



August 18, 2025

Johanna Kovarik, Forest Supervisor
ATTN: Objection – Forest Wide Thinning and Potential Control Lines
987 McClellan Rd.
Vancouver, WA 98661

RE: Forest-Wide Thinning and Potential Control Lines 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 Draft EA, which are hereby incorporated by reference.

1. The use of variable density thinning using “skips and gaps” on Matrix Land Allocations.

AFRC submitted written comments in response to the Draft EA and identified our concerns with the use of variable-density thinning on Matrix lands. This included concerns about the future ability of the Forest Service to meet the commercial timber production goals.

The Final EA States:

Proposed treatments for plantation thinning units would include variable density thinning of previously regenerated stands less than 80 years old at time of award of a timber sale or stewardship contract. The proposal only applies to stands that were previously regeneration harvested and does not apply to stands less than 80 years old that were generated through a natural disturbance (primarily wildfire, blowdown, or insect and disease). Variable density thinning relies on different residual densities, unthinned areas (skip) and openings (gaps) to promote a heterogenous stand (Franklin et al. 2018, Brodie and Harrington 2020). Variable density thinning would include thinning across all tree size classes but would primarily remove smaller diameter trees. This thinning method is a restoration tool that can accelerate development of old-growth forest structure in plantations and increase landscape habitat connectivity (Spies et al. 2019).

While we understand the Forest’s response to our comment, it identifies that the use of variable density thinning does not preclude future treatments on Matrix Lands that are aligned with the sustainable production of saw timber. However, the underlying concern about using “restoration tools” to create late seral structure on Matrix Lands continues to risk the long-term sustainable production of saw timber that our members rely on.

Resolution Requested:

AFRC requests that the Deciding Official clarify that there is no intent expressly made or implied that the treatments Matrix Lands is for the development of Late Successional characteristics that would limit or eliminate the future sustainable production of saw timber.

2. Focusing Regeneration Treatments on Huckleberry Production

AFRC submitted written comments in response to the Draft EA and identified our concerns with focusing regeneration treatments on huckleberry enhancement areas. This included concerns about the quality of timber produced, the economic impact to the project from lower quality timber, and the future ability of the Forest Service to meet the commercial timber production goals.

The Final EA States:

These treatments would be focused on areas with huckleberry enhancement potential, areas with potential to improve forage for ungulates, insect and disease infestations, and/or to improve habitat for other early seral obligate species like pollinators in watersheds where high quality early seral habitat is lacking.

While we understand the GP’s response to our comment is that Huckleberry Enhancement is but one goal, the Final EA continues to imply that Huckleberry Enhancement is the leading goal for

the use of regeneration harvest in this project. We are not explicitly opposed to treatments for Huckleberry Enhancement; however, we believe that 'Forest Health and Resilience' should be the primary factor in the use of regeneration treatments.

Resolution Requested:

AFRC requests that the Deciding Official clarify that there is no implied or explicit priority of the reasoning used for the determination of implementing regeneration harvest. Additionally, while the goal is to enhance the presence of late seral habitat, steps will be taken to ensure the sustainable production of saw timber in the future.

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 stylized with a large, sweeping initial 'T' and a cursive 'J'.

Travis Joseph
President