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RE: Stone Creek Vegetation Management Project

Dear Phil and the West Zone IDT,

Happy New Year and thank you for the opportunity to provide input on the Stone Creek project. I was sorry to miss the CSP field tour in September—if any future visits to the project area are planned, I'd love to join.

Given that this is the first big vegetation management EA on the district since the Riverside fire, it seems like a reasonable set of actions for the planning team to propose and hopefully cultivate some public trust around. The project is not overwhelmingly large, the proposed logging is focused on under-80 plantation stands mostly in C1, with no logging in late successional reserves or NSO suitable habitat, and it appears to be all thinning without large gaps. This is a shift from what I interpreted as the direction things were headed on the west zone pre-Covid, and I appreciate the approach. Also, the mere fact that the project is being planned as an EA and not a CE makes the process so much more inclusive and worth the time engaging with—I haven't bothered to comment on the last handful of I&D CEs over the past couple of years because of how unlikely commenting will have any influence once those types of projects reach the public comment stage. I'm hopeful that this project sets a positive precedent for planning efforts on the district in the future.

System roads

I strongly support efforts to reduce the open road system on the forest to benefit the resources affected by roads and to lower maintenance costs funded by taxpayers. At the same time, I recognize the importance of striking a balance, particularly given the high level of recreation activity south of Timothy Lake during the summer months.

After looking at the INFRA roads table and the TAR's lists of roads deemed needed vs not needed, the proposed action appears to effectively move toward the objective road system. The plan to close 20 miles of roads and passively decommission an additional 2 miles is a positive step. Many of these roads are located in riparian areas, so it's also encouraging to see proposed actions to improve conditions at stream crossings, such as replacing culverts and stormproofing, in lieu of ripping the roads.

A few years ago, I walked up the 4200-027 road and recall it effectively ending in dense vegetation near where the passive decommissioning is proposed to begin. While it may not seem like a bold approach to some, I believe passive decommissioning is appropriate in cases like this. When a road is already naturally recovering, actively treating it could create unnecessary impacts or even draw attention to an area that is better left undisturbed.

I noticed that the 4200-030 road is proposed for closure. According to maps, it crosses Stone Creek to connect with the 5740-261 road. However, based on my recollection (which admittedly may or may not be totally accurate), the road doesn't actually remain open to complete this connection. The INFRA roads database lists the road as Maintenance Level 2, with the last approximately 0.5 miles being a native surface. Regardless of it being currently open or not, the segment passing through the Riparian Reserves to reach the other road seems redundant and could be added to the list of roads to decommission, in my opinion.

Temporary roads

The scoping letter says that temporary roads are still being evaluated but doesn't specify whether their proposed locations will be included in the draft EA. In the past, new and existing temporary road alignments proposed to be utilized were mapped, often in Scoping, which was very helpful in understanding how the project might look. I think there has always been a caveat that some roads might end up in a slightly different location than originally planned, or additional roads might be built, or that a particular road might not be built at all, etc. However, I've found it to be a somewhat rare case that a temporary road wasn't where it "should" be according to the NEPA and/or contract documents available to the public.

There was a bit of controversy in the Hood River and Wasco County collaboratives during Covid about temporary roads no longer being mapped in project planning documents on the east side. I won't rehash all the details, but the groups talked through several specific examples of when knowing the likely locations of temporary roads (not just PDCs related to temporary roads) was important in the past and had resulted in good collaboration and better projects. And given that temporary roads haven't always ended up in the most ideal locations, mapping them out has allowed for visiting them post-implementation to understand and learn from their impacts. I even remember a now retired NEPA planner mentioning that it felt like a stretch to ask the public to trust that roads would be appropriately placed without providing any information about their locations, and that it also seemed unlikely that the agency hadn't already formed an idea of where roads were likely to be located by the public comment period. Meta Loftsgaarden came to the Wasco County collaborative just to discuss the issue, and I

remember we came to a resolution afterwards, where after hearing various concerns about the new approach of relying solely on PDCs, the agency agreed to share the proposed road locations in the planning documents as it had done previously.

Temporary roads have potential to bring about the most long-term impacts of thinning projects like the one proposed here. Which is why I believe it's important to limit them as much as possible, especially new roads. I also feel strongly that the locations of any proposed temporary roads are included in the draft EA maps.

Incidental damage

There's no denying that landings, skid trails, and temporary roads from past thinning projects on the district have at times played a role in unauthorized road and/or trail building and other damaging activities from the public, especially when units under contract aren't adequately administered and/or meaningful actions aren't taken to prevent these activities. Which is why I think it's important for there to be site specific PDCs in problem areas that can be conveyed by contract administration. Some recent projects seemed to get things right: Temporary road closures completed within the Memaloose area were effective in reducing unauthorized target shooting, illegal OHV use, and garbage dumping in thinning units. Effective actions implemented in the La Dee flats area have included boulders and logs being placed along the road, large berms, re-contouring, revegetating, etc. Given that the areas surrounding Timothy Lake get so much recreational use, I encourage the FS to employ these types of strategies within the Stone project.

