HAMPTON LUMBER

March 21, 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, Hampton Lumber files this objection to the proposed draft decision for the Yellowjacket Project. The Yellowjacket Project occurs on the Cowlitz Valley Ranger District (CRVD) on the Gifford Pinchot National Forest.

Objector
Hampton Lumber
9600 SW Barnes Road, Suite 200
Portland, OR 97225

Hampton Lumber is a family-owned company with deep ties to many of the smaller communities around the state of Washington where our manufacturing facilities are located. We believe ensuring a vibrant future for our private and public forests, the local wood products sector, and the communities where we live and work requires dialogue, understanding, and trust among a wide array of stakeholders. We are committed to collaborating state and federal forest and wildlife managers as well as other stakeholders to strike a balance between ecological restoration, wildlife habitat protection, and consistent timber production.

Our ability to support our facilities and surrounding communities is dependent on the availability of raw material from private and public forestlands. Specifically, our Cowlitz Division sawmills in Morton and Randle depend on reliable raw material outputs from the CVRD. The family-wage employment we provide along with the indirect employment created by the presence of our manufacturing facilities benefits schools, businesses, and the overall economic wellbeing of local communities.

Our Cowlitz division produces 510 million board feet (mmbf) of kiln dried stud lumber annually (60% Hem fir, 30% Doug fir, and 10% other species), which is shipped to domestic and international markets. Together these mills also generate:

- 313 direct family-wage jobs;
- $31.2 million in local wages and benefits; and
- $30.7 million in payments to local logging, trucking, and road construction businesses.

Objector's Designated Representative:
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The content of this objection below is based upon the prior specific written comments submitted by Hampton Lumber in response to the Draft EA which are hereby incorporated by reference.

1. The Selected alternative would not meet the project's stated purpose and need. The selected alternative would not provide for the accelerated development of old growth forest character and would not accomplish desired commercial timber production.

The Project's Need for Proposal for old-growth forest habitat states "there is a need to accelerate the development of old-growth forest characteristics within the project area. Characteristics of old-growth forest include large diameter, multi-storied forest stands with concentrations of down wood and standing dead trees. These stand types provide critical habitat to old-growth-dependent species and are vulnerable to increased summer drought stress and increased disturbance potential".

Additionally, the selected alternative would not meet the socioeconomic need of commercial timber production "to provide local job opportunities and to support rural economic development" with only 11% of the planning area being considered for timber harvest including a mere:

- 0.4% being considered for regeneration
- 1.6% being considered for high intensity thinning
- 7% being considered for low intensity thin (the majority of which is proposed in matrix stands, where the major focus for commercial timber harvest is supposed to be placed)
- 2% being considered for huckleberry enhancement

Planning area Acres Analyzed: 40,682			
Treatment	**Treatment Acres**	**Percent of the Treatment Acres**	**Percent of the Planning Area**
Low Intensity Thin	2,994	64%	7%
High Intensity Thin	666	14%	1.6%
Regeneration	155	3%	0.4%
Huckleberry Enhancement	836	18%	2%
Total	**4,651**	**_____**	**11%**

Forest sector income is the supporting backbone of many rural communities within the Gifford Pinchot National Forest. In addition, sustainable forest management depends on acres available

for harvest. Local timber-related businesses depend on a certainty of harvest levels. Fewer acres available results in less wood product available and less opportunity for the associated businesses. This has a disparate impact on timber dependent, underserved communities for which there may be few commensurate alternatives.

NWFP-defined matrix lands are areas outside of reserved allocations are intended to be where most timber harvest and silvicultural activities will occur, with moderate levels of legacy old-growth features amongst creating intended early-seral, or young forest habitat. The "Cispus AMA emphasizes innovative management of landscapes and watersheds to provide for high quality timber, mature forest ecosystems, aquatic and riparian functions, and recreation opportunities. Management is responsive to the role of people in landscapes and promotes social science research.[1]" However, the research and monitoring page for the Cispus AMA has not been updated since 2001[2] and no experimental treatments or research opportunities are proposed in the Yellowjacket EA.

