

October 5, 2026

To District Ranger Gassmann:

The following are comments pertaining to the Swamped Project.

Proposed Vegetation Treatments –

- Unit 108 - the portion of the unit that lies north of Teepee Creek Road to our property line. This portion of the unit has an old growth component of large diameter larch, Douglas-fir, spruce, cottonwoods and some cedar. This area is unique in the Teepee Creek drainage with this species mix and the fact that a majority of the old growth also lies within or adjacent to a seasonal wetland. All species of wildlife have been seen in this area as well as on our land. Moose, elk, deer, and black bears are frequently observed along with grizzly bears. One grizzly actually spent the night in our field 200 feet from the house in 2007.

The water source for the wetland starts on our property and flows south onto Forest Service (FS). The seasonal wetland on our property is approximately 11 acres and the wetland does not stop at the property line. Refer to the photo below.



This seasonal wetland that lies on our property and FS, in a normal year has standing water through the spring and early summer. The water table is high throughout the area and even a moderate amount of rainfall will bring water to the surface and fill potholes and low areas. (The rain we had two weeks ago was enough to have standing water on FS where the current unit boundary is flagged) The wet area on FS extends almost all the way to Teepee Creek Road and flows on both sides of the railroad (RR) grade. Prior to the reconstruction of HWY 2, water from this wetland flowed out onto the highway at about the junction of Schreiber Creek Road and the highway.

The current layout of this portion of Unit 108 includes the wetlands. The flag line crosses right through the southern end of the wet area with cottonwoods (this is the area that is easily seen on the aerial photo).

With the abundance of resource values (wildlife, wetlands, old growth, wildlife travel corridor and security) we would like to see this area dropped from any treatment. We are aware of the down woody in this area but the down material does not seem to impede wildlife use but rather promotes its use. With the number of treatment areas laid out along the Teepee Creek Road and HWY 2 this is one of the few areas that will provide some wildlife security and a travel corridor. The photo below shows the area we would like to see dropped from Unit 108. The boundary may move a bit depending upon the actual location of the wetland and the location of old growth. The boundary could be located in such a way to include some of the springboard stumps that require protection to be outside the cutting unit.



Excluding this area from treatment does not pose an unacceptable fire risk. The area is naturally wet and green most of the summer, plus the remainder of Unit 108 lies along the boundaries of this excluded area and Unit 133. (There was also a corner for Unit 24 in this same area -where did Unit 24 come from?) In addition, this area has easy access from HWY 2 and Teepee Creek Road, and with Schreiber Lake as a water source a $\frac{1}{4}$ of a mile away.

- Unit 133 – this cutting unit is designated as an Improvement Harvest. I tried contacting the District Silviculturist to get the actual marking guide/residual leave tree density for this unit. I was not able to make contact within the short period of time that was available to make comments on this project. Therefore, I made some assumptions based on my previous experience working in similar stands. In Unit 133 leaving an average of 60 square feet of basal area (BA) would be appropriate. (I am assuming the guides would use BA as a guide for selecting leave trees.) Figuring an average leave tree with an average diameter-at-breast (DBH) of 14 inches (this is being generous, not much of this size timber) a 60 BA would be approximately 56 trees per acre (TPA) or an average spacing of about 30 feet between leave trees. I did not see much of this size

leave component in the stand, and a lower leave tree density would push this unit towards a shelterwood prescription. In addition, the timber to be removed was mostly smaller diameter Douglas-fir. I suggest that the FS review this unit as to the feasibility of being an improvement and harvested with a skyline. (To be fair I didn't have time to walk the entire unit so the stand condition described above may only be reflective of area I saw.)

- Units 108 and 110 - between Teepee Creek Road and HWY 2. There isn't any buffer flagged on the portion of Coyote Creek that flows below the Teepee Creek Road nor was there one identified on the Project Area map. The portion of Coyote Creek above the Teepee Creek Road has a deeply incised channel for its entire length. The channel itself is a mellow grade, so the channel being as incised as it is indicates that this section of the creek flows a lot of water for a portion of the year.

That amount of water flow did not stop at the road as might be indicated by a lack of streamcourse buffer below the road. So where did all this water go? All you need to do is look at the scour on the outlet of the culvert and follow the channel. The channel is hard to find in places because it was skidded through at one time and runoff may go below ground in sections of the creek. But if you look around you will find a definite scoured channel and at another location where a diversion was dug. The flag line for the common boundary between Units 110 and 108 actually crosses the channel. Refer to photo below showing the channel.



The map for the Proposed Action (PA) does not show a buffer for a streamcourse in this area. So was the unit reconned to verify the prescription and to find other resource

concerns during layout? Better yet how did this get missed if the area was reconned prior to scoping the PA?

- Time Frame. The EA states - "Implementation of project activities is expected to begin in the spring or summer 2027 and last up to 20 years for harvest treatments and an additional 5 years to complete harvest associated treatments, the other proposed vegetation treatments, and other activities like road work." If implementation of this project is going to span 25 years, why isn't there any schedule of activities and priority of treatment areas by year displayed in the EA?
- The Project Design Features listed in the EA should be site-specific and tied to a specific activity. The design features listed for soils are very site-specific and detailed – other resource areas should take note. Design features are instrumental in guiding on-the-ground implementation and ensuring that the timber sale contract includes all the mitigation measures stated in the design features.

The time frame to review this project is very condensed considering the acreage involved. The Swamped Project has been out of the public eye since it was first scoped in 2020. It would have been helpful to have better, updated maps and information available for review. Seeing how a good portion of the project has been laid out and traversed since 2022 you could have provided updated maps and any changes in logging systems and unit prescriptions that were ground verified during layout. Since it has been 6 years since the initial scoping period it would seem appropriate to have rescoped this project and address any changes within the project area, such as the effects of the wind storms and flooding this past December and March.

Thank you for the limited opportunity to make comments.

Signed – John Craig