

Comment on Plantation Thin & Potential Control Line Treatments EA

Collin Neuhauser

1. Temporary roads. The Gifford Pinchot NF has been using a loophole to not fully decommission temp roads if they follow the path of a previous road. These "preexisting temp roads" are left in the equivalent of ML1 status but not documented as such. This means the USFS is recompacting the partially recovered road, installing water bars every 200 feet, and removing any culverts installed for the timber sale. Preexisting culverts are sometimes left in place. One example of an abandoned culvert in the skinner timber sale is at 46.485542, -121.968326. The road surface is also not decompacted or outsloped. One example of serious erosion issues is along the Ben4 temp road near 46.370706, -122.003504.

PDC 64 in this EA states that "All non-system roads will be decommissioned after completion of project activities, which includes removing stream crossings, de-compacting the road surface, and blocking vehicle access."

I take this to mean that preexisting temp roads will be decompacted because they are not system roads. Hopefully the loophole will not continue to be used.

2. ML1 roads in LSR. ML1 roads, especially those in LSR, should be considered for decommissioning if no future reentry is planned. There is already a large backlog of decommissioning connected to the Kraus Ridge and Yellowjacket EAs. I would like to see the decommissioning tied to the timber sale contracts. Good Neighbor Authority would be a good option for LSR areas with many ML1 roads.

3. Invasive species: I have first hand experience seeing the USFS fail to follow invasive species mitigations. Contractors often fail to wash equipment, especially between units. Road construction often introduces new weeds or activates existing seed banks that had been shaded out.

There needs to be more accountability when it comes to implementing invasive species mitigations. Now that staffing has decreased to such an unsustainable level, it cannot be expected that forest staff will be able to keep up with invasives treatments. Some other solution needs to be identified in this EA.

4. Contractors not being held accountable. Due to lack of staffing to monitor their work, contractors often fail to follow the specifications they are given.

One example is the culvert installed on the 2502 road at Teacher Pond near Randle. The contractor failed to dewater the site properly and decided that the dig site was too muddy. He then installed the culvert three feet higher than intended. The water level was intended to be at the midpoint of the culvert, its widest point, to mitigate future erosion from impacting the ability of aquatic organisms to migrate within the watershed.

Another example are the preexisting temp roads that connect to the 2511 road near Randle. The contractor bulldozed open the roads in 2024. Many of the preexisting culverts in the area were plugged. As the winter rains came, the roads were extremely vulnerable to erosion from the culverts overflowing onto the newly bulldozed roads. According to the NEPA for the Nash timber sale, the contractor was not allowed to leave the road in that state over the winter.

5. Overlap with planned EAs. I would like to see clarification of how this EA will mesh with the current and future watershed level EAs. I am curious why plantations being treated in the Yellowjacket EA were not excluded from what I can tell. There is also a lot of overlap with the Skate EA, Pool EA, Little White Salmon EA, etc.

I am especially concerned about the mineral block area because there are so many unknowns in that area that need to be documented and analyzed. I am already concerned about the forest's ability to properly analyze the mineral block area with its skeleton crew staffing. I think it is important that the forest collaborate with various interest groups to determine what to prioritize within the mineral block when it comes to closing and stabilizing or decommissioning roads. The surface level analysis in this EA is not adequate for the mineral block.

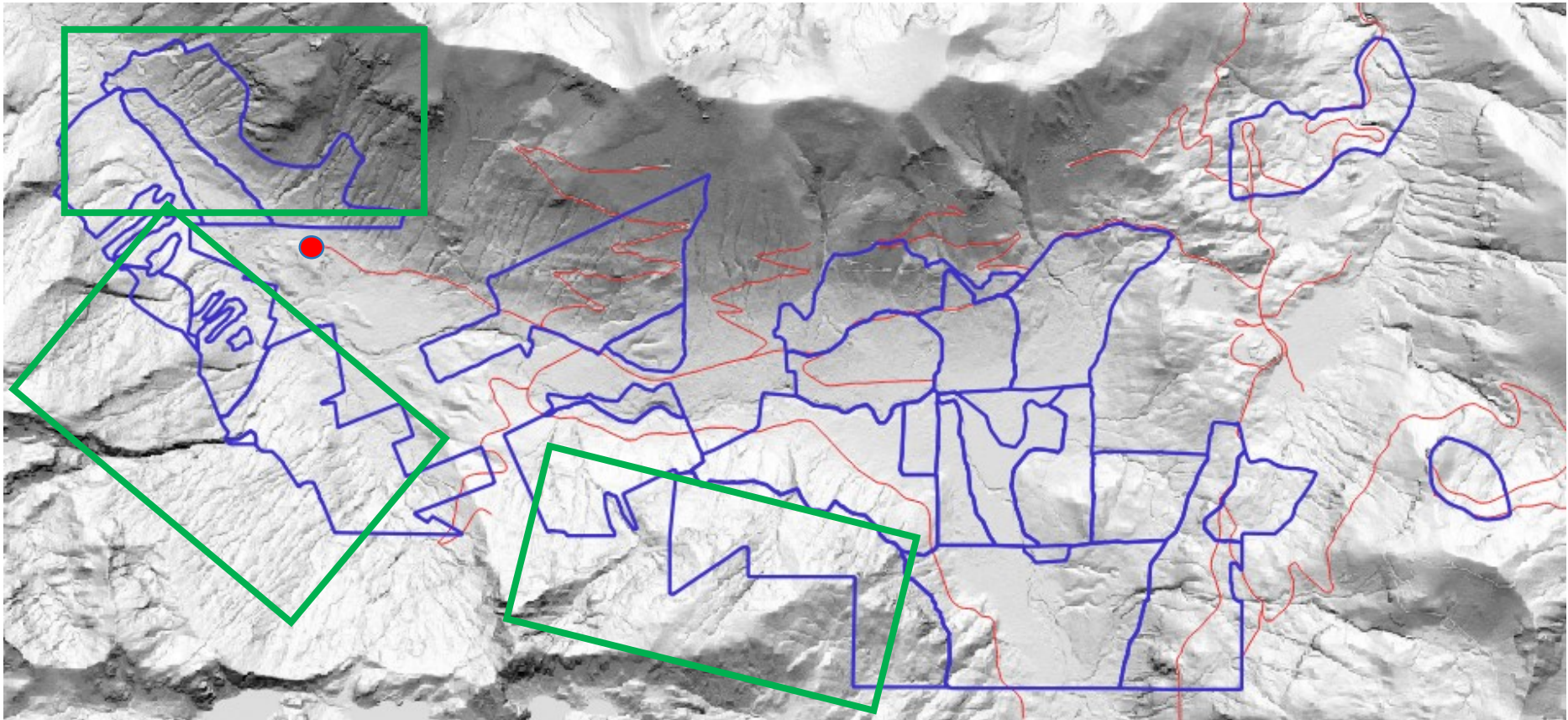
6. Data errors. Please work to update the forest's management data such as the roads layer and stand layer. Some of the many errors are impacting the analysis process and others will lead to poor decisions being made when laying out the sales. Similar errors were ignored during the layout process for Yellowjacket sales. A timber employee joked that the road layer indiscrepancies would be resolved with a bulldozer. In reality they were leaving it for the timber sale administrator to figure out. There are too few timber sale administrators for them to be left to resolve what should have been found in the analysis.

Road locations should be confirmed in the analysis phase or at least the layout phase. ML1 roads that were missed in past analysis should not be lumped into being "preexisting temp roads". If there are culverts present, it is a road. The roads layer can be updated by regional GIS staff using LIDAR. Only very flat or otherwise obscured locations need ground truthing. A preliminary layer of suggested edits was sent to engineering staff in late 2024.

Stand data also urgently needs to be updated. There are many stands missing from the stands under 80 layer. Please use satellite imagery and DSM LIDAR to identify stands that need to be documented for future treatment. It is especially disappointing to see this current EA missing stands that are glaringly obvious in Google Earth.

7. 120 year entry into LSR. This EA seems poorly timed with the new NW forest plan that will allow entry into LSR for 120 years. There are many isolated stands with origins in the 1930s to early 1950s that will be challenging to package as a future EA and sales. I would like to have seen at least LSR stands 80-100 years old included in this EA.

Upper Green River Watershed

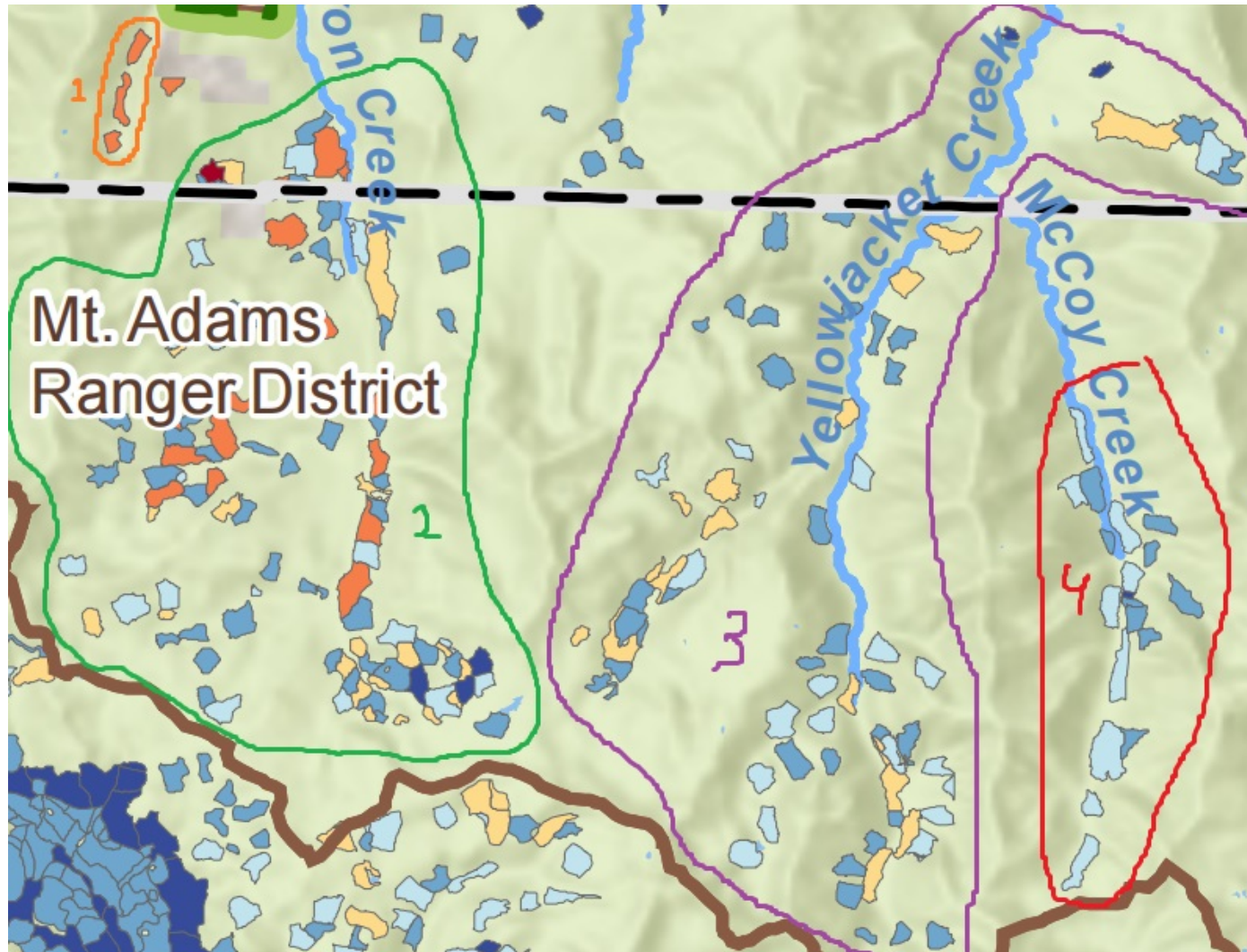


● Severe scotchbroom infestation on Weyerhaeuser land

□ Areas of steep slopes with no existing roads, I would like to see these areas dropped from the EA. The area is prone to landslides

