



March 25, 2024

Johanna Kovarik, Forest Supervisor  
ATTN: Objection – Yellowjacket Project  
987 McClellan Rd.  
Vancouver, WA 98661

RE: Yellowjacket Project Objection

Pursuant to 36 C.F.R. Part 218.7, the American Forest Resource Council files this objection to the proposed draft decision for the Yellow Jacket Project. The Yellow Jacket project occurs on the Cowlitz Valley Ranger District on the Gifford Pinchot National Forest.

**Objector:**

American Forest Resource Council  
700 NE Multnomah, Suite 320  
Portland, Oregon 97232  
(503) 222-9505

AFRC is an Oregon nonprofit corporation that represents the forest products industry throughout Oregon, Washington, Idaho, Montana, California, and Nevada. AFRC represents 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 the protection of all forest lands. The Yellow Jacket project will, if properly implemented, benefit AFRC's members and help ensure a reliable supply of public timber in an area where the commodity is greatly needed.

**Objector's Designated Representative:**

Matt Comisky, Washington Manager  
924 Capitol Way South; Suite 102  
Olympia, WA 98501  
360-352-3910  
mcomisky@amforest.org

The content of this objection below is based upon the prior specific written comments submitted by AFRC in response to the Revised Draft EA which are hereby incorporated by reference.

**1. The rationale provided to justify the change in use of portions of the previously decommissioned Forest Roads 2810-051 and 052 and the potential implications of treatments occurring on identified units.**

The Purpose and Need in the EA that applies to commercial timber treatments: *Commercial timber production – There is a need to provide local job opportunities and to support rural economic development.*

The Draft Decision Notice states:

*After considering comments received regarding soil stability in this area, the number of water crossings and past agency efforts to decommission these roads to promote watershed health, and after my subsequent discussions with my specialists, I have determined that there is uncertainty regarding the possible effects to the environment from this reconstruction. As a result, I am authorizing only improvements or reconstruction of the first 0.3 mile of Forest Road 2810-051. Units 104, 107, 108, 109, 110, 111, 112 and 113 will still be included in the project area with the same prescription, but for helicopter harvest only. This will meet the purpose and need without the environmental uncertainty. Unit 105 will remain ground-based, as it is accessed via the first 0.3 mile of road.*

AFRC submitted written comments in response to the Revised Draft EA and addressed our concerns with low-intensity thinning on Matrix lands. Additionally, we highlighted concerns over the need for the economic viability of treatments so that the Yellow Jacket project could meet the Purpose and Need by meeting the commercial timber production goal.

Low-intensity thinning volume, coupled with limited operating season restrictions, and the use of helicopter thinning, can quickly turn an economically viable cable or ground-based project into an uneconomical non-viable project. The stands listed above (Units 104, 107, 108, 109, 110, 111, 112, and 113) are identified in Table 6 of the Revised EA as low-intensity thinning in Matrix land allocations.

**Resolution Requested:**

AFRC requests that the Deciding Official clarify the rationale for the limitation of use of Forest Roads 2810-051 and 052, and the analysis of economic viability of the affected units listed above.

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**Request for Resolution Meeting**

Pursuant to 36 C.F.R. § 218.11, the objectors request to meet with the reviewing officer to discuss the issues raised in this objection and potential resolution. In the event multiple objections are filed on this decision, AFRC respectfully requests that the resolution meeting be held with all objectors present. AFRC believes that having all objectors together at one time,

though perhaps making for a longer meeting, in the long run, will be a more expeditious process to either resolve appeal issues or move the process along. As you know, 36 C.F.R. § 218.11 gives the Reviewing Officer considerable discretion as to the form of resolution meetings. With that in mind, AFRC requests to participate to the maximum extent practicable and specifically requests to be able to comment on points made by other objectors in the course of the objection resolution meeting.

Thank you for your efforts on this project and your consideration of this objection. AFRC looks forward to our initial resolution meeting. Please contact our representative, Matt Comisky, at the address and phone number shown above, to arrange a date for the resolution meeting.

Sincerely,

A handwritten signature in black ink, appearing to read "Travis Joseph". The signature is written in a cursive, slightly slanted style.

Travis Joseph  
President