While Stone is under contract, roads constructed or reopened for the project could provide unregulated motorized access, as roads may be needed for more than one season. To restrict access when operations are not occurring (including between the normal operating seasons if work in a unit is not complete within one season), please consider piling slash on the first fifty to hundred or so feet of road or skid trail, and placing boulders at the entrance to units from main road. It may conflict with the roadside hazardous fuels action in some places, but perhaps leaving a vegetated screen along roads could help obstruct unauthorized motorized access in units where this is expected to be more likely based on past and/or current use. And in general, providing adequate sale administration staffing emphasizes clear communication of expectations to contractors of the project's intent and how related PDCs reflect it. This also allows inspection by the sale administrator before the contractor's equipment is moved offsite.

Riparian reserves

I've encountered two main ways of interpreting the Forest Service's guidance on timber management within Riparian Reserves. One interpretation is that any action is permissible as long as it doesn't explicitly conflict with the Aquatic Conservation Strategy Objectives. The other, which I align more with, is that proposed actions should be justified as necessary to achieve these objectives. Riparian Reserves across the project area likely exist in a wide range of conditions influenced by factors such as topography, species composition, fire suppression, and past timber harvest. Thus, I believe it's important for the draft EA to reflect this variability and provide clear justification for why management actions are needed to support riparian health and function, including the recruitment of dead wood.

NSO and late successional habitat

It looks as though the entire project area falls within designated NSO Critical Habitat. While the proposed thinning isn't targeting suitable habitat, plantations often contain legacy trees or small pockets of late-successional structure. Retaining any such features and buffering them with canopy closure and midstory retention would clearly benefit owls.

Regarding the concern about insects and disease highlighted in the Scoping letter, it's important to acknowledge their role in nutrient cycling and forest succession, including snag and dead wood recruitment. So I think that striking a balance between promoting tree vigor and maintaining current habitat as well as promoting future habitat trees within the proposed units is crucial.

Finally, it's encouraging to see prescribed burning included as a proposed action in this project. It's also reassuring to hear that there have been discussions about protecting older trees and other components of late-successional habitat during implementation.

Sanitation treatments

I'd likely have a better understanding of the situation in these stands if I had attended the tour or walked the area recently, so please take my observations here with some caution. That said, I've seen the CRRD battle against the sick or otherwise unpopular lodgepole pines for years and have learned that it's no simple endeavor. If the goal is to promote insect- and disease-free trees by removing lodgepole pines, it's worth considering that these pines might be the only trees adapted to the harsh frost conditions caused by previous (and maybe future) canopy removal. In several cases, efforts to remove lodgepoles have simply led to a new stand of lodgepoles rather than the more desired species, making this a challenging cycle to break.

I remember walking through some units of the Hunter EA project in the Upper Clackamas where the FS had aggressively attempted multiple times to grow Douglas firs, but had failed due to harsh site conditions. I think the new approach was to rid the stands, through shelterwood, of most of their lodgepoles, which had been originally planted from offsite as a “nurse” crop. I remember there was a fair amount of uncertainty in how that would play out, and I haven’t been back to those units to see if they’ve been treated and if so how they’re doing now.

In the Lemiti Butte project up the 4220 road, there was a pine beetle outbreak that killed most of the lodgepoles in the area, which was also in a frost pocket. But in the sheltered understory of the dead trees (before they were removed) there was a robust understory of moist mixed conifer tree species that was moving towards more of a mountain hemlock plant association. I remember seeing nearby areas along the road where trees had been cut, which responded with a carpet of lodgepoles. I talked to someone who several decades back saw a similar beetle kill with hemlock understory in the same part of the district where lodgepoles were similarly removed afterwards, which rid the stand of hemlocks and restarted the lodgepole cycle. The last time I was at Lemiti, after the lodgepoles had begun to be chipped onsite, it was clear that much of the understory was not going to make it through the duration of the work. It would be interesting to see what’s regenerated since then.

All of this is to say that revisiting these stands and others could provide valuable insights for the current situation. It seems to be a delicate balance—transitioning away from a lodgepole overstory while protecting the existing understory from frost and other impacts. This might involve minimizing ground disturbance and retaining more of the overstory in certain areas to buffer the understory, particularly where underburning is less concentrated. While it may feel unsatisfactory to leave parts of a stand untreated due to uncertain outcomes, in some cases, this might be the most prudent approach for achieving long-term desired conditions. Even if these sections of units aren’t ideal from a silvicultural perspective, they likely provide enough ecological value within the broader landscape to avoid being viewed as a full blown crisis.

Recreation actions

Considering the area's high recreational use and the impacts that sometimes accompany it, it's a little surprising not to see any recreation-related actions included in the proposal. Perhaps these are addressed under another programmatic NEPA decision? If not, this project could be a good opportunity to address impacts caused by large dispersed camps along the 5740 road network and other heavily used areas. That said, I know significant work has already been approved through Retained Receipts and

completed in the area, with more potentially on the way outside of this EA. Either way, I support it.

Climate change vulnerability and adaptation

It's encouraging to see the Climate Change Vulnerability Assessment referenced in the scoping letter. I remember attending its rollout meetings and writing many comments while the assessment was in draft stages about how important it would be for the Forest to include its findings in future planning. I hope a commitment to climate adaptation takes a leading role in future projects across the district and the Forest.

I'm looking forward to reading the draft EA. Thanks once again for the opportunity to comment and please feel free to contact me if you feel it'd be helpful.

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