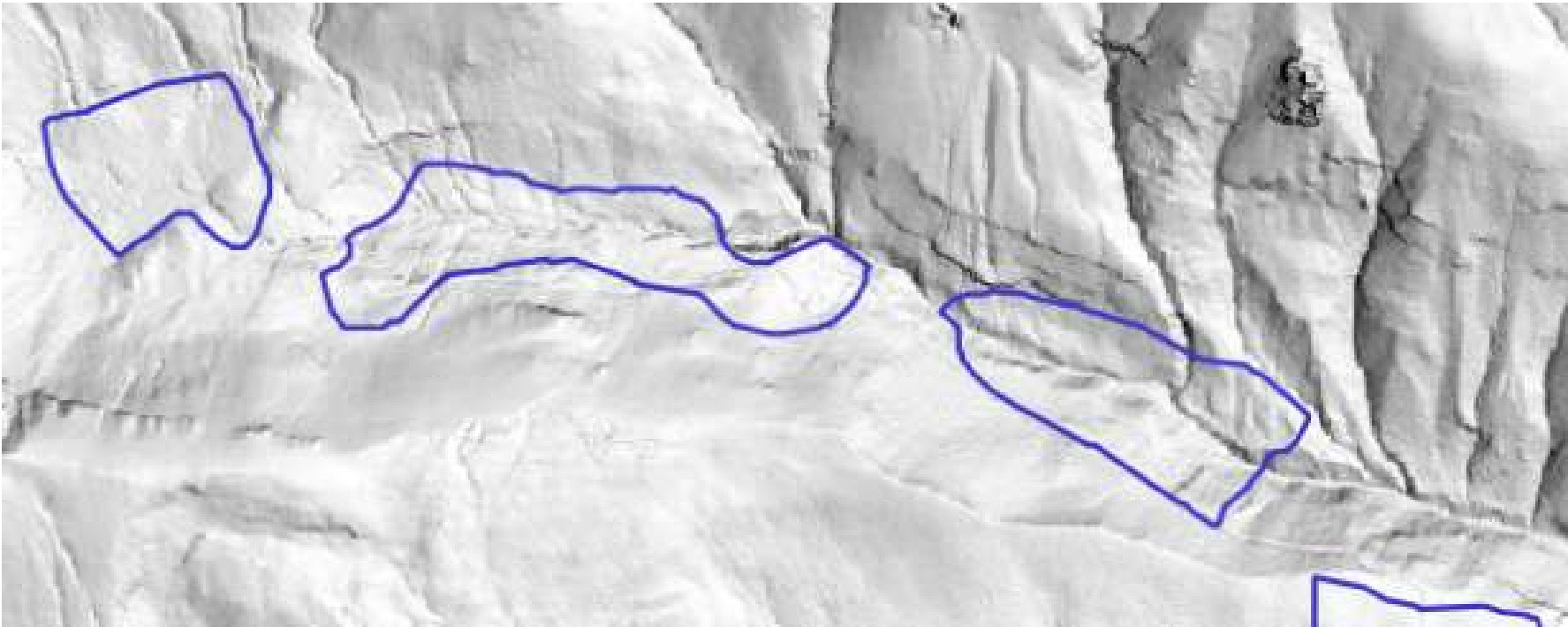
The 26 Road from 2612 junction to 99 junction is in the most need of the pavement reclamation analyzed in the Iron Crystal EA. I would like to see that reclamation paid for through timber sales using the 26 road if another funding source is not available.

Iron Creek and Yellowjacket Creek



1. Units in the Crystal Creek watershed
2. Iron Creek watershed.
This area was analyzed in the Iron Crystal EA from 2017 that has recently been implemented.
3. Yellowjacket watershed
This was just analyzed in the Yellowjacket EA.
4. McCoy Creek watershed

1. Crystal Creek



These units in the Crystal Creek watershed straddle the creek and do not make sense to harvest. Rebuilding the road would cause more negative impacts than any positives from the small amount of thinning that would be feasible outside of the riparian reserve. Please consider dropping these units from the EA.

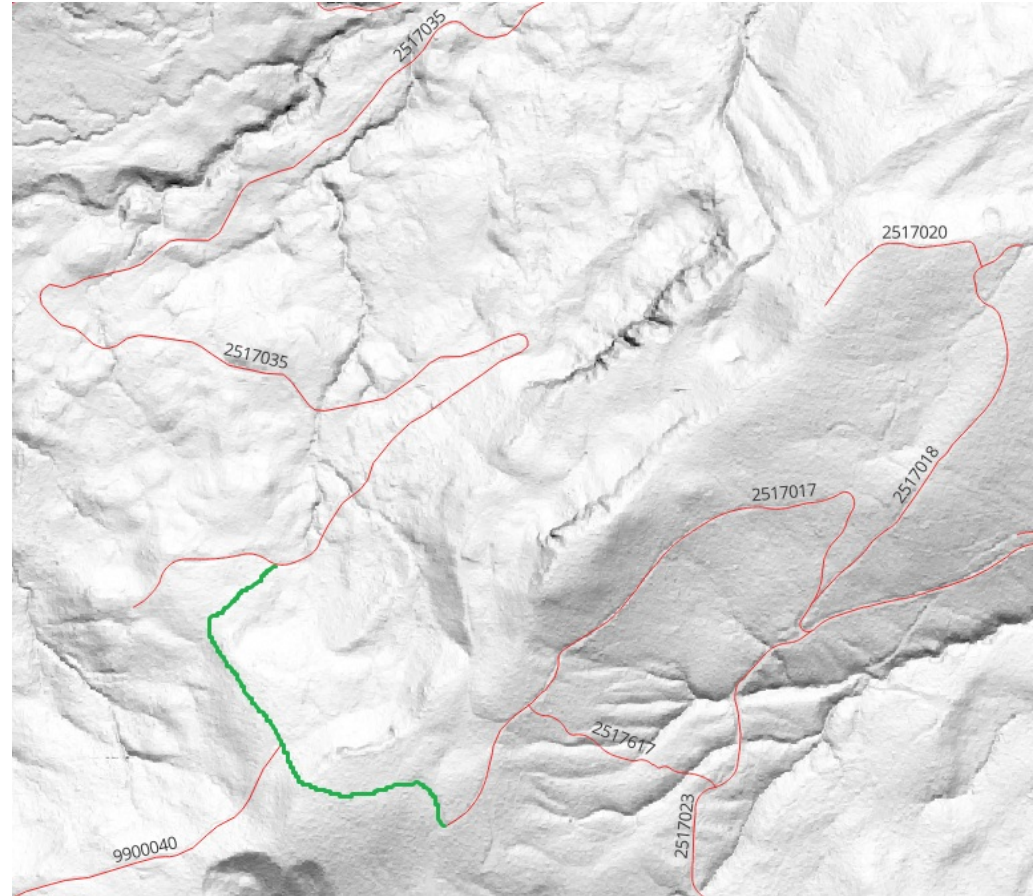
2. Iron Creek Watershed

- To my understanding the plantations east of Iron Creek were dropped due to the feasibility and cost of access. Has anything changed?
- The 2500210 was already designated for decommissioning in the Iron Crystal EA including the removal of a log stringer bridge. I am concerned that a road that was deemed to be of no use is now going to be needed for this EA. I think it shows how little thought is going into road management on the forest.
- The Ferrous timber sale units are not shown in the completed sales map. This seems like an oversight.
- I would like the opportunity to comment on how units along the 2510 and 7708 will be accessed and closed after their use. Both of these roads are of high aquatic risk and should be decommissioned unless there is a justifiable need for them. If they are needed, then they should have culverts removed and be stormproofed.
- The public has breached barriers installed on the 2500-224 road system. There is similar erosion in that area as is shown in the photos below. Please have contractors do a better job of installing barriers.



Erosion on temp road accessing Ben4 unit 45. This temp road should have been outsloped, decompacted, and covered with slash. The soils on the west side of Iron Creek are very erodable due to their volcanic composition. I hope that temp roads are restored after use more effectively than they were under the Iron Crystal EA.

Iron Creek Watershed Continued



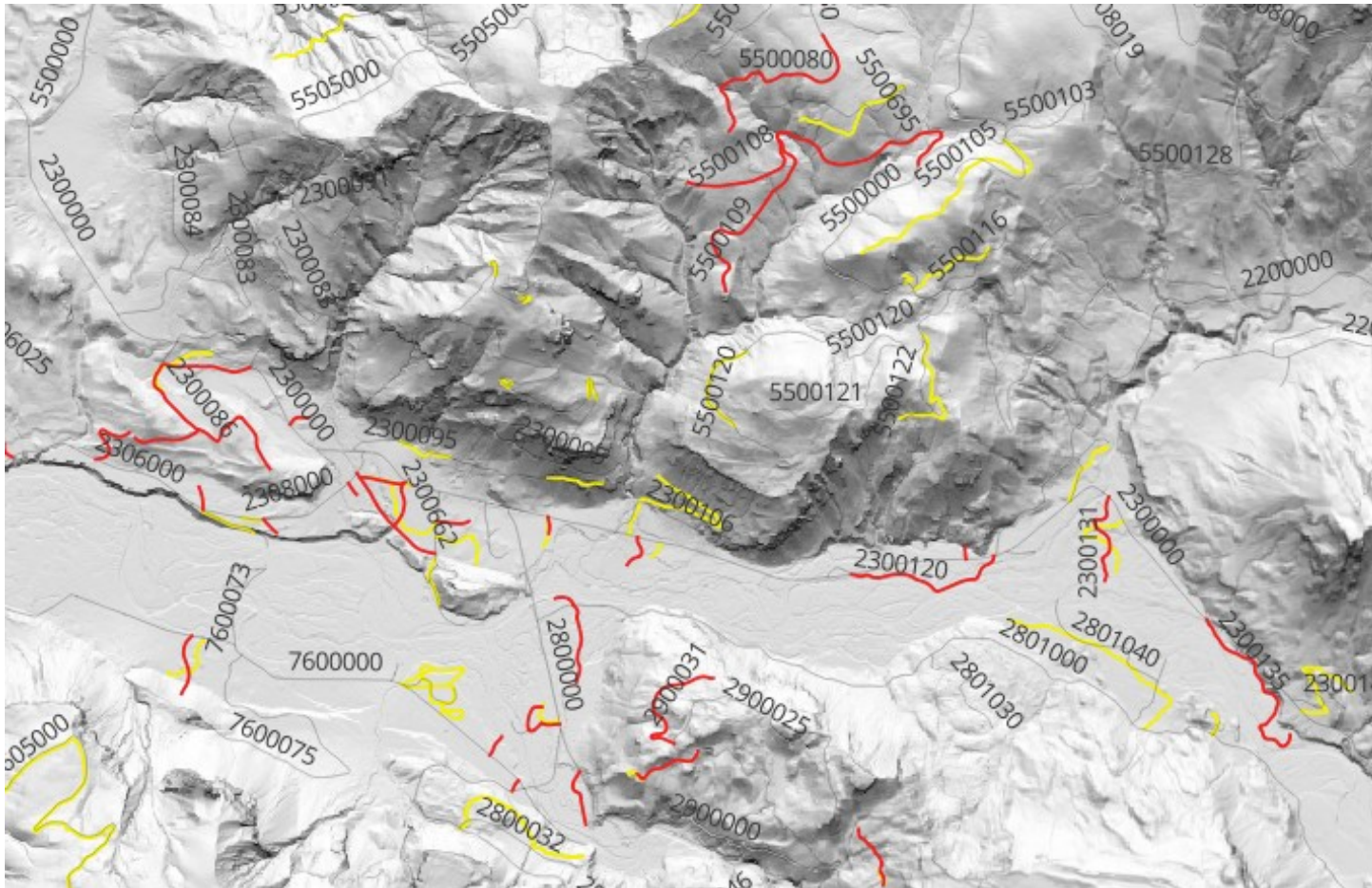
The northern portion of the 2517-035 has been decommissioned and has multiple large creek crossings. I have found that there is alternate access by building a temp road from the 2517-017 or the 9900-040. The route, indicated in green, crosses through only plantations and has no creek crossings. The 2517-017 was recently rebuilt for the ferrous sale. Also of note are the 2517-617 and 2517-678. Neither of these roads exist and should be removed from the roads layer. The selected portion of the 2517-035 should also be removed with how thoroughly decommissioned it is.



Girdling leave trees adjacent to a ML5 road to use them as tailholds does not make sense. Now there will be large snags along one of the primary routes in the forest. This was in Nash unit 17. Please avoid allowing this in the future.

