

HIGH CASCADE, INC.

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October 6th, 2021

Ms. Erin Black, District Ranger
Gifford Pinchot National Forest
Mt. Adams Ranger District
2455 HWY 141
Trout Lake, WA 98650

RE: OBJECTION Upper Wind Vegetation Management Project Environmental Assessment (EA)

Pursuant to 36 C.F.R., Part 218, High Cascade, Inc. files this objection to the proposed draft decision for the Upper Wind Vegetation Management Project. Mt. Adams District Ranger Erin Black is the responsible official. The project occurs on the Mt. Adams Ranger District on the Gifford Pinchot National Forest

Objector

High Cascade, Inc.
P.O. Box 415
Carson, WA 98610

High Cascade, Inc. and our affiliates are a small family-owned community minded business located in the heart of the Cascades, producing family wage jobs, as well as high quality wood products shipped locally, regionally, and worldwide.

Together with our affiliates, we employ 200 + full-time employees, and we are one of the largest purchasers of Region 6 timber. Our mills and contractors rely on a sustainable flow of USFS timber for day-to-day operations.

Objectors Designated Representative

Jon Paul Anderson
P.O. Box 415
Carson, WA 98610
jpanderson@wkoinc.com

Reasons for the Objection

The objections are based upon prior written comment submitted by High Cascade, Inc. in response to the Scoping Notice and review of the Draft EA which are shown below.

The proposed Modified Alternative fails to address the current and future needs in the project area to meet area to meet the Purpose and Need.

The Purpose and Need as it appears in the Final EA includes the following:

“Create complex early seral habitat on a contiguous block of habitat to provide conditions for those species that require early seral conditions”

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“Restore or improve the condition of special vegetative habitats such as meadows or huckleberry patches”

“Provide and sustain jobs and other associated economic benefits of wood products to the local community”

In High Cascade’s opinion, the USFS should strive to meet the goals of the original Scoping Letter in which the USFS would perform early seral habitat creation on approximately 600 acres within the project area, containing roughly 152 acres of timber over the age of 120 years old. High Cascade, Inc. also objects to the decommissioning of forest roads within the matrix land allocation or any roads within LSR that lead to matrix land allocations.

In our Scoping and Draft EA Comments, as well as in our participation in the South Gifford Pinchot Collaborative Group we have expressed our support and emphasized the importance of large early seral habitat creation, riparian management, and the management of timber over the age of 80 years old, especially on Matrix land allocations. By deleting the creation of early seral habitat from stands 120 years old and up, you lose many of the complex structure components that are not present in the 25-50 year old plantations, i.e., Large down woody debris, larger diameter snags, vertical structure, plant diversity. Loss of the complexity within the early seral units goes against every Purpose and Need statement above.

According to the Upper Wind Stand Details, 2/3 or 4.16 mmbf of timber initially planned in the regeneration cut area will be unavailable for harvest due to this decision. The volume is important for creating and sustaining jobs, as approximately 11 direct jobs are created for every 1 mmbf of timber harvested ($4.16 \text{ mmbf} \times 11 = 45 \text{ jobs}$). Because these units were regeneration cuts with ground-based logging, additional stumpage value would have been realized due to logging efficiencies and larger wood. The Washington Department of Revenue reports that from January 1st, 2021, to June 30th, 2021, the average stumpage return for this area was \$465/mbf for Douglas fir and \$255/mbf for hemlock. Assuming a 50/50 mix of Douglas fir and hemlock, the USFS would see a loss of approximately \$360/mbf or \$1,497,600 in additional stumpage.

Currently the watershed has about 6% of its land base in early seral habitat, as compared to 28% in the 1850’s. This includes the recent addition of the early seral habitat created by the Big Hollow Fire. The Big Hollow Fire’s early seral habitat is many miles to the

southeast from the proposed early seral creation. Early seral is lacking within this area and it is adjacent to wilderness where no vegetation management will ever take place.

With the very rigid side boards that framed this project from the very beginning, it is disappointing to see that so much has been lost. High Cascade, Inc. has been involved from the beginning with participation on the South Gifford Pinchot Collaborative Group and the Zones of Agreement Sub-committee. It is of our opinion that the decision made to drop older stand units is not a reflection of the Collaboratives views, but that of one or two organizations within the group. As you know the ZOA proposed a compromise with Cascade Forest Conservancy to harvest about half of the older stands, but when presented to the larger group, the larger group wanted it all included in the final decision.

Providing a predictable and sustainable supply of wood to local mills is dependent on a developed road system. Road decommissioning forecloses on opportunities for future logging, recreation opportunities, and fire suppression. The forest is an ever-changing mosaic and future needs is not always clear. The old 3056 road accessing stands 802262 and 802265 was decommissioned in a decision made by Nancy Ryke in June of 2010. Many commentators opposed the decommissioning, citing future needs for logging, recreation, and fire suppression. In the decision it was said "very few acres of land accessed by these roads would be ready for harvest in the next round of timber sales in the Wind River Watershed". Currently there are 88 acres proposed now, and according to the 2010 analysis more in 2030 and beyond. This decommissioning has forced the UFSF to use a much more costly helicopter logging method. It is estimated that helicopter logging over traditional logging is adding an estimated cost of more than \$265,000 to the harvest of those units. Looking to the future, helicopter logging in 2030 and beyond will lead to additional expenses that would have exceeded initial repair estimates (\$325,051, as stated in the 2010 decision) and the road would have stayed on the landscape for decades to come provided recreation, timber, and fire management opportunities.

Resolution Requested

High Cascade, Inc. requests that the Deciding Officer include the regeneration stands over 120 years of age that had been dropped in the Final EA as well as change all roads from decommission to closure.

Request for a Resolution Meeting

Pursuant to 36 C.F.R. Part 218, the objectors request to meet with the reviewing officers to discuss the issues raised in this objection and potential resolution. In the event multiple objections are filed on this decision, High Cascade, Inc. respectfully requests that the resolution meeting be held with all objectors present. High Cascade Inc. believes that having all objectors together at one time perhaps will be a more expeditious process to either resolve appeal issues or move the process along. As you know, 36 C.F.R. part 218 gives the Reviewing Officer considerable discretion as to the form of the resolution

meetings. High Cascade, Inc. requests to participate to the maximum extent practicable, and specifically requests to be able to comment on points made by other objectors during the objection resolution meeting.

Thank you for your attention to this matter and High Cascade, Inc. looks forward to the resolution meeting.

Sincerely,

A handwritten signature in black ink, appearing to read 'Garret Stump', written over a horizontal line.

Garret Stump
President