As part of the Guide to Adaptive Management the on Cispus Adaptive Management Area (AMA), outlines the following desired future conditions:

- *AMA – Managed Mosaic:* abundance of early and mid-successional stands, with fast growing young trees where openings may be large scale, depending on other resource objectives for the area.
- *AMA- Old Growth/Riparian Reserve:* presence of old and typically large diameter trees, as well as canopy gaps and small openings throughout the stand also provide structural diversity.
- *AMA – Managed Habitat/Habitat Development:* mix of young, middle-aged, and older forest stands, with generally smaller gaps intended to mimic small, naturally occurring openings.

Matrix lands and AMA-Managed Mosaic lands within the treatment area should be entirely heavy thinned, with large gaps (from 5 up to 40 acres as allowed under the NWFP) of variable retention (regeneration harvest or VRH), whereas the AMA-Old Growth/Riparian Reserve and Managed Habitat areas should include some experimental prescriptions which include additional acreage of canopy gaps and smaller openings to provide the AMA and proposed action's intended structural diversity, as well as that of commercial timber production.

The EA failed to assess the VRH option fully and to disclose the extent that a VRH alternative could meet the desired economic and old forest structure needs. There is no discussion of how the selected alternative would meet long term sustainability and operability of milling infrastructure to support restoration treatments and jobs into the future. There was no alternative assessment of how VRH could provide the purpose and need for old forest structure or resiliency to fire and climate change.

To reiterate our previous comments, much of the planning area has forest stands developed through the successional stages from densely stocked plantations, and therefore lack the ability to

[1] https://www.fs.usda.gov/r6/reo/landuse/ama/locations/cispus.htm
[2] https://www.fs.usda.gov/r6/reo/landuse/ama/research/cispus.htm

produce forest stands with the old-growth forest characteristics required by the Northern spotted owl, as a focal species. The difficulty in developing old forest characteristic in plantation stands is evident in adjacent project areas, in which the treated stands are left with trees with minimal canopy, the majority in the 10-15 percent range. Competition in the plantation stands resulted in growth development in height, with a lack of deep canopy or lateral branches to develop large wolfy limb structure consistent with the old forest structure to meet the purpose and need for improving and maintaining late successional wildlife habitat over the long term.

Thinning to a relative density between 25 - 35 RD will not maximize individual tree diameter and crown growth and accelerate the development of old-growth characteristics. The selected alternative limits proposed treatments to create habitat and accelerate old forest characteristics. Dense stands of second growth timber at age 60 plus have had complete canopy closure for at least 20 years and crown has diminished. The EA fails to disclose why alternate options were not fully considered. An alternative to create accelerated structure within larger majorities of matrix and the AMA managed mosaic LUAs would include reinitiating forest stands with reduced stocking or planted trees with a lower number per acre. This will allow full crown development and allow the limbs to become "wolfy" at an earlier age. As the trees age, competition in the stands would result in lower limbs dying off and crown will recede to 40-50 percent. This will support the gaps in stands that would support understory development, and create a mosaic across the landscape of different forest types to better represent the historic range of variability and in recognition of the future range of variability. It is very difficult to try to create this on a monocultural stand that is 80 years old or above.

Early seral forest is the initial stage of forest development, defined by a disturbance event (e.g., fire, windstorm, harvest) which restarts the forest developmental process. Early seral forests are defined by a lack of dominance of trees. There are two major types of early seral forest:

- **Simplified early seral forest**, defined as having few to no biological legacies (e.g., large snags, large diameter logs, residual large trees from the previous cohort) and low levels of biological diversity. Simplified early seral forests are often dominated by one to a few species and can have low levels of vegetative cover. The simplified early seral forest stage can be fairly abbreviated, often lasting less than 5 years. This stage of forest development is often observed in forests under intensive forest management, but it can also occur because of high severity fire events.

- **Complex early seral forest** (CES). In contrast to simplified early seral, CES is defined by an abundance of legacy structures. Down wood levels in this forest stage can be very high, second only to the old growth forest developmental stage. The CES forest developmental stage has the highest levels of biodiversity of any forest developmental stage due to a rich variety of shrubs and herbaceous species which are often CES specialists. The CES forest stage is also characterized by increased stream flows and high levels of nitrogen fixation. In the absence of vegetation suppression or artificial planting, this stage of forest development can persist for over 40 years before canopy closure.