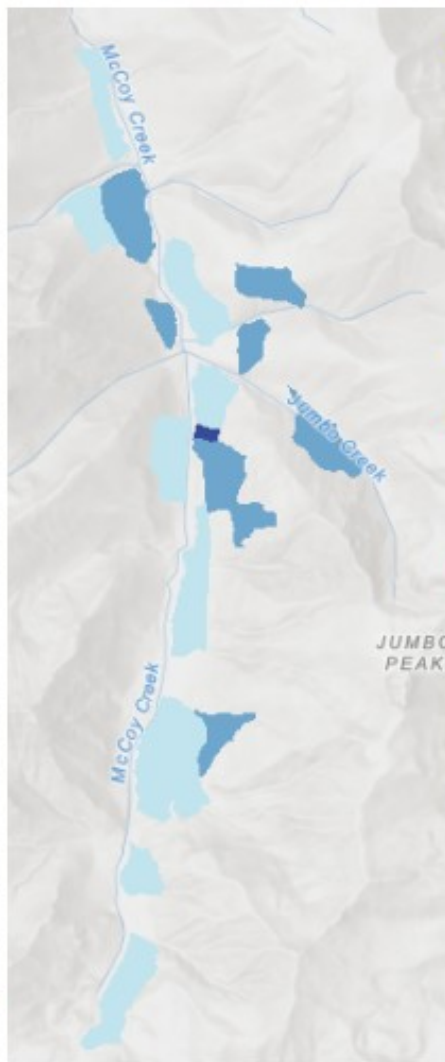
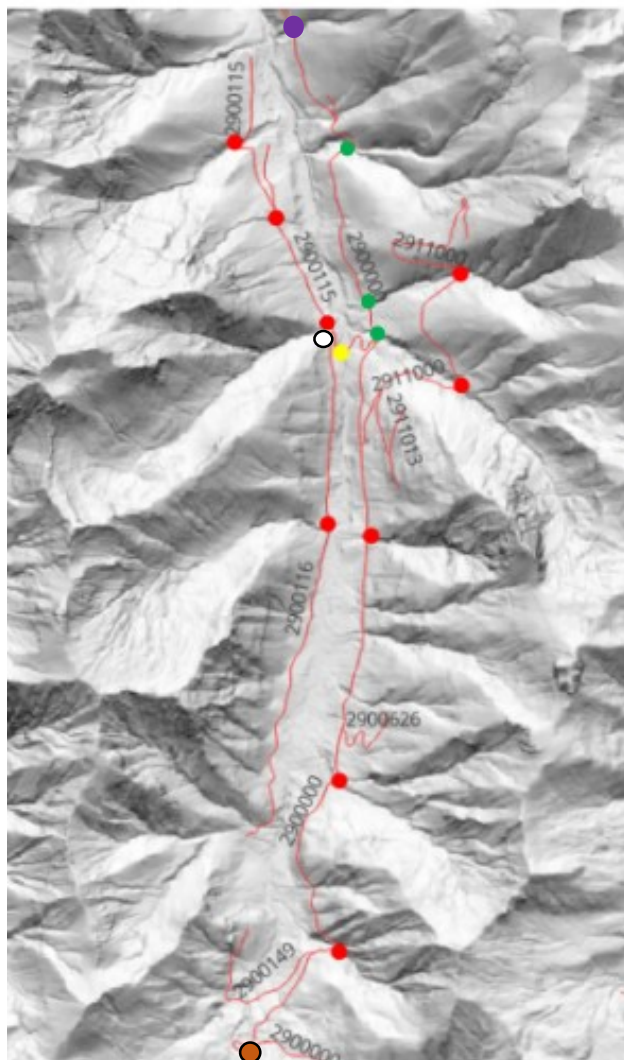
3. Yellowjacket Creek

- Most of the units proposed were already analyzed in the very recent Yellowjacket EA.
- Units in the Pumice Creek and Veta watersheds were likely excluded from the Yellowjacket EA due to poor access.
- Please exclude the Yellowjacket EA area from this EA.



- Red roads are ones that were selected for closure or decommissioning in the Yellowjacket EA.
- Yellow is my mapping of roads that were not accurate in the roads layer.
- I do not think it is okay that EAs are completed without checking the accuracy of the data and correcting mistakes. Roads data can be checked against LIDAR unless the terrain is very flat and stand data can be checked against a combination of LIDAR and historic imagery.

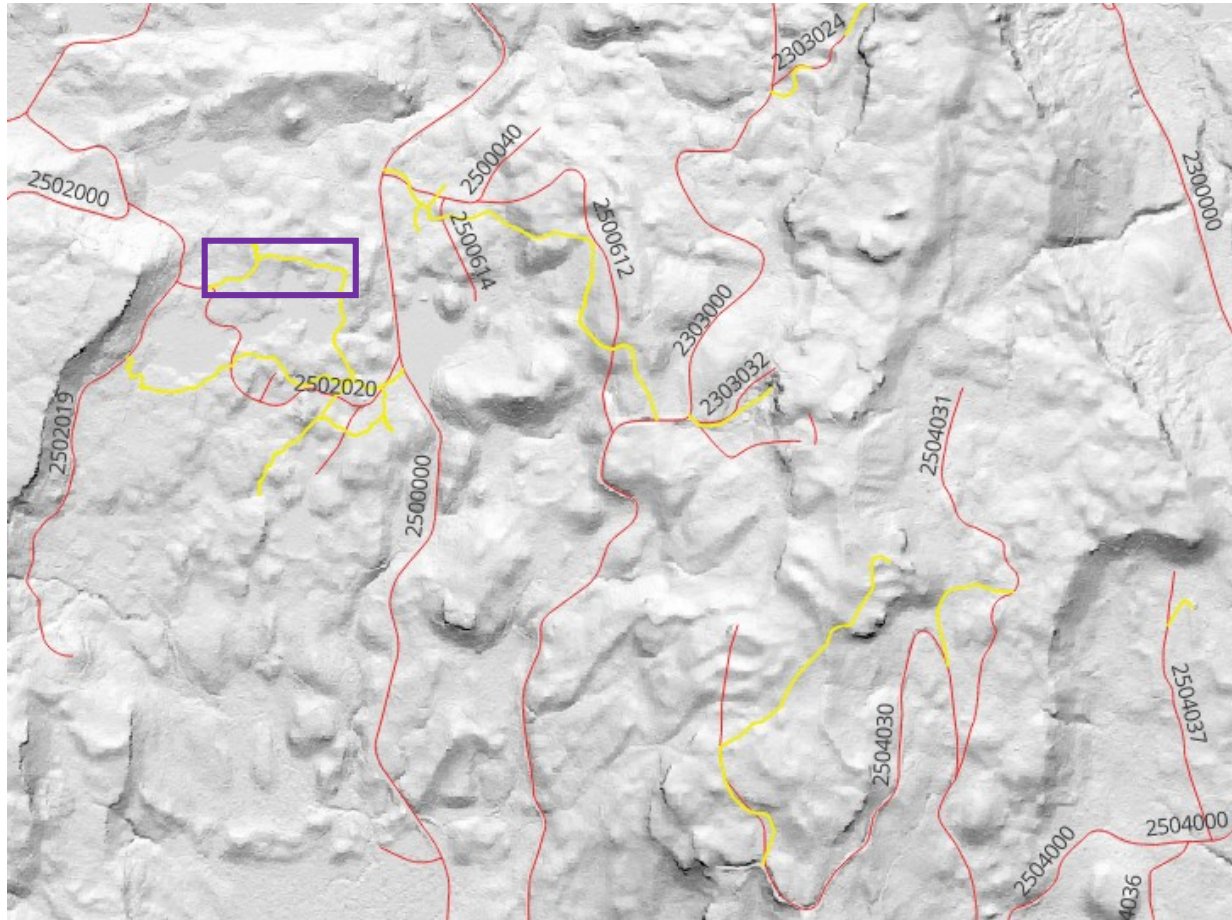
4. McCoy Creek



- McCoy Creek culvert. This culvert is on the forest's list of top 40 AOP barriers. I would like the forest to analyse the option of replacing the culvert with a motorized trail bridge. This watershed is very prone to flood events that cause large road washouts. After the timber sale here, the road system west of McCoy creek will not be needed and ought to be decommissioned. A trail bridge would provide access to the motorized trail. The trail is not used much and there is an alternate trailhead on the 2809. If there is no funding, maybe having no access to the trailhead is acceptable.
- Culvert with rusted out bottom that will cause a road failure soon.
- Road washouts. I am unsure how many of these make sense to repair because many are deep fill locations that are susceptible to washing out again. The forest should consider leaving the road system as is and considering it decommissioned beyond the current washouts.
- Recently repaired washouts from 2016-17 flood event
- Trailhead for motorcycle trail that climbs up to the Langile Ridge trail. Usage is low due to lack of maintenance.
- Trailhead for Boundary trail. This is a motorcycle trail that has multiple other access points

Kraus Ridge

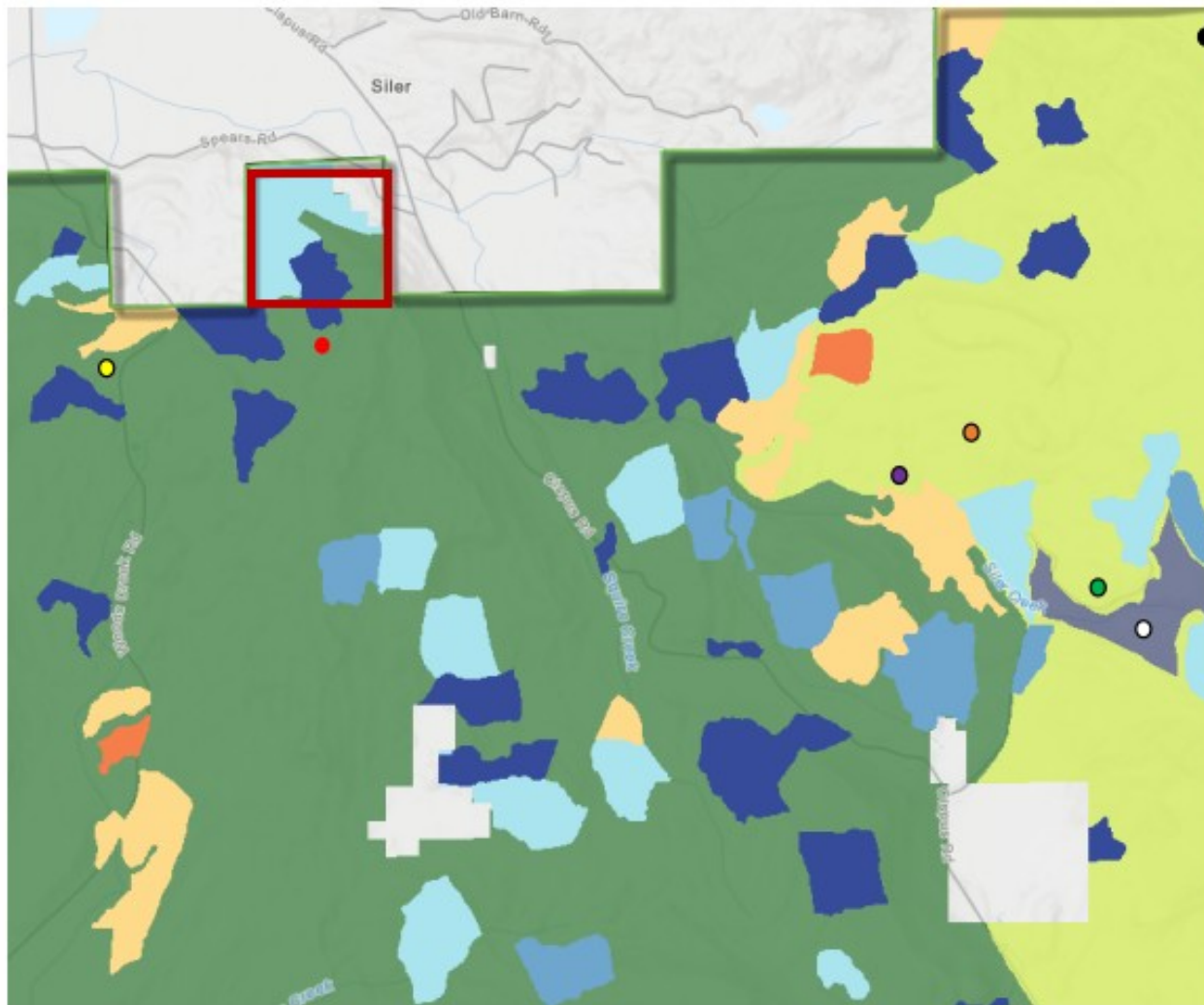
- The Ames and Huff sales are not shown in the completed sales map. This seems like an oversight.
- There are 3 plantations shown on the 2505-022. That road was just closed and stabilized as part of the Huff sale. Why are there more plantations ready to harvest?
- On the 2502-016 there are plantations that were dropped from the Skinner sale. The 016 spur was analyzed for decommissioning. Should those be dropped?



This map shows where I found road mapping errors in this area. The true locations are yellow. I groundtruthed road 2500-612 and the 2502-020 area.

The 2502-020 and 2500-612 do not exist as mapped. They are actually old skid roads built to access wind blown salvage. I believe the 2304-031 is a similar situation but did not ground truth it like the others. I think the 020 spur does exist and is the highlighted portion only. The rest of the 020 and 612 spurs should be deleted from the roads layer to reduce further confusion.

Siler Creek

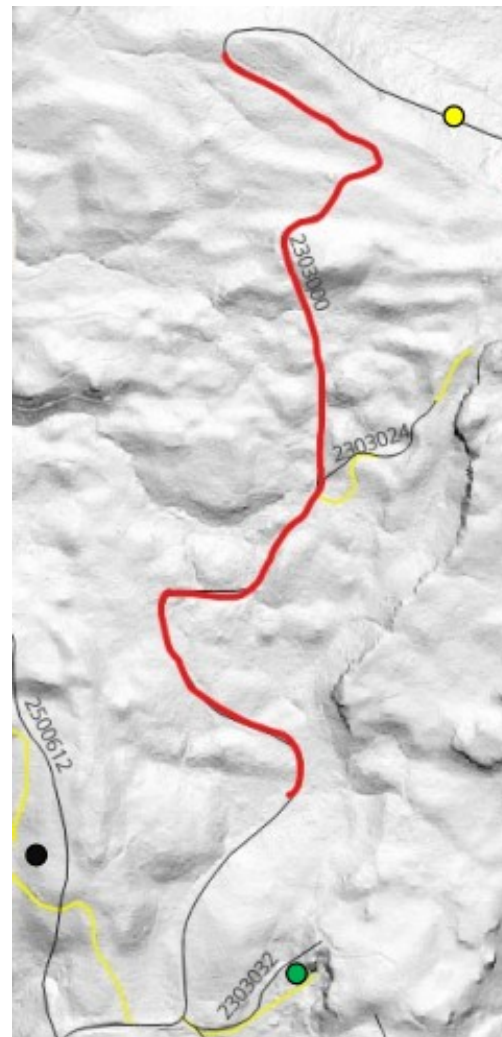


This section of the 2303 rd was built in a very wet area and should be considered For decommissioning.

