



Pinchot Partners

FOREST COLLABORATIVE

November 29, 2023
District Ranger Theresa Tanner
Cowlitz Valley Ranger District
P.O. Box 670
Randle, WA 98377

ATTN: Yellowjacket Revised Draft Environmental Assessment

Thank you for the opportunity to respond to the revised Environmental Assessment (EA) for the Yellowjacket Restoration Project. The Cowlitz Valley Ranger District (CVRD) staff has spent significant time interacting with the Partners in meetings and field trips throughout the Yellowjacket planning process. We greatly appreciate and value this interaction.

Proposed Actions of the Yellowjacket Project as noted in the request for comments:

- Low intensity thinning of overstocked tree stands to optimize diameter growth, live crown ratio and reduce volume loss to mortality;
- High intensity thinning of overstocked tree stands to maximize individual tree diameter and crown growth and accelerate the development of old-growth characteristics;
- Huckleberry enhancement to maximize berry production;
- Regeneration harvest to provide local job opportunities, generate funds from a commercial timber sale, and provide early seral, open stand conditions.
- Creating snags and augmenting instream wood;
- Beetree Pond restoration and beaver dam analogs;
- Improving road conditions and access;
- Closing & stabilizing roads;
- Decommissioning roads;
- Rerouting approximately 0.65 miles of FR 2801 away from the Cispus River floodplain;
- Redesigning North Fork Campground to address safety issues caused by root rot and improve campsites and access;
- Removal of multi-use designation of approximately 58 miles of FR 22, 23, and 55 for OHV use from proposed action.

For each objective, we summarize our “Zones of Agreement” (ZOA) around topics we have already discussed in our broader ZOA document. Where there is a range of views, we will utilize these documents and the discussions that led to it as we continue to develop a broader document that may be helpful to the CVRD planning team in the future.

In general, we'd like to reiterate the importance of early, ongoing involvement in the planning process. As stated in the [Timber Sales](#) section of our ZOA:

"Currently, at least one representative of the Pinchot Partners attends monthly Forest Service interdisciplinary team meetings as a guest observer. We are grateful for this invitation, and request that it continues. To increase future success, we also request early and often communication from Forest Service staff on what types of sales are being considered for particular projects. The Partners would like the opportunity to meet with the timber program and pre-sales foresters on a biennial basis or as appropriate to give feedback on sale areas & boundaries as those decisions are made. We would also like the ability to suggest project ideas and provide feedback as to the viability of stewardship items and GNA-program revenue projects to ensure proposal feasibility and cost efficiency."

We support **thinning overstocked, dense tree stands** for the reasons below:

- Economically beneficial for local forest communities and maintains current forest product infrastructure, an integral part of restoration thinning .
- Ecologically, previous plantations are not functioning or at risk of not functioning, with low levels of structural and species diversity, resulting in a threat to wildlife and aquatic habitat .
- Will promote tree growth and increase structural diversity, while increasing light to the forest floor which will promote greater species diversity.
- Accelerating growth achieves Aquatic Conservation Strategy (ACS) guidelines.
- Allows understory growth and habitat that benefits a variety of wildlife species.
- Enhances opportunities for collection and/or harvest of specialty forest products.
- Improves forest aesthetics.

Areas of concern with commercial thinning include slope stability and distance of riparian buffers, addressed in another section below. We understand that potentially unstable soils and/or areas near aquatic features are classified as "riparian reserves" in the Northwest Forest Plan (NWFP). We understand that "potentially unstable" is a classification broadly drawn from the Soils Resource Plan. Additional concerns regarding maintaining protecting water quality and local microclimates within the riparian reserves were discussed, however the group could not come to consensus on future mitigation needs. One member also raised concerns over thinning trees over 35" DBH, noting the importance of larger, older trees on the landscape, though no consensus was reached on size limitations.

Huckleberry restoration to maximize berry production;

There is broad agreement that huckleberry enhancement activities are beneficial. We applaud the Forest Service for including huckleberry restoration activities in this proposal. We agree it is beneficial for several reasons:

- It opens up the area, providing early seral habitat for wildlife species.
- Huckleberries have significant cultural value.
- They also have economic value for commercial and recreational pickers.
- Enhancement improves the availability of berries.

- Enhancement is also beneficial to multiple plant and animal species.

However, we did not come to an agreement on the level of canopy cover in the prescription that should be retained/removed to benefit huckleberry productivity. While the Partners have been actively engaged in monitoring huckleberry restoration sites, we do not yet have the long term data to support a robust discussion on this topic. Therefore, we suggest reviewing and utilizing ongoing monitoring and GIS field research in the Huckleberry Restoration Management Strategy to determine a canopy cover level that is most beneficial to improving huckleberry productivity.