The CES forest stage carries significant ecological functions but is currently underrepresented on the landscape (only 1.7% of the planning area), even within the LSR allocation.

The high level of biodiversity that occurs in the CES stage provides forage and nesting opportunities and is an important landscape element in wildlife habitat. These elements can serve to lifeboat ecological diversity and function from one cycle of forest development to another.

An important tool in CES creation is VRH. VRH, like other harvest systems, is unique from thinning treatments in that the intention of VRH is to initiate a new forest cohort with legacy stand components rather than limit the treatment to influencing the development of the existing cohort. VRHs aim to create continuity of ecosystem function between rotations, with the retention of biological legacies and complex forest structures. This retention is variable both within and among harvest units in response to existing and desired conditions.

Retaining legacy structures between generations provides critical forest structure that provides important ecological benefits across stand developmental stages. Complex legacy structures provide habitat niches supporting biodiversity. Compositional legacies (retention of species) provide habitat and forage opportunities, and can be important to developmental functions (e.g., nitrogen fixation). Legacy retention can allow for the development of structural complexity that occurs on timescales longer than a single forest generation.

Key structures for retention include large and old live trees, large snags, and large diameter down wood. Openings in the forest stands need to be created of sufficient size to allow for the initiation of understory communities and the eventual natural regeneration of a new cohort of trees. We have experience with stand treatments where 10-to-15-acre gap cuts can help create a true mosaic. Site-specific considerations and existing structures are conditions for sideboards in minimum amount of forest stand retention. As regeneration is a goal of a VRH, density needs to be lowered sufficiently to create growing space for the eventual establishment of a new cohort.

Efforts to create CES should be focused on stands with simplified forest structures and high densities. Stands with high stocking densities with single cohorts of trees and small crowns will likely not respond to thinning to develop old growth structural conditions. These stands could be better suited for regeneration though VRH. More mature stands with lower densities and healthier crowns should be prioritized for thinning to accelerate old growth structural characteristics.

Resolution Requested

The selected alternative should meet the project's purpose and need, with VRH added into the "diversity" of treatment options. We request that you analyze creating larger gaps (i.e., 5 to 40 acres) where allowable in the suite of AMA and matrix allocations, along with larger gaps (up to the .50 acre currently allowable) of CES within the LSR allocation, to create a varying mosaic of successional stages, structural diversity and habitat types.

Additionally, we request you analyze an alternative for larger gaps within the LSR so that at a later date, with requisite amendments to the LSR Assessment, you have NEPA coverage to do the treatments necessary to fully realize the purpose and need. Finally, we ask that the Forest add additional treatment acres to the selected alternative, with the addition of heavy thinning or VRH across most matrix and AMA-Managed Mosaic lands within the treatment area; whereas we

request you analyze experimental prescriptions which include additional acreage of canopy gaps and smaller openings within AMA-Old Growth/Riparian Reserve and Managed Habitat areas to provide the Cispus AMA's and proposed action's intended diversity.

2. The selected Alternative Riparian Reserves treatments do not meet the project Purpose and need. The Riparian Reserve no cut buffers do not meet the ACS objectives to maintain and restore plant communities, and to restore habitat to support well-distributed population of riparian associated species.

The Project's need to increase structural diversity of stands and address the overabundance of dense, mid-seral forest stands within the project area also applies to riparian reserves. The current no cut buffers would retain riparian areas in the currently undesirable condition the EA identified. Treatment is required to meet purpose and need. Ignoring this condition and using the EA identified no cut buffers hinders meeting the project purpose and need.

Additionally, the goal of any Forest Service vegetation management project should be to meet the stated project objectives to the maximum extent across as many acres of the project area as possible. In our previous comments we proposed analyzing active management in the riparian areas and there is sound science behind treating in these areas.

Contemporary buffers of up to 100 ft (30 m) and often smaller (40 ft) are successful at moderating the effects of the most intense harvest practices (VRH) on stream sediment, temperature, and wood input. Most studies of in-stream responses to buffers are within regeneration treatments. Most harvests on Federal land are not regeneration, so the buffers will likely be more effective at moderating adverse effects of harvest than these studies show.