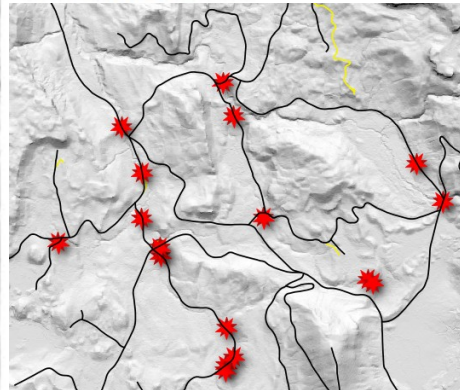
- Just to the east,
- Stand tag 520010 is missing, its origin is 1950.
- Stand tag 528174 is missing, its origin is 1961.
- Stand tag 528074 is missing, its origin is 1961.
- Stand tag 528027 is missing, its origin is 1952
- Stand tag 528516 is missing, its origin is 1952
- Stand tag 528189 is missing, its origin is 1965
- Stand tag 529507 is missing, its origin is 1982
- This stand is not a plantation under 80

The Siler creek area should be prioritized because it has very overstocked douglas fir plantations, is adjacent to a rural community, is a short haul to the mill, there are lots of opportunities for AOP barrier removal, and it is LSR. ML1 roads in LSR should have all of their culverts removed and be decompacted because no further entry will be needed for many.

Siler Creek Continued



- Portion of 2303 that is built through a very wet area. This portion will not be necessary in the future because the area is LSR.
- Landslide location
- Judd Pit. This gravel pit has not been used recently
- The 2500-612 spur should be deleted. It was built as a skid trail



★ AOP Barriers



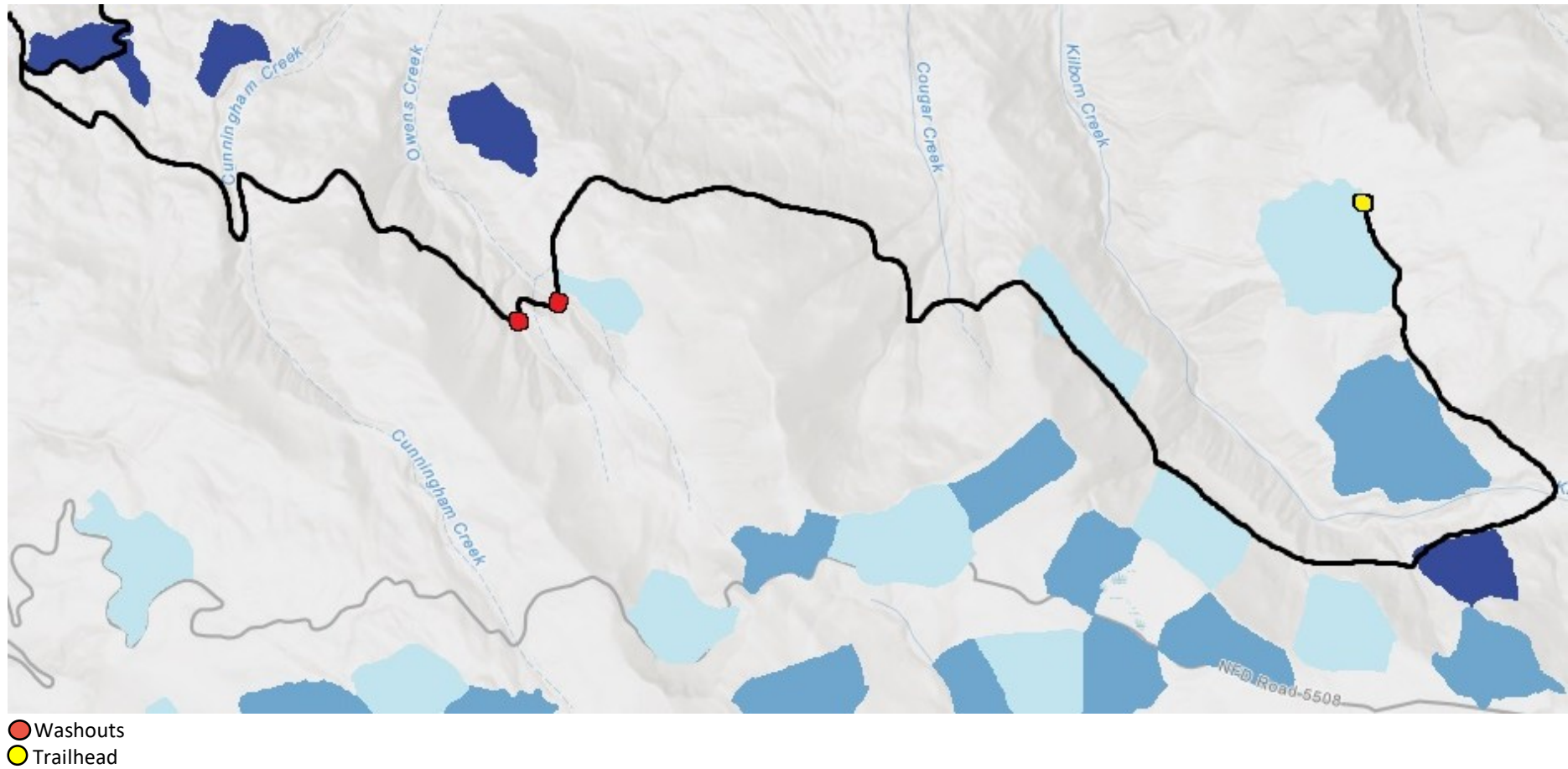
The northern end of the 2303. The landslide is visible to the left. The public created an unsafe path through it. Another portion of the 2303 crosses through the headwaters of Spears Creek and the road surface is cronically saturated with water. I think the 2303 should be closed, stabilized, and decompacted from the forest boundary to Judd Pit.

This AOP barrier on the 2300-065 is one of over a dozen in the Siler Creek watershed.

One priority ought to be the Squire Creek culvert on the 2305. It is rusted out and will fail soon. The road has a buried powerline and accesses private land.

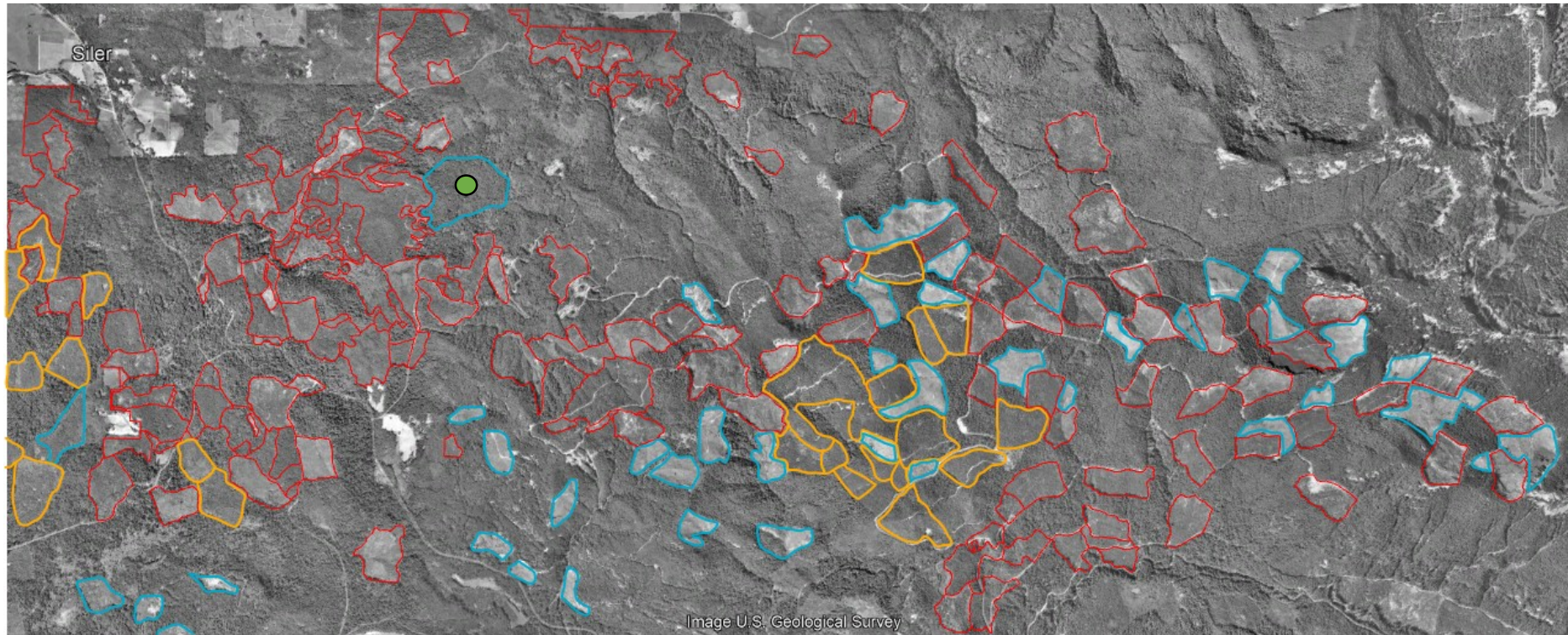


2304 Kilborn Creek



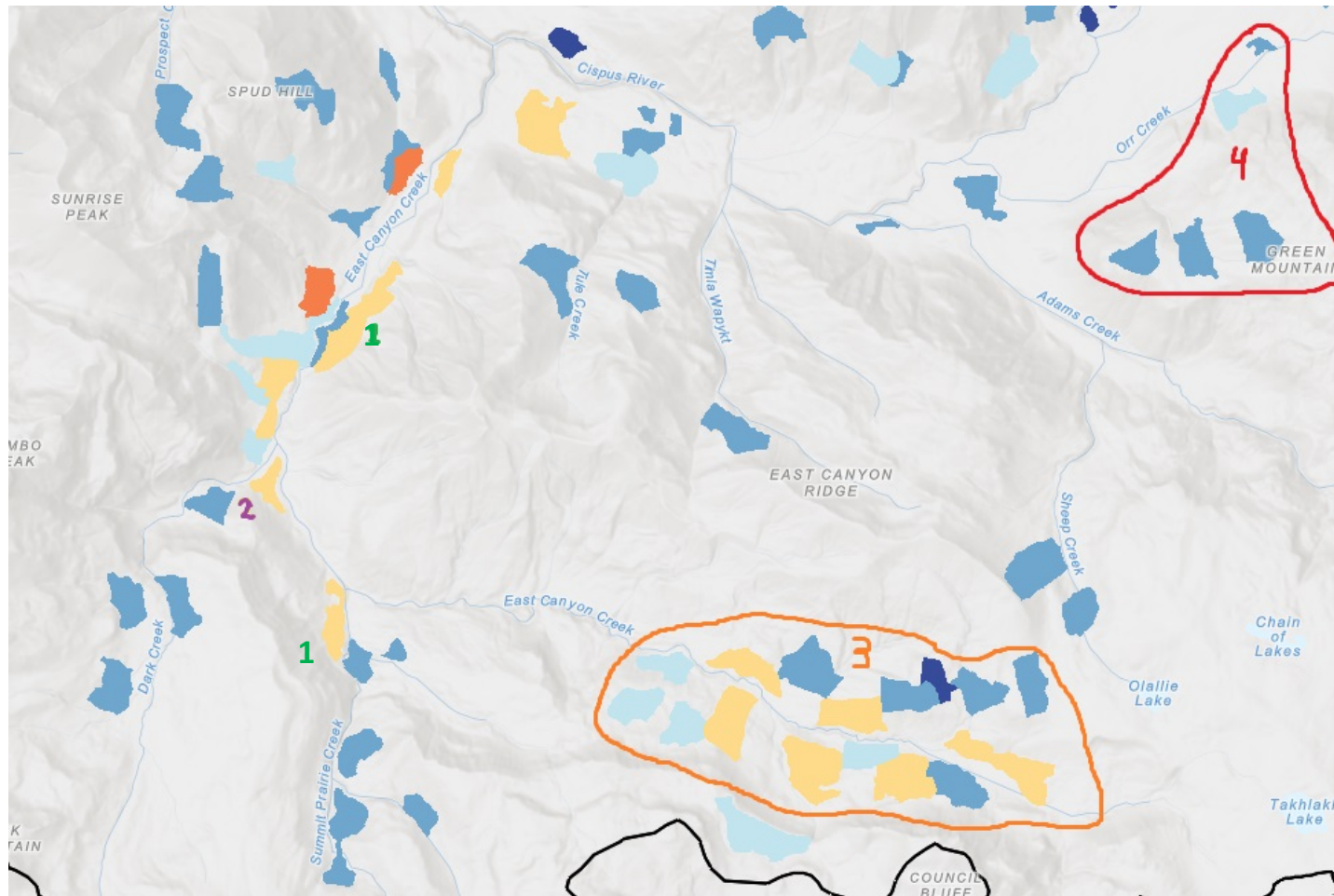
The 2304 should be a priority because it gives access to an area where backburns could stop a fire threatening Randle. There is also a trailhead.