A member also commented on the concern over the size of huckleberry treatment units, however the group did not agree to what an appropriately sized unit should be. In order to extend the longevity of the openings, we recommend the use of fire, post-harvest, in all areas where possible.

Regeneration harvest to create complex early seral habitat:

A majority of Pinchot Partners agree broadly that complex early seral:

- Creates diversity,
- Develops a mosaic on the landscape increases early seral habitat across the forest;
- Creates a continuum of habitat types that includes meadows and clearings,
- Potential where older stands do not exhibit old growth characteristics and will not develop them,
- Economically beneficial for local forest communities and maintains current forest product infrastructure.

However, we did not reach full consensus about creating complex early seral for the following reasons:

- Because the scale of need for early seral decreases over time as wildfires increase the amount of this habitat type Use of regeneration harvest on mature, naturally regenerated stands that have the potential to develop into old growth sooner than young forest.

Guidance for opening sizes should be consistent with the Gifford Pinchot Forest Land and Resource Management Plan. If treatments proposed do not follow this guidance, we would need to understand the purpose and a plan amendment would be necessary. An additional concern noted by one member regarding the potential impacts to Northern Spotted Owls, fishers, and other plant and animal species that are sensitive to habitat impacts when using regeneration harvest to create early seral habitat. However, the group proposed that individual comments provide further detail on unit specific concerns.

Snags and augmentation of instream wood

There is broad support for creating down wood and snags where appropriate within this project. We suggest that where possible, this activity be conducted during other harvest activities to reduce operation costs and the need to mobilize multiple entries to accomplish the work. However, the District may should also consider

implementing this work through a service contract, supplemented with Bipartisan Infrastructure Law (BIL) or Inflation Reduction Act (IRA) funds, or as a paid stewardship item, so that the cost of treatment does not fall on the timber sale purchaser. Doing so would likely bring more bidders to the table for timber sales offered.

Beetree Pond restoration

We have complete agreement that it would be beneficial to restore the Beetree pond by installing beaver dam analogs.

Improving road conditions and access

As stated in the [Forest Road Management](#) section of our ZOA document, we support efforts to preserve road benefits such as:

- Access to timber and special forest products that help support local economies and fund restoration activities
- Recreation opportunities for local residents and tourists
- Fire control, emergency response, and forest management activities (p.10).

Decommissioning Roads

We believe that road decommissioning should be focused on roads that have adverse environmental impacts and limited access needs. Criteria to consider for road decommissioning:

- Watershed risk
- Identified uses and reasonably foreseeable future management or need
- Recreation access value

Decommissioning can include:

- Eliminating the road from the GPNF database of system roads because the road has effectively closed itself and is no longer needed in the future
- Pulling and or upgrading culverts and stabilizing aquatic and terrestrial risks with entrance closure
- Full topographic restoration, where cost benefit analysis makes it a reasonable expense ([Forest Road Management ZOA](#)). Road decommissioning is an excellent candidate for retained receipts, consider supplementing full topographic restoration with outside funds, so the purchaser does not bear the cost.

Closing and Stabilizing Roads

Closing and stabilizing roads should be focused on roads not needed for current use and management of Forest Service lands, but may be needed in the foreseeable future. We recommend that for any road closure, a stub of closed road remains available (20-30') for parking and dispersed camping. Criteria to consider for closing and stabilizing:

- Watershed risk
- Recreation access value

- Identified uses within the foreseeable future

Closing and stabilizing can include:

- Blocking vehicular traffic
- Comprehensive watershed restoration

Road work is often the most costly part of a timber sale package, consider supplementing road work costs using available funds including those from the BIL, IRA, retained receipts, Good Neighbor Authority (GNA), Regional Office, Legacy Roads and Trails and other federal funds, such as Emergency Response for Federally Owned Roads (ERFO).

Rerouting approximately 0.65 miles of FR 2801 away from the Cispus River floodplain;

As stated in the [Forest Road Management](#) section of our ZOA document, we support efforts to prevent or reduce impacts such as:

- Degraded water quality and aquatic habitat from sedimentation, debris slides, clogged culverts, etc.
- Habitat fragmentation which can decrease biodiversity and increase predation
- Dispersal of invasive species, pathogens, and chemicals.

North Fork Campground Redesign

With growing demand on campgrounds, trail systems, and forest resources as a whole, more significant time & resources are required for appropriate management & maintenance of these areas. As noted in our recently approved [Recreation](#) ZOA the Partners broadly support the updating and addition of bathroom facilities. The Partners also find consensus in supporting proposed actions to address areas of root rot within North Fork Campground and provide additional camping access through yurt and appropriately-sized RV sites, which in our view, will assist in easing the burden of recreational use.