On the Gifford Pinchot National Forest, the Upper Wind Vegetation Management Project (2022) finalized 100- foot no-harvest buffers for fish bearing streams and 90-foot no-harvest buffers on non-fish bearing streams compared to the 60–180-foot buffers proposed.

Furthermore, the CVRD has used much smaller no harvest buffers (60-100 feet) on the most recent Kraus Ridge EA (2020), with minor effects to the human environment, as summarized below:

- *Risk of management-induced landslides would not increase due to the proposed action.*
- *Microclimate (i.e., air and soil temperatures, moisture, and humidity) remain unchanged after post-harvest activities. Microclimate conditions would remain relatively unchanged while stand development in riparian reserves near streams continue to grow slowly with increased canopy structure and undergrowth of vegetation (McConnell 2019, p. 22[3]).*
- *All the harvested areas with nearby streams or open water bodies would not impact primary shade zone.*
- *Generally, continued growth of trees along streams would provide the necessary streamside shading and help reduce any large stream temperature swings from the effects of insolation (McConnell 2019, p. 2).*

[3] McConnell, Michael. 2019. Kraus Ridge Hydrology Report. 68 pp.

- *No additional losses in soil productivity are predicted in any of the units. Project design criteria (PDCs) and mitigation measures would minimize and restore detrimental soil compaction and displacement so that detrimental conditions would not remain long-term.*
- *Soil erosion would be mitigated upon closure of the timber sale activities, as described in PDCs, "Areas of gouging or soil displacement resulting from logging systems will be treated to prevent rill and gully erosion and potential sediment delivery to stream courses.*
- *Lakell III and others (2010) studied three different buffer zones (7.6, 15.2, and 30.4 meters) and found that 97% of management related erosion in a watershed can be trapped on-site within the harvest area before reaching the stream.*

The selected alternative's no cut harvest buffers are significantly larger than other previously approved programmatic biological assessments in the Region. In fact, the Willamette and Mt. Hood Programmatic uses a no-harvest buffer of 120 feet along listed fish habitat, 75-100 feet along fish bearing, 60 feet along non-fish perennial and 30 feet for intermittent streams. The proposed action no-cut buffers are also larger than the majority of environmental assessments previously negotiated with USFWS and NMFS within Washington state. Also, in Western Washington, the Mount Baker-Snoqualmie (MBS) South Fork Stillaguamish EA used a 15-foot buffer (each side) on intermittent non-fish bearing streams, 30-foot for perennial non-fish bearing, and 100-foot for fish bearing. MBS fish biologists modeled the specific area, and due to the small area actually being treated within the Riparian Reserves, came up with a "not likely to adversely affect" call.

Even under the MBS's most recent environmental assessment for the North Fork Stillaguamish landscape, the Forest concludes there would "likely to be no effects on stream temperature" and standards of the DOE would be met using a 100-foot buffer on fish bearing streams. They further state that "the literature is in consensus that a 100-foot no-cut buffer would result in no detectable changes to stream temperature following vegetation reduction harvests (Wilkerson et al. 2006[4])".

The riparian forest is an ecosystem in and of itself and treating it simply as a buffer to moderate the effects of upland harvests on stream temperature and wood input neglects other important ecosystem functions. For example, fish abundance and size can be higher near harvests due to better insect production and prey visibility. Natural forested riparian ecosystems contain gaps and complex species assemblages that are not necessarily present in plantation Douglas-fir regions within stream buffer areas.

The Forest's response to comments state that "riparian reserves are not dedicated to timber management or expected to provide economic returns", rather they are "specifically managed to maintain or not retard the ecological process and functions as described in all nine of the ACS. While we understand that standards and guides require consistency with the ACS determined,

[4] Wilkerson, E., Hagan, J.M, Siegel, D, Whitman, A.A. The Effectiveness of Different Buffer Widths for Protecting Headwater Stream Temperature in Maine, *Forest Science*, Volume 52, Issue 3, June 2006, Pages 221–231, https://doi.org/10.1093/forestscience/52.3.221

past harvest practices have left many of these riparian areas in a structurally simple state, which *cannot* meet ACS objectives with the overly wide buffers proposed.