Siler and Killborn Missing Units Under 80



- Stands under 80 layer
- Stands treated under Kraus Ridge and Yellowjacket EAs
- Stands under 80 missing from layer
- Large stand on 2304-030 spur that is of uncertain age, possibly 1940s-50s origin

East Canyon Creek and Green Mountain



1. Stand Tag 539622 does not have access without a long temp road. Is this a good candidate for helicopter logging?

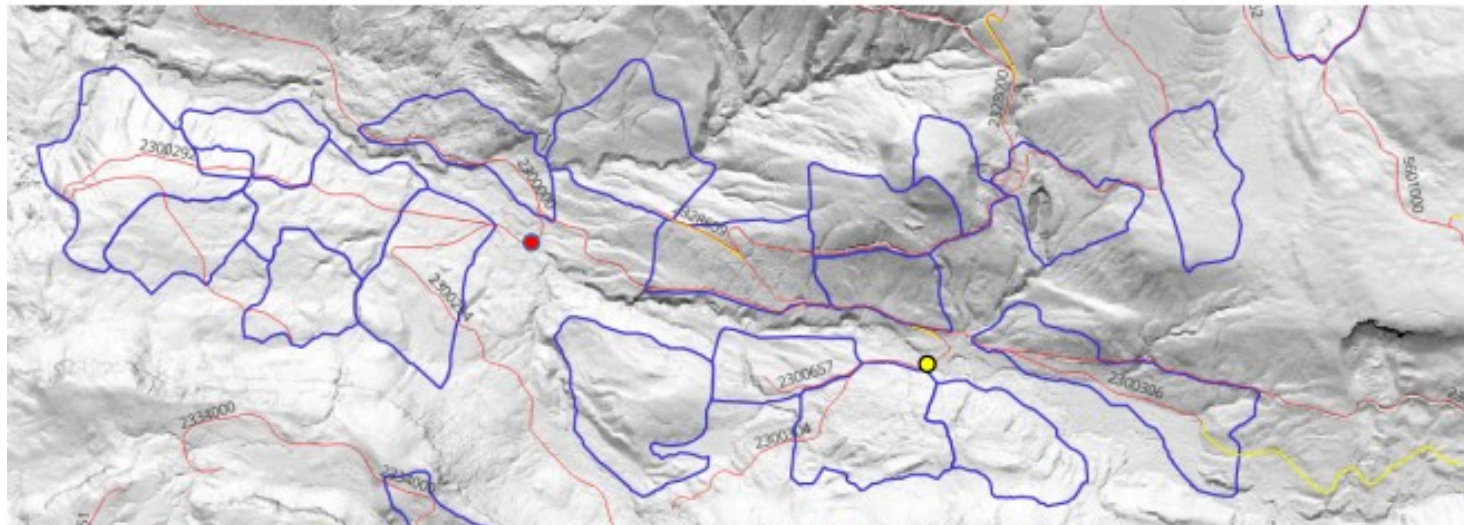
Stand Tag 539464 has a similar situation to the south.

2. Road 2300-245 is decommissioned and there is no crossing over East Canyon Creek. What is the plan for accessing these units? I hope that construction of a new crossing over the creek is unnecessary. Is helicopter logging the best option?

3. East Canyon Creek

4. Green Mountain

East Canyon Creek

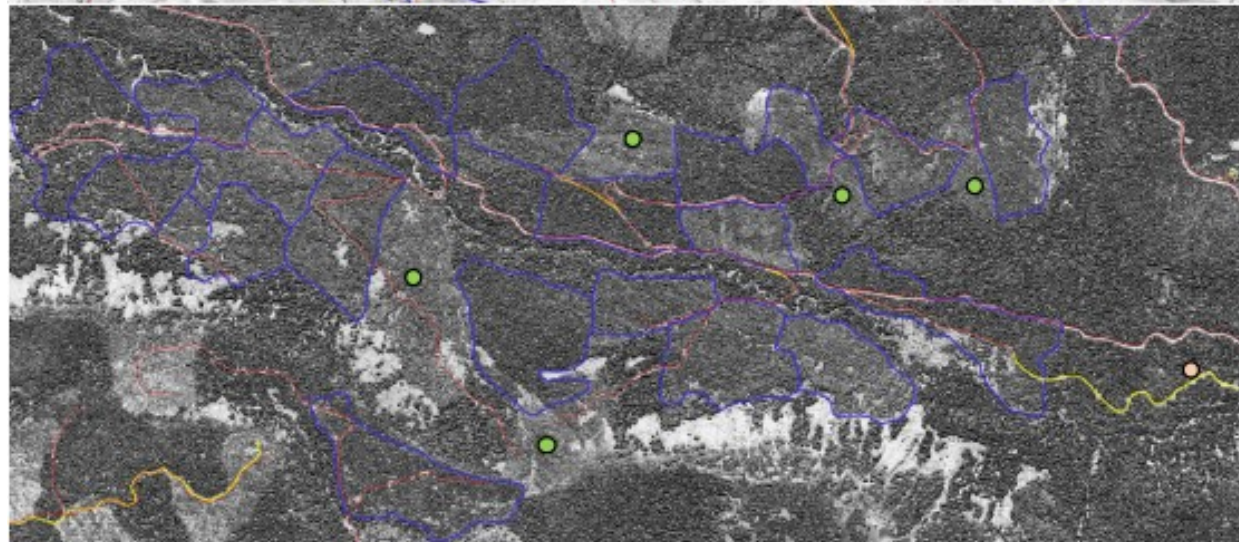


● Road 2300-292

The culvert was blocked and the Creek cut a new channel around it. I would like to see the existing culvert reused for the sale and for it to be removed afterward. I think the rest of the road after the creek should be put into storage.

● Road 2300-304

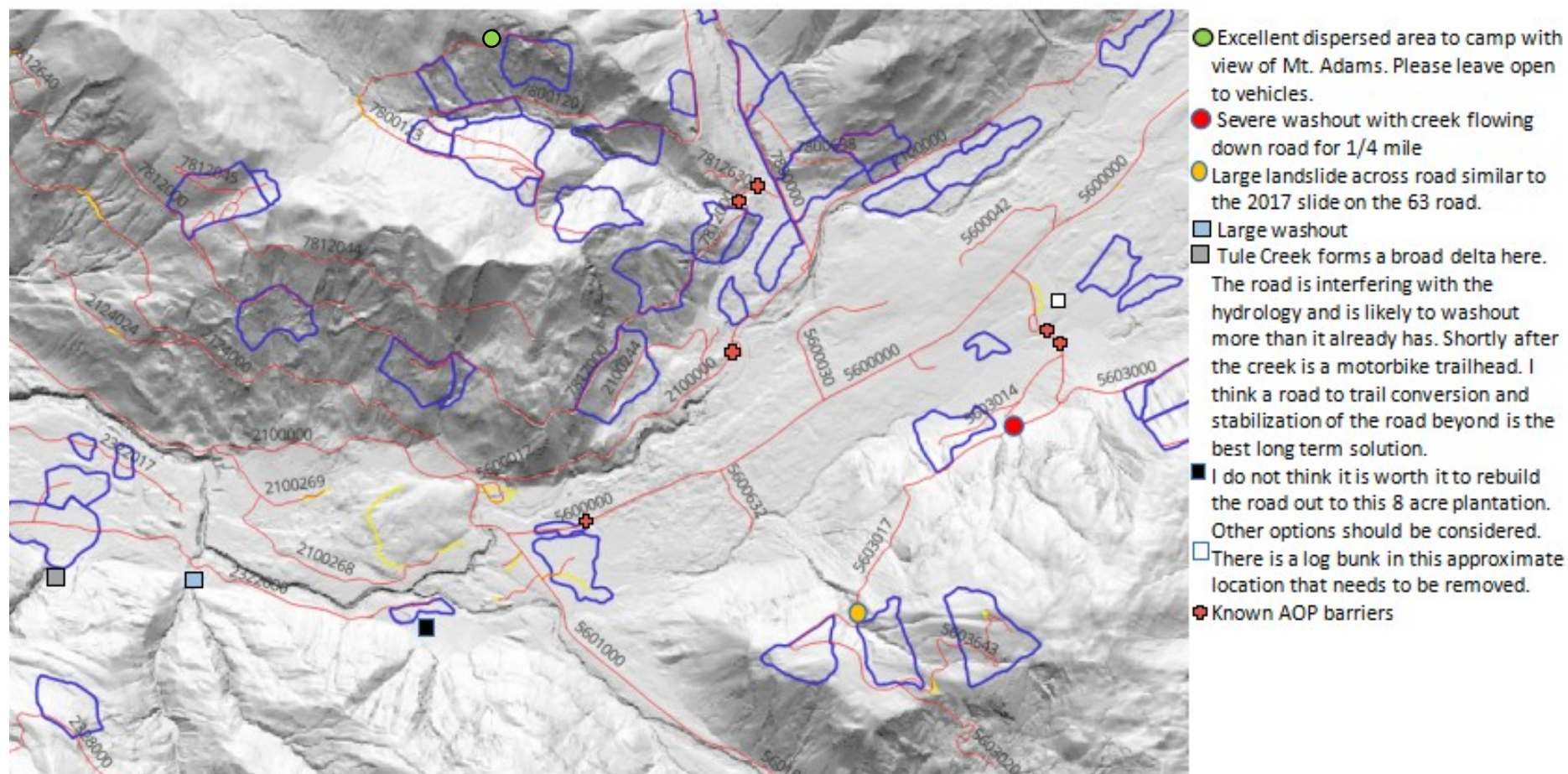
The log stringer bridge is falling off its abutments here. I would like to see it removed and a temporary bridge used for the sale. The road beyond the creek should be put into storage.



Neither the 292 or 304 spurs will be needed for quite a while after harvest and I think removing the crossings will be beneficial for the creek.

- Plantations that likely should have been included. There may be more out the 2328-021.
- The 2300-306 seems to extend to here. Is this a plantation?

Green Mountain



I would like to see an analysis of the pros and cons of decommissioning the 5603017. I do not think it is a sustainable road traversing such steep terrain and it is the only road between Orr Creek and the Horseshoe Roadless area. The end of the road should be a road to trail conversion for the 110 motorcycle trail that starts on the 5601.

Green Mountain Continued



● Severe washout for 1/4 mile on 5603017. An entire creek has been diverted onto the road and joins the next creek to the east.



● Landslide on 5603017

Skate EA

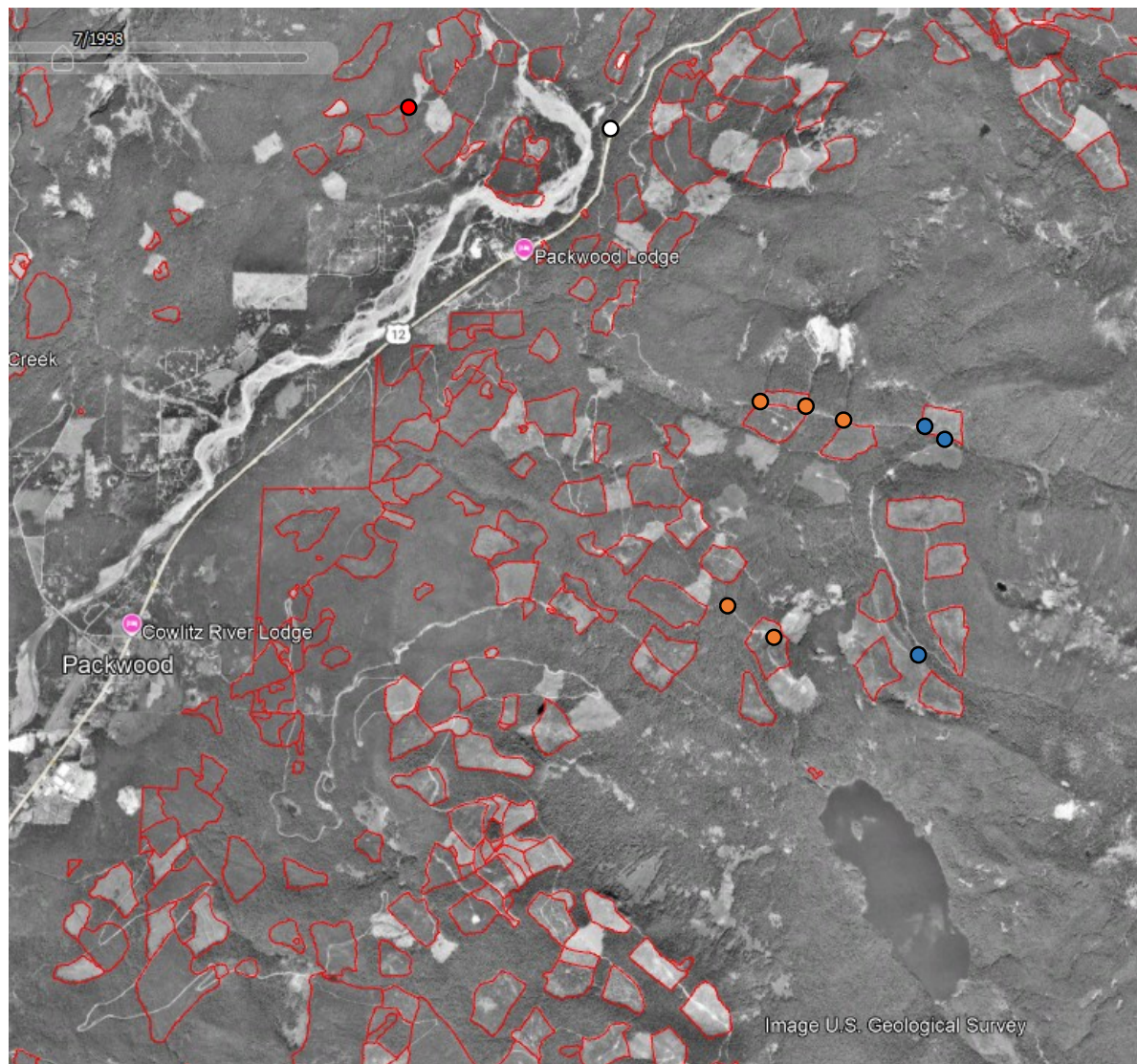
- The Skate EA area should be excluded from this EA. The watershed level analysis is the better way to do planning in the area. There are plenty of other watersheds not on the schedule for analysis that would benefit from this EA in lieu of a more complete planning process.
-

One specific aquatic restoration idea in the Skate EA boundary:

The 2130 should be closed and stabilized after the first crossing of Deception Creek. So much harvest is planned that there should not be a need for the road for a few decades. The road is too remote to justify maintenance so stabilizing it and removing culverts would be the best solution for improving aquatic habitat in the watershed. The AOP barrier culverts for Deception Creek should be used for the sale and removed after. That strategy would be much more cost effective than installing new crossings that the forest will not be able to maintain. New crossings can be installed when future management is needed in the watershed.