Removal of Mixed-Use Designation of FR 55, FR 22, and FR 23

The Partners previously discussed the proposed two-loop travel route for off-highway vehicles (OHV) and some members had concerns that the absence of a plan for education and enforcement of OHV use, as well as the absence of a full analysis of transportation and parking needs, could cause unnecessary resource impacts and conflict among user groups. The Partners support removal of this activity on the updated draft EA and would be interested to discuss any future analysis outside the scope of this document's updated purpose and need.

For Additional Consideration: Treatments within Riparian Reserve

Past harvest practices have left many riparian areas in a structurally simple state. Thinning in riparian areas can accelerate the stand's trajectory to produce large

conifers and has minimal effect on stream temperature with reasonable buffers. The Partners have long advocated for active management of the Riparian Reserves, particularly in over-stocked plantations.

The group has come to consensus on applying Option B from Reeves et al. 2016, which suggests support for more active management of the Riparian Reserves of plantation stands. As stated in our Silvicultural Management within Riparian Reserves ZOA, the collaborative supports the site-specific approach (Option B) and would like to see the FS use this methodology in this project to address the structure and complexity of riparian areas in overstocked plantation stands.

We could not come to agreement on exactly how large the inner Riparian Reserve Zone should be. Some members believe they are too large in the proposal for the following reasons:

- The original findings that were incorporated into the NWFP suggest that most ecological functions could be maintained by reserves equal to or less than the distance of one site-potential tree-height. The functions include beneficial effects of root strength for bank stability, litterfall, shading to moderate water temperatures, and delivery of coarse wood to streams. Recent studies suggest that many of these ecological functions are maintained at shorter distances than was initially suggested in the FEMAT analysis (Brososke et al. 1997, Welty et al. 2002, Gregory et al. 2003, Rykken et al. 2007, Spies et al. 2013, Anderson and Poage, 2014).
- The no-harvest buffers proposed represent significant increases that: (1) would remove an important source of funding (stewardship sale retained receipts) that are regularly applied to address road-related fish and aquatic resource impacts; (2) would significantly impact the operability of forest health treatments that are needed to achieve Aquatic Conservation Strategy goals in many Riparian Reserves; (3) would have significant economic impacts on rural communities; (4) are not substantiated by robust scientific literature compared to previous agency consultation agreements

For future planning areas, this is a great example of a topic that the Partners would like to discuss in detail with relevant specialists early on and throughout the planning process. Conversations around treatments within Riparian Reserves as well as buffer widths can be contentious; digging into the details of what the district has planned early on will give us the time to have these nuanced discussions and provide more useful project and/or site-specific feedback.

For Additional Consideration: Visual Resource Impacts, Logging Technology, Innovation in Markets, & Socioeconomic Factors

For visual resource impacts, we would like to further discuss how the Partners may assist with public outreach to ensure the need for and benefits of this project are well understood. From our previous comments on the draft Kraus Ridge EA we would like additional consideration of how short term visual impacts lead to a long term restored 'natural' forest setting, as opposed to creating design features that aim to hide visual resource impacts.

We would like to encourage the Forest Service to review tethered logging technology as an option for this planning area, and future planning areas. We submit the following research for CVRD consideration: *Insight into the Productivity, Cost and Soil Impacts of Cable-assisted Harvester-forwarder Thinning in Western Oregon* by Green 2008, et al¹.

We also would like to encourage innovation in markets, such as allowing up to certain percentages of slash to be removed from timber harvest areas, or secondary or tertiary markets associated with forest planning activities.

In our previous comment letter, we encouraged including a **purpose** of sustaining the health and economic well-being of people and a **need** for forest products via a sustainable timber supply that will help maintain the stability of local and regional economies, and contribute valuable resources to the national economy, on a predictable and long-term basis. We appreciate and thank district leadership for the inclusion of commercial timber harvest with the explicit need to provide local jobs and ensure rural economic development. A focused socioeconomic purpose and need is essential to ensure proper alignment with and full realization of intended outcomes of the NWFP. Existing mill infrastructure depends greatly on the availability of raw material from projects like this.

Placing an emphasis on economics in the defined purpose and need sends a strong signal of the importance of the existing and potential future local and regional manufacturing facilities, along with the forest health contractors that will be supporting and performing watershed and forest health treatments on the ground. We also request that the CRVD meet with the Partners to discuss potential sale typing in the planning area, to include both GNA and stewardship sales, as well as discuss any economic pitfalls prior to a bid package being offered. This will ensure that the sale offered is economically viable, so that bidders will be at the bid table upon offer.

The Pinchot Partners hope that the information provided in this letter will aid our Forest Service partners in completing the Yellowjacket EA. Please let us know if there is anything else we can provide that will help bring this analysis to completion so that implementation of this important restoration work may begin.

Thank you for your consideration,

A handwritten signature in black ink, appearing to read "John O'Brien", written in a cursive style.

John O'Brien
Chair, Pinchot Partners Board

¹ <https://doi.org/10.1093/forsci/fx049>