The vast majority of studies show that buffers of 50 to 100' and are successful at moderating adverse effects of upslope harvests on stream conditions, very few evaluate buffers larger than this. Most buffer studies examine effects of regeneration on streams. Therefore, smaller buffers may suffice when less intense harvest is used. Stream temperatures generally return to baseline levels quickly following harvest and within a relatively short distance after flowing into shaded areas from a harvested area. Most dead wood contributed to streams comes from forests closer than 100' from the stream.

These proposed buffers can result in outsourcing community viability and resilience, create a dependency on imports and then create a need for support payments to rural communities. This occurs when there is an obvious need to increase the pace and scale of treatment for healthy resilient forests through management on the National Forests.

An additional concern with the 180 ft. no cut riparian buffer is that the EA did not assess how these wider buffers may influence road density or need for new temporary roads or landings. There was no discussion of how avoiding the wider buffers could result in the need for additional temporary roads to avoid the no-cut buffers, nor the potential need for new landings to be outside of the no-cut buffers. There was also no assessment of the potential for treatment areas to be dropped if no-cut buffers result in treatment areas becoming so small as to not cover the cost of access, (road costs) or if after application of the buffers, the treatment area would become too challenging logistically to treat safely or economically with current logging equipment.

Resolution Requested

Using the wide array of best available science is requested for assessing what alternative treatments can best meet the ACS objectives, and the project's restoration objectives identified in the need for proposal. We would like the District to review the literature we previously submitted and incorporate findings into the final EA and DN. This will better shape the level of management permitted in the project's Riparian Reserves. The proposed buffers will have significant impacts on the operability of vegetation management and thinning sales that will have detrimental economic impact on local businesses and rural communities, and the EA failed to analyze these impacts. Please analyze these impacts to comply with the hard-look doctrine of NEPA, to ensure the Forest's decision is well informed, and the impacts are fully disclosed to the public.

We request use of condition-based management for the no-cut buffers. If current site-specific conditions are meeting desired conditions of down wood, species diversity, large diameter trees, and multi-layer canopies, then use wider 100 foot no-cut buffers widths. Desired riparian conditions are more than large wood and shade; if the conditions in the riparian areas are too densely stocked, with little diversity of species, lacking in large down wood and structural complexity, then use a narrower 30 to 50 foot no-cut buffer, with thinning treatments within the riparian reserve to truly meet ACS objectives. Treatments to diversify all areas of the reserve, and prescriptions that account for the full range of objectives that the ACS mandates should be fully analyzed.

3. The EA fails to analyze impacts on local jobs and rural economic development as purported in the need for proposal. There is no socioeconomic issue statement and subsequent effects analysis.

Commercial timber production is listed in the need for proposal "to provide local job opportunities and to support rural economic development" yet no socioeconomic section exists in the EA. There is no assessment of direct benefits from commercial timber production, such as improved forest health and resiliency, water quality, wildlife habitat, as well as indirect socioeconomic benefits realized by local job creation and sustaining local forest product industry jobs, supporting mill infrastructure and continued operability through volume produced, and generation of additional restoration funding through the various types of timbers sales offered.

Resolution Requested
We request you carefully examine economic metrics to determine the context and intensity of alternatives on the stability of local and regional economies, and how it contributes valuable resources to the economy, on a predictable and long-term basis. Socioeconomic metrics to consider would include local job creation (for every 1 mmbf produced, 12 jobs are created), supporting mill infrastructure and continued operability, and generation of additional future restoration funding through stewardship contracting and Good Neighbor Authority (GNA), and timber sales providing potential volume to regional mills.

Additionally, Hampton Lumber directly employs over 300 people at our Cowlitz Division mills, along with our remanufacturing facility in Napavine. For every one job at our mills, two other jobs are created in the community, for our facilities alone, that is a direct impact of 600 jobs created locally. This metric should be calculated and averaged for the mills within the Forest's working circle.

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, Hampton respectfully requests that the resolution meeting be held with all objectors present. Hampton 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, Hampton 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. Hampton looks forward to our initial resolution meeting. Please contact me to arrange a date for the resolution meeting.

Sincerely,
Anjolene Ngari
Collaborative Forestry Manager