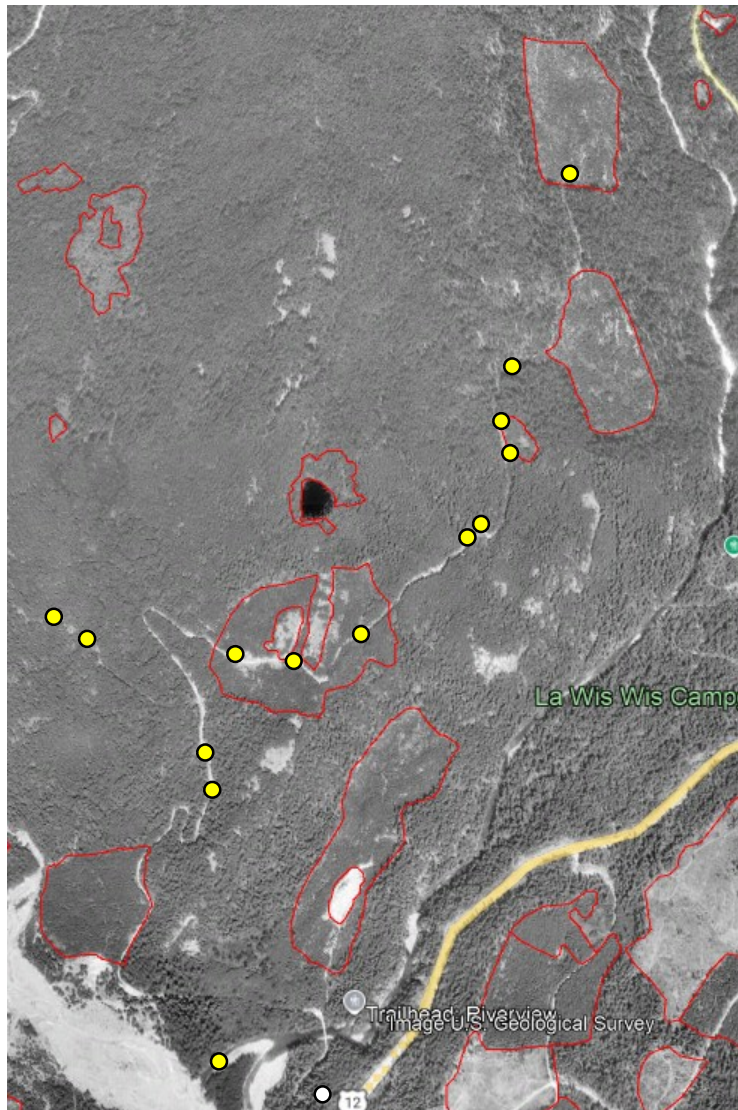
This is the log jam at the inlet of the first 10-12 foot culvert for Deception Creek. The log jam should be removed ASAP to prevent further damage from the road overtopping.



Packwood Area

- Steep drainages burned in the Goat Rocks fire. These culverts are at high risk of washout due to the burn scars above them. Some have already washed out and others are plugged with debris. I would like to see these culverts removed after timber harvest is complete.
- These are the locations of former log stringers that have collapsed or are unsafe to use. I would like to see the road beyond these decommissioned because it abuts wilderness and is not sustainable to keep.
- Jody's Bridge. I would like to see the plantations beyond thinned via helicopter and culverts on road 1270 removed. I am assuming that it is too expensive to ever replace the bridge.
- Location of culvert that needs to be upsized because it is getting plugged with branches and duff. There was quite a bit of damage when the creek overtopped and ran down the ditch causing a rut at the 5290 junction.

This area has severe infestations of scotch broom that were remapped in 2024. Scotch broom increases fuel loading in thinning units so I would like to see a plan to contract out large scale treatments. District staff will not be able to keep up with the growing infestations. Please see Unit 5 of the Skinner sale and Units 17 and 18 of the PRT Stewardship sale for worst case scenarios of scotch broom invasion of thinning units.



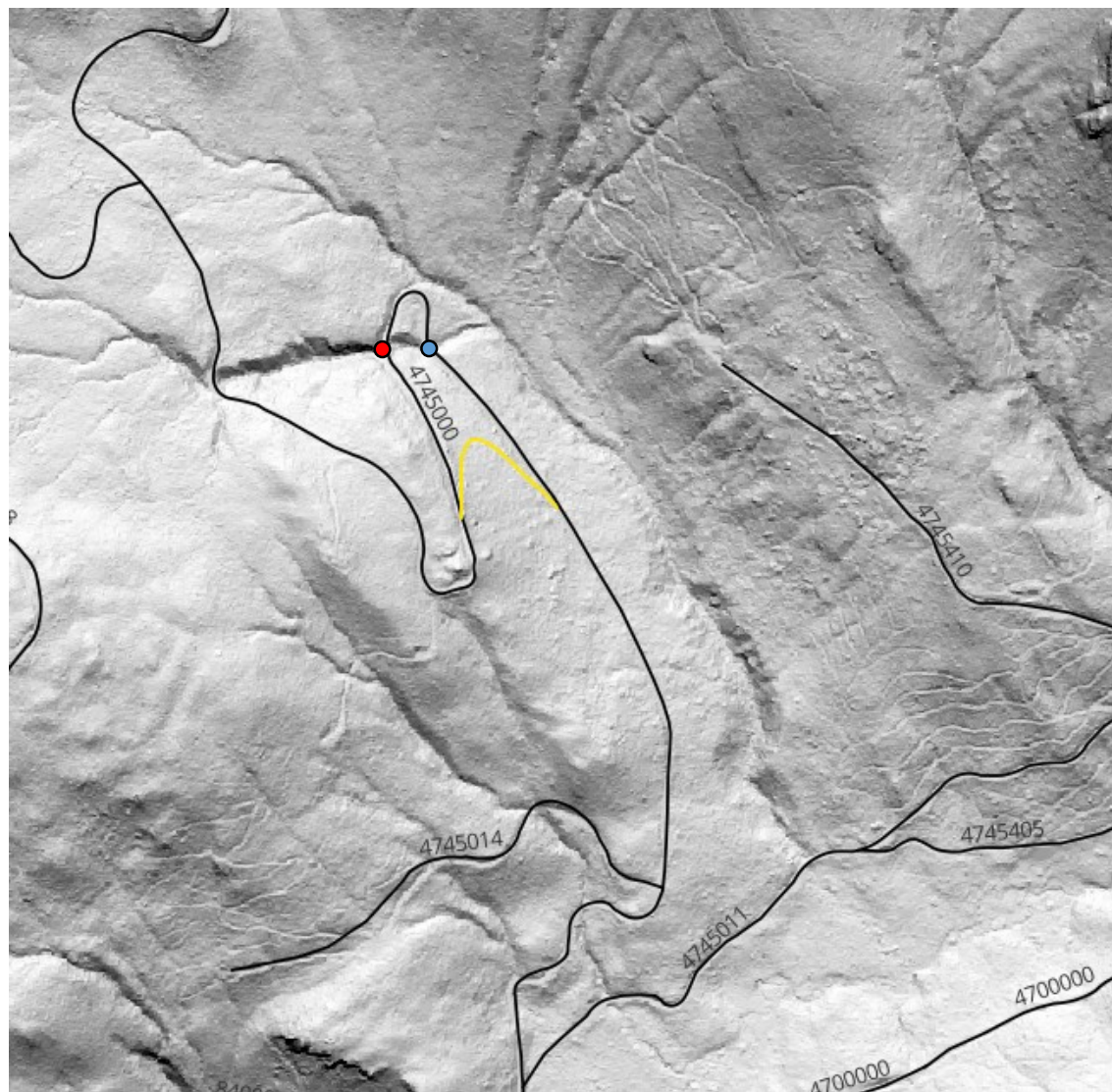
- Culverts identified with LIDAR on 1270 beyond Jody's Bridge that need to be removed



- Culvert that became plugged on 5290-082. I cleared it in 2024 but it needs to be upsized.

Silver Creek, Big Creek, and Willame Watersheds

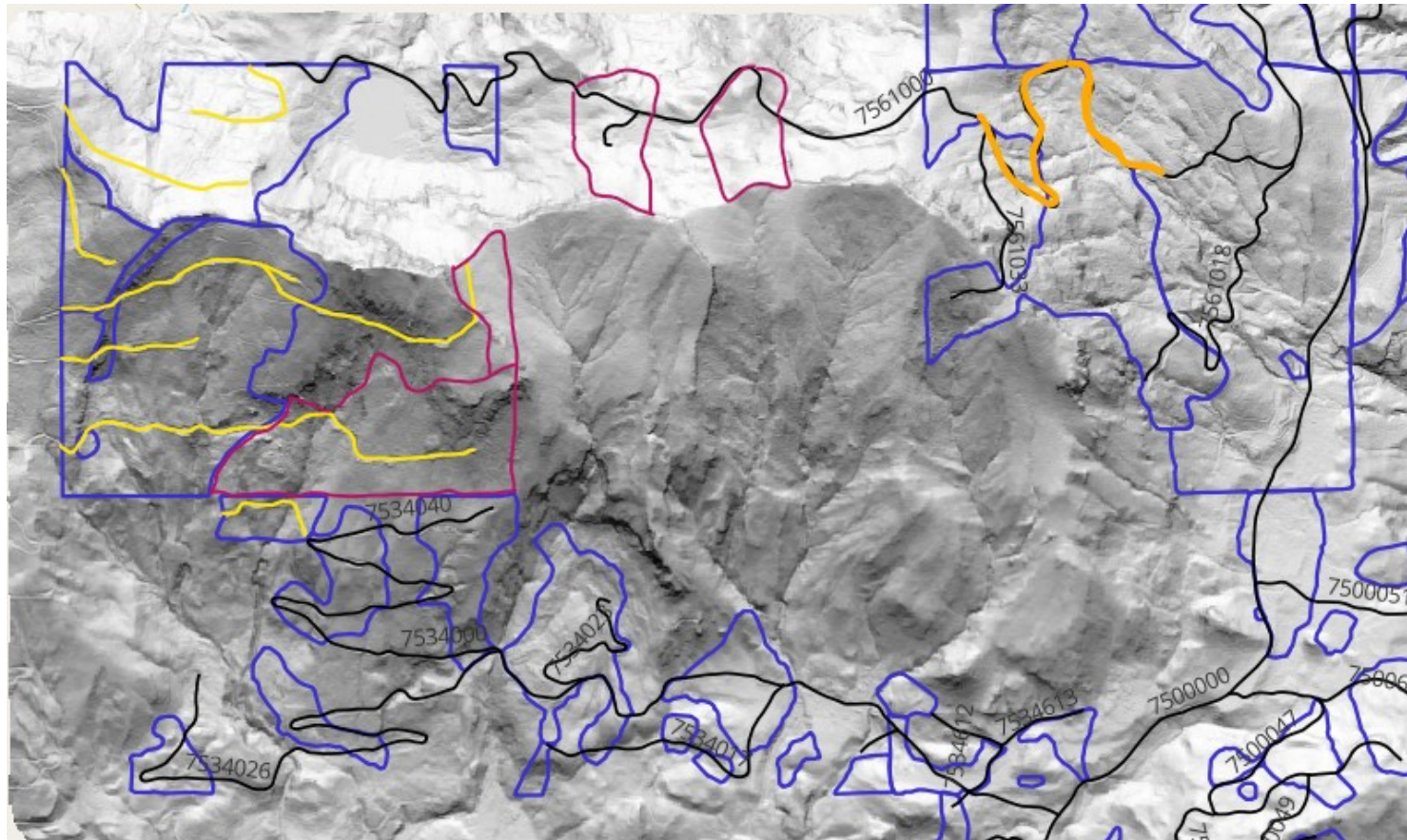
- Road densities need to be reduced in these watersheds, please close and stabilize spurs with high aquatic or other risks. Please keep open lower risk roads for dispersed recreation.
- The 85 through the Lynx Creek headwaters and the 8440 as it climbs to the High Rock trailhead need to be reconstructed for public safety. Both areas have many plantations. There needs to be a plan to treat the scotch broom and spotted knapweed in the area.
- Please fold in the work that was never completed on the breached sales in the area, especially from the Willie and Lynx sales.
- Please replace all undersized culverts on the 63 road, it is an important connector road that the public uses.
- Please reconstruct the 4745 creek crossings and/or consider rerouting it to a more sustainable route. See below.
- Please remove the boulder where the 4725 arch culvert was recently installed, its placement just downstream causes eddies that damaged the retaining wall.
- Please decommission the 7561 enough to keep the public from causing resource damage.
- Please fix the road mapping around Watch Mountain. It was not completely updated after the land exchange.



