22:151-164


- **Harvest Systems:**
  - Selection of the appropriate harvest systems for the economic need of specific units.
  - Maximizing opportunities for mechanical harvesting and yarding can enhance economic viability.
    - This includes consideration for expanding ground-based operations beyond the slope limitations typically set for these logging systems.
    - The use of tethered logging systems for both cutting and yarding should be evaluated in the Environmental Analysis.
  - Seasonal timing restrictions, particularly in the case of helicopter operations, can create economic challenges to a successful project. Expanding operating windows to the maximum as practically allowed, including options for winter operations, should be evaluated. Other Forests within Region 6, including West Side Forests, are implementing and evaluating opportunities to expand operating windows. These include more outcome-based constraints as compared to prescriptive.
  - Selection of prescriptions and residual stem spacing appropriate for the type of harvesting.
    - Downhill yarding in a thinning will be less expensive and should have less residual stem damage with a wider spacing.
  - Fixed "move in costs" spread over a smaller volume could mean the difference between success and failure of a project from an economic viewpoint.

- **Roads**:
  - Roads are an important part of the infrastructure providing access to the forest for a variety of stakeholder uses including forest management and recreation needs.
  - Opportunities to invest in this infrastructure through the maintenance and improvement of systems roads should be evaluated and appears to be part of the Proposed Action. This maintenance can lead to reduction and elimination of potential sediment delivery sources. It also has the potential to allow the Forest to examine opportunities for expanded operating windows, including winter operations.
  - The use of new temporary roads and existing non-system roads will help to reduce logging costs. When BMPs are used, these roads can be relatively low standard roads and then decommissioned as planned.
  - AFRC is hopeful the Forest will include the analysis of rock pit expansion and development of Forest Service rock resources. This has the potential to reduce operational costs and improve economic viability of future sales and road maintenance.

AFRC supports the use of an EA rather than an EIS for this project. An EA is more than sufficient to analyze potential environmental impacts. The project is not precedential as it implements routine prescriptions applied to green timber stands. The treatments are well within the limits prescribed by the Northwest Forest Plan. This project does not have a significant impact on the environment.

Thank you for the opportunity to comment on this project. We look forward to participating in the further development of this proposal. Should you have any questions regarding the above comments or would like additional information, please contact me at 360-352-3910 or mcomisky@amforest.org.

Sincerely,

Matt Comisky
Washington State Manager
American Forest Resource Council