4745

- Possible reroute of 4745
- Plugged culvert where creek diverts into ditch
- Culvert that was over 60% plugged before I cleaned the inlet in 2024

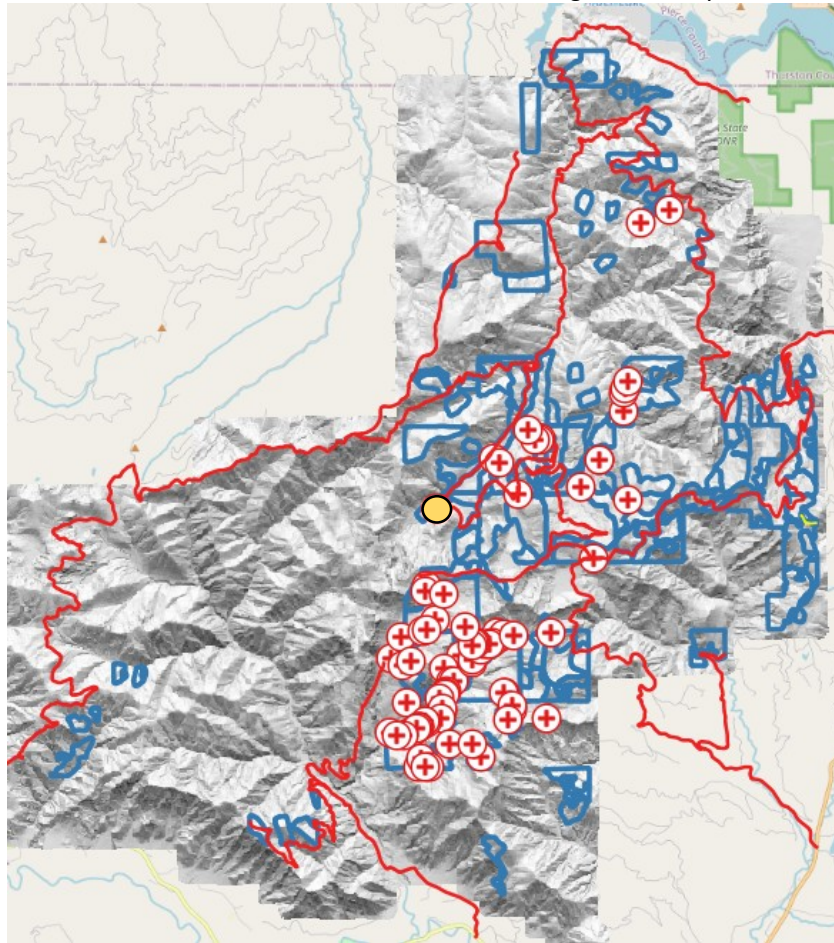
Watch Mountain Area



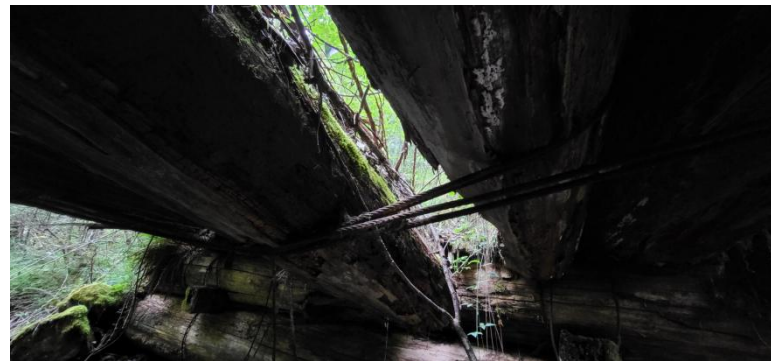
- Unmapped roads from land exchange
- Unmapped stands under 80
- Extremely steep portion of 7516 that OHVs are using to reach Watch Lake and private land.

Mineral Block

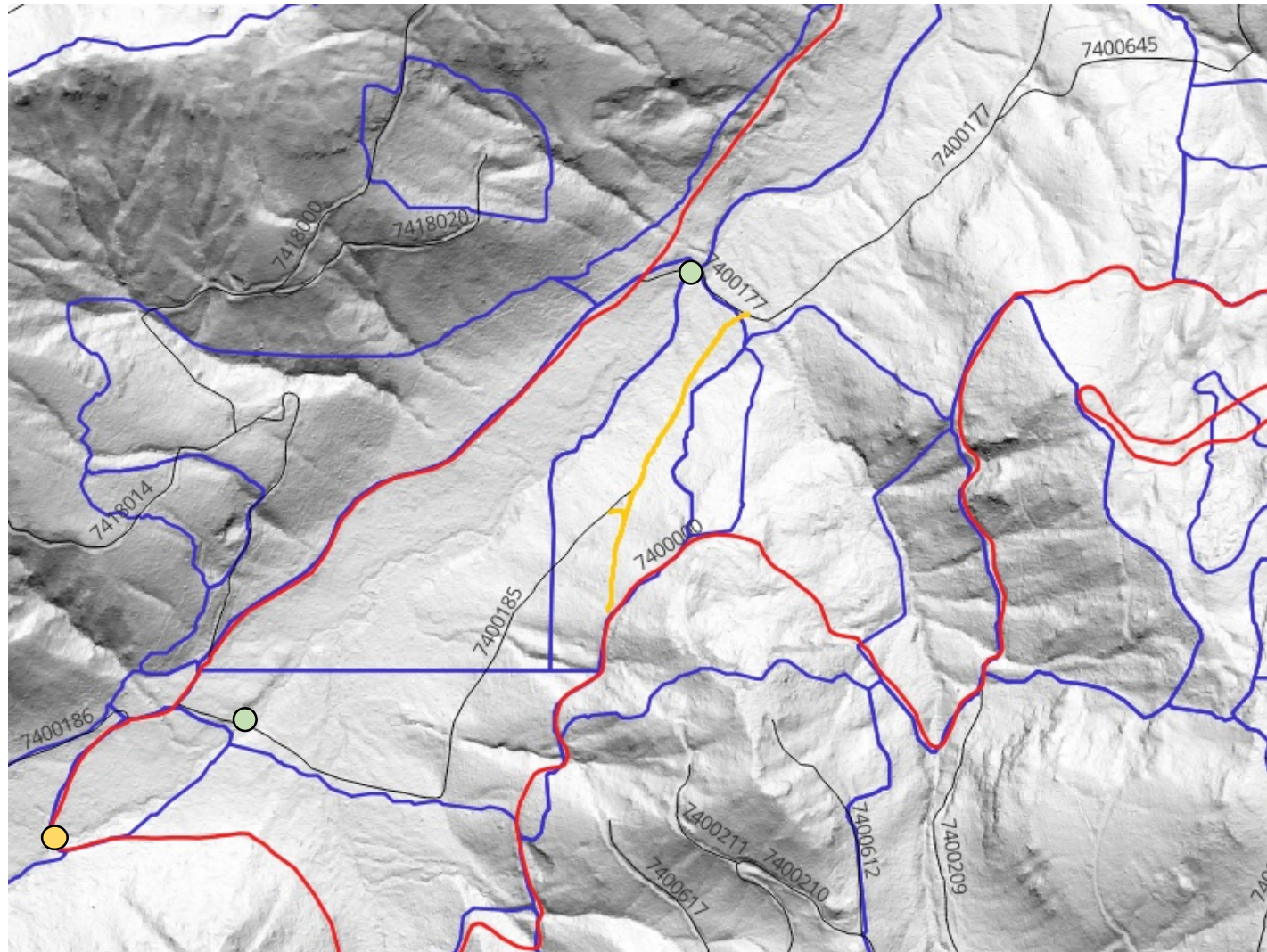
There are so many access issues and innacurate data for the mineral block that I think it should be excluded from this EA. It is also the next area scheduled for analysis after the Skate EA. A lot of road decommissioning needs analysis since this watershed is all LSR. Public access needs to be reestablished on the 7400 and 7200 ROWs.



-  Moderate to severe washouts observed via lidar.
-  Primary roads that are currently drivable, almost all others are grown in or washed out.
-  Stands under 80 layer. Some of the stands data is innacurate and many are missing.
-  Failed bridge that needs replacement ASAP. It is a public safety hazard because the public keeps removing the barriers blocking it.



Mineral Block Continued - West Fork Little Nisqually

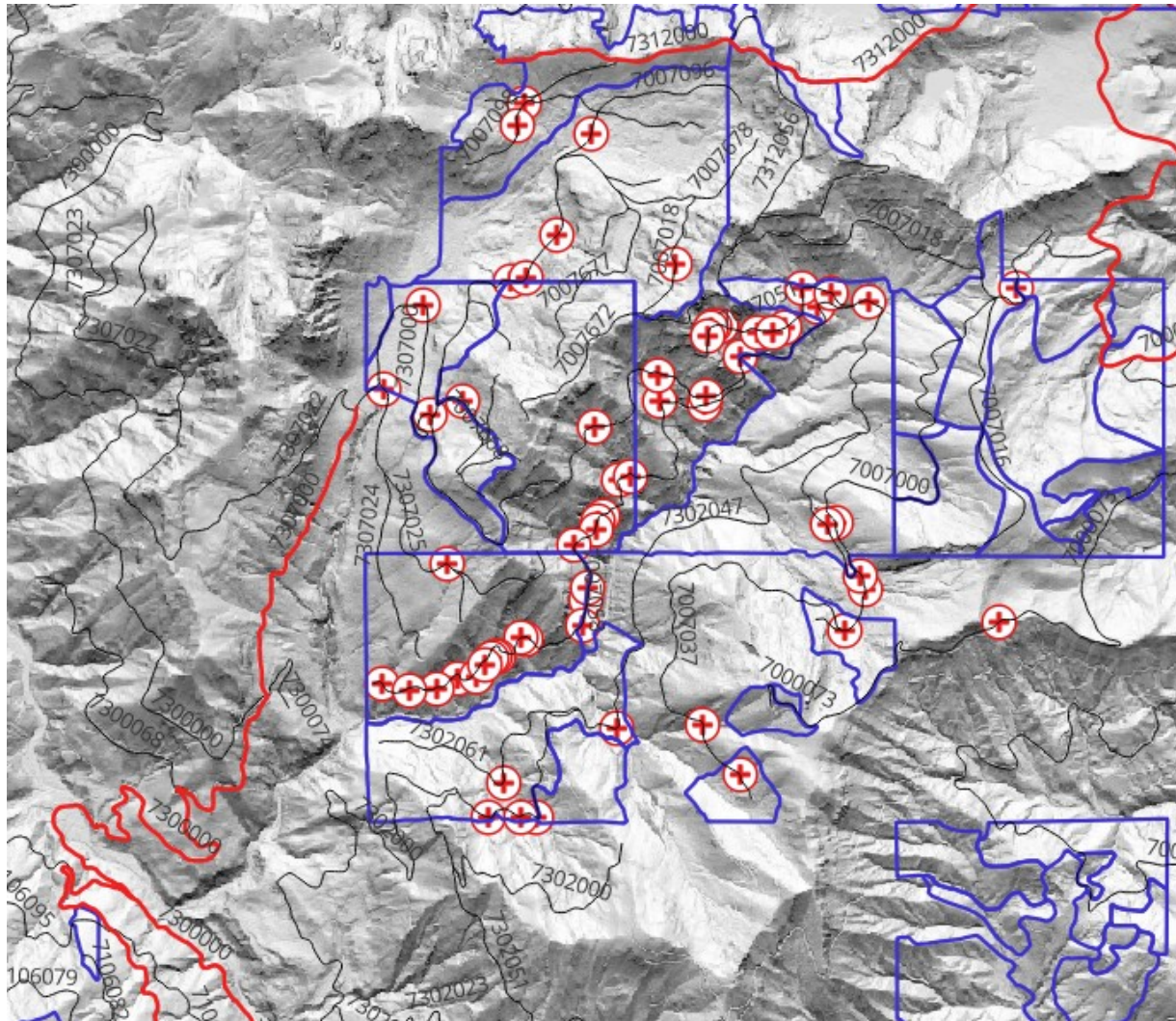


- Failed bridge, see above
- Recovered riparian crossings that can be avoided
- Good location for temp road to avoid rebuilding riparian crossings
- Primary roads that are currently drivable, almost all others are grown in or washed out.
- Stands under 80 layer. Some of the stands data is inaccurate and many are missing.



Mineral Block Continued - Lower Little Nisqually

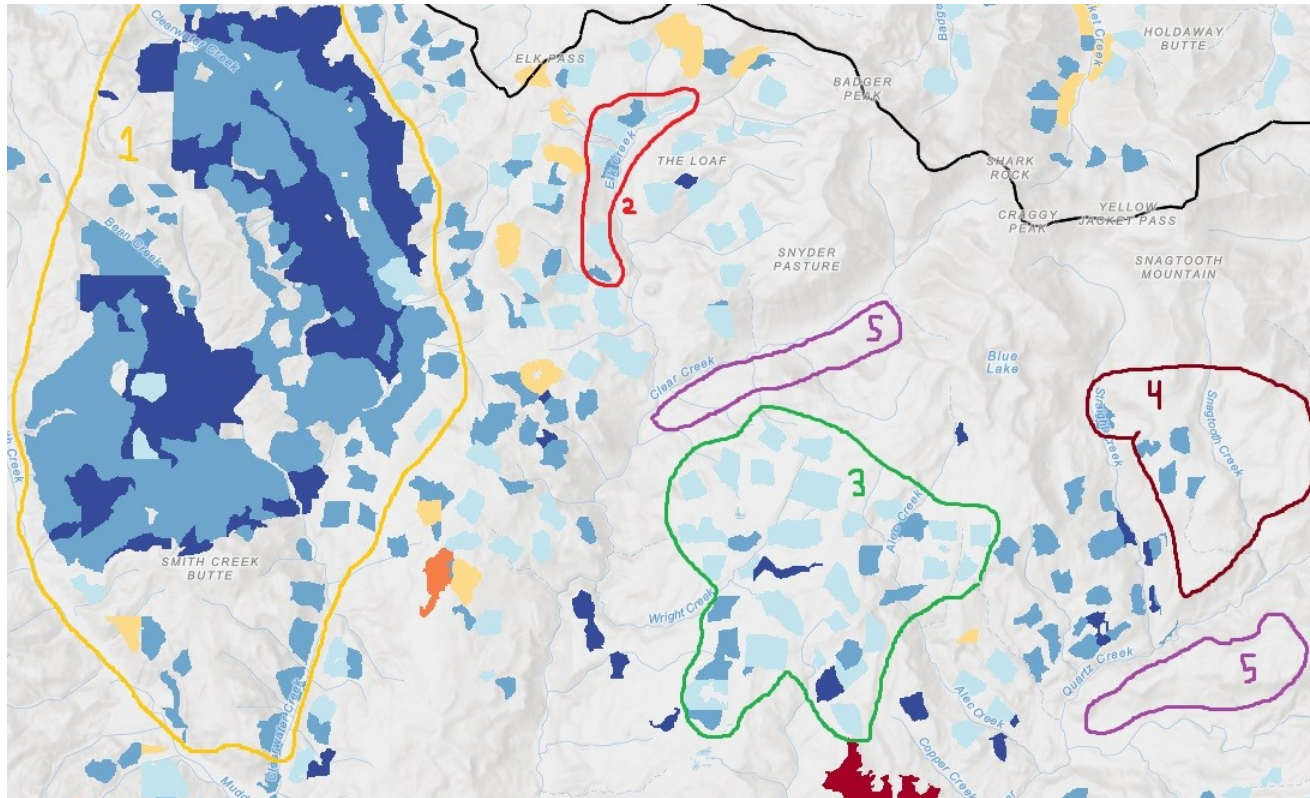
- I have highlighted plantations that are not in the stands under 80 layer and are not proposed stands in this EA. The imagery is from 1994.
- The North Fork Tilton watershed also has stands that need to be analysed that are not in the stands under 80 layer.
- Stands data desperately needs to be updated alongside roads data to allow for more complete analysis in future EAs.



Mineral Block Continued - Tumble Creek

- Extensive analysis and groundtruthing is going to be needed for the Tumble Creek watershed.
- Sections 5,6, and 7 were heavily logged because at least two of them were in private ownership until a land exchange in the 1980s.
- The 1996 flood washed out the majority of the creek crossings in this watershed.
- Most of the road network in this area should be decommissioned because it is all LSR.

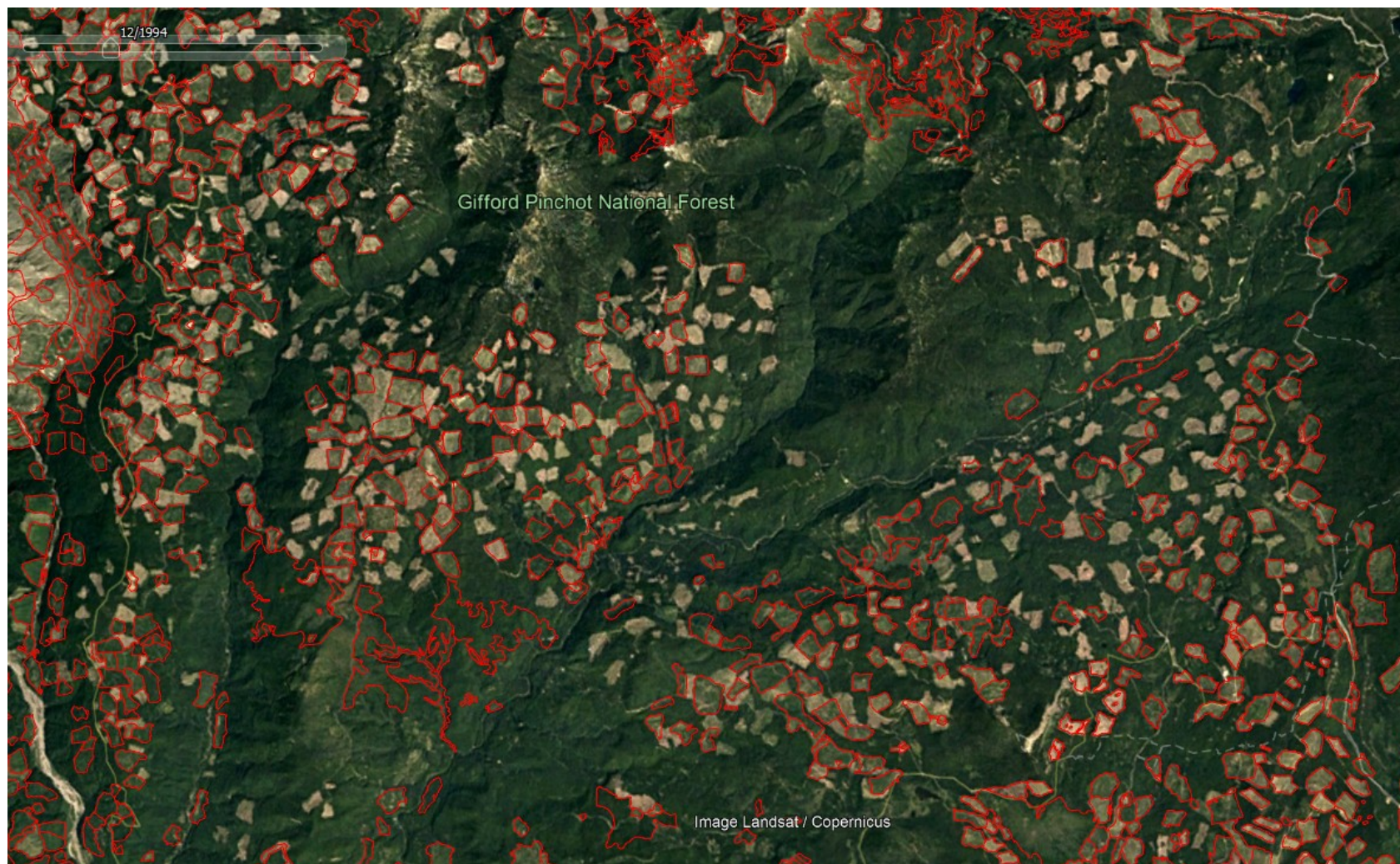
Area North of Lewis River



1. The Clearwater watershed was going to be covered under the Pool EA. I think the complexity of the area would be better analysed in a watershed level analysis. I would like to see the ridgetop roads become ML2 to allow public access
2. The 2559 along Elk Creek traverses steep terrain and crosses multiple large creeks. Because the area is LSR, I think this road should be decommissioned after the 100 spur. The old bridge abutments and approaches at Elk Creek on the 100 spur should also be removed from the riparian area.
3. This area should be a priority for commercial or precommercial thinning to improve the huckleberry habitat.
4. This area that is blocked by a landslide on the 9341 needs to be analyzed for either reestablishing public access or decommissioning.
5. These areas have plantations that do not appear in the stands under 80 layer. Area 4 also has more stands.

- A major culvert upgrade is needed where the 93 road crosses Platinum Creek. Large woody debris is getting caught at the inlet. I think that a box culvert would be the best option to allow the wood to pass through during storms.
- Culvert upgrades are also needed in the Spencer Creek headwaters. The 93 road is an important corridor to stormproof.
- *Lathyrus sylvestris* needs to be treated along the 93 road to prevent its spread. It has heavily infested the Quartz Creek trailhead.

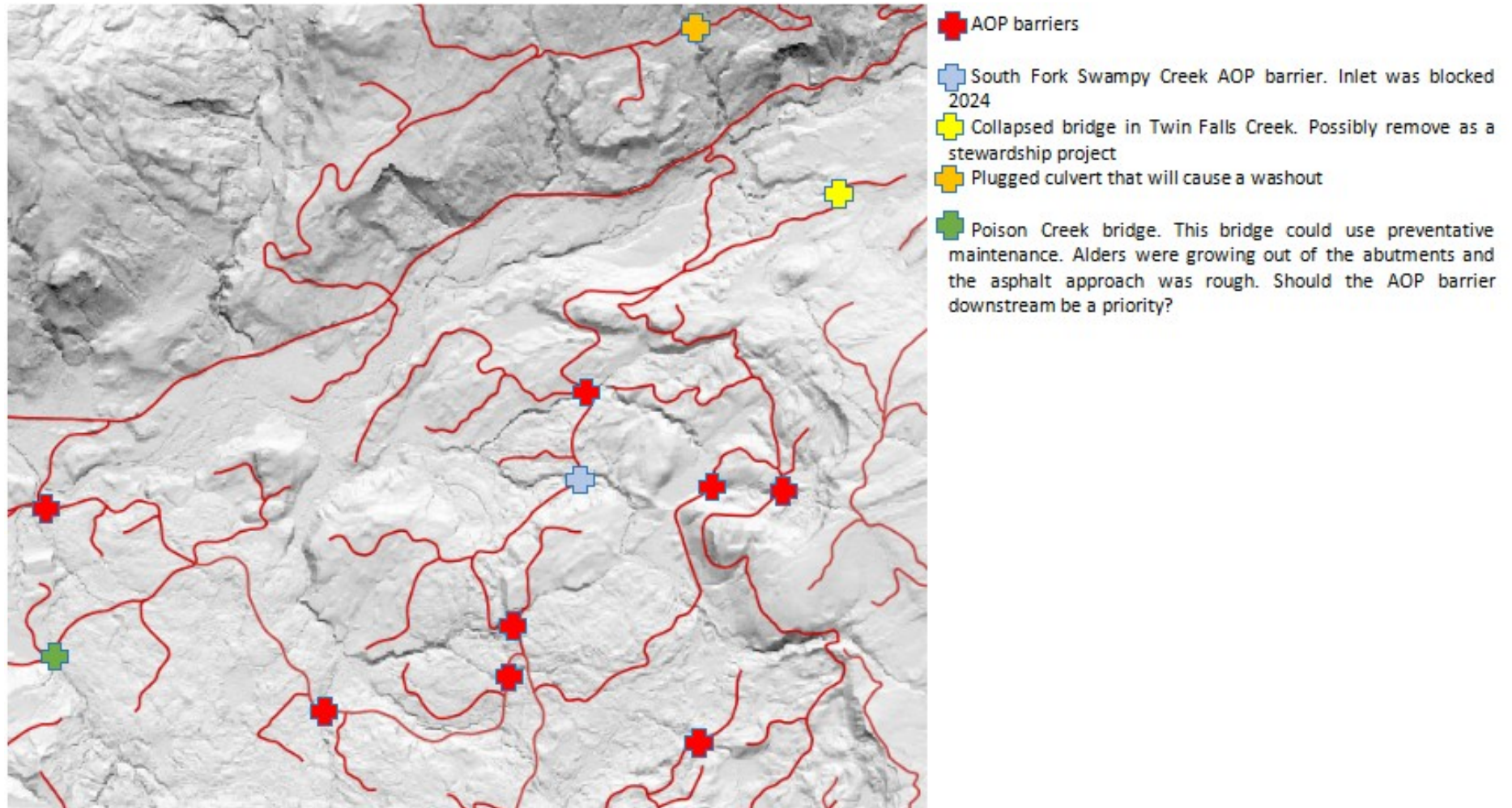
1994 Imagery of Lewis River showing how many Plantations are Missing from Stands Under 80 Layer





Culvert inlet where the 93 road crosses Platinum Creek. I removed some of the woody debris after taking this photo but the culvert is clearly not adequate for the location.

Pass Creek, Swampy Creek, and Twin Falls Creek Watersheds





Plugged inlet at South Fork Swampy Creek. Arrow is pointed at inlet.



Collapsed bridge in Twin Falls Creek