



VIA Email: comments-pacificnorthwest-mthood-hoodriver@fs.fed.us

August 10, 2018

Amber Sprinkle
Mt. Hood National Forest
16400 Champion Way
Sandy, OR 97055

Dear Amber:

On behalf of the American Forest Resource Council (AFRC) and its members, thank you for the opportunity to comment on the Waucoma Huckleberry Enhancement.

AFRC is a regional trade association whose purpose 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 protection of all forest lands. Many of our members have their operations in communities within and adjacent to the Mt. Hood National Forest and management on these lands ultimately dictates not only the viability of their businesses, but also the economic health of the communities themselves.

The Waucoma planning area includes approximately 7,305 acres located at the northwest corner of the Hood River Ranger District. This area is bordered to the north and west by the Columbia River Gorge National Scenic Area and the Mark O. Hatfield Wilderness respectively; and to the east and south by non-Forest Service System Lands. The planning area boundary includes parts of the Lower West Fork Hood River watershed, and Green Point Creek subwatershed.

The Waucoma planning area was identified as an area of emphasis for huckleberry enhancement because of the existing ecological site potential and past cultural interest. The planning area contains a concentration of Pacific silver fir plant communities unique for the eastside of the Cascades. Huckleberry habitat is consistently found in a variety of stand conditions and stages within these Pacific silver fir communities. This cluster of huckleberry habitat has drawn berry pickers to the area for centuries, if not millennia. The proposed project planning area is located within the ceded lands of the Confederated Tribes of the Warm Springs Reservation of Oregon and remains an important part of the Tribes heritage and culture.

AFRC supports the purpose need of the project which is to create and maintain current and future huckleberry habitat across the landscape to benefit cultural and recreational uses. There is also a need to maintain opportunities for access to huckleberry fields in this location of the Forest.

While AFRC supports the project we offer the following comments that we believe could make the project better.

1. First, AFRC encourages the Forest to treat as many acres in this 7,305 project area as possible to not only enhance the huckleberry fields, but also provide as much raw material as possible to existing sawmills and improve forest health and reduce wildfire risk. There is a big opportunity to intensively manage the forest within this area because of the land allocations with much of the area being designated as matrix. (See chart below).

Table 2. Northwest Forest Plan land use allocations and Region 6 Inventoried Roadless acres in the Waucoma planning area.

Land Use Allocation (LUA)	Approximate Acres in Planning Area (Percent)	Approximate Proposed Action Treatment Acres (Percent of LUA)
Riparian Reserves	1,299 (18%)	567 (44%)
Matrix	4,104 (56%)	2,660 (65%)
Late Successional Reserve (LSR)	114 (1%)	38 (33%)
Administratively Withdrawn	514 (7%)	0 (0%)
R6 Inventoried Roadless	1,288 (18%)	0 (0%)

While the Forest is planning to treat 2,660 acres in the matrix landscape, AFRC believes there are further opportunities to treat the remaining 1,444 acres.

AFRC believes that harvesting timber to create jobs and maintain existing infrastructure should be part of the purpose and need for this project. AFRC has several members that depend on timber from the Mt. Hood National Forest for their resource needs. The timber products provided by the Forest Service are crucial to the health of our membership. Without the raw material sold by the Forest Service these mills would be unable to produce the amount of wood products that the citizens of this country demand. Without this material, our members would also be unable to run their mills at capacities that keep their employees working, which is crucial to the health of the communities that they operate in. These benefits can only be realized if the Forest Service sells their timber products through sales that are economically viable. This viability is tied to both the volume and type of timber products sold and the manner in which these products are permitted to be delivered from the forest to the mills. There are many ways to design a timber sale that allows a purchaser the ability to deliver logs to their mill in an efficient manner while also adhering to the necessary practices that are designed to protect the environmental resources present on Forest Service forestland. AFRC members take a variety of log types and sizes. The Waucoma Huckleberry Enhancement Project has a diverse group of age classes and timber types that should be managed to provide the variety of wood needed by AFRC member sawmills.

2. AFRC also encourages the Forest to request a Forest Plan project-level amendment for Forestwide standards (FW) FW-323 and FW-324 to help achieve the purpose and need for the project in different locations within the treatment areas. A Forest Plan project-level amendment would facilitate the proposed action by authorizing the creation of openings of approximately 5 acres in uneven age management stands. Additionally, an exception to FW-306 and FW-307

may be necessary for some stands that have not reached 95% of culmination. For FW-306 and FW-307 exceptions may be made where resource management objectives or special resource considerations require earlier harvest. Treatments proposed within Forest Plan land use allocations B3 and B12 would encourage the removal of some dead and dying trees. AFRC also suggests that the Forest look at making openings larger than 5 acres for both huckleberry enhancement and wildlife forage. Most likely following these operations, the Forest will not revisit the area for management for 20-30 years. Tree encroachment and crown closure is rapid and could once again begin to choke out the huckleberry plantations if larger openings aren't made at this time.

3. AFRC supports the Forest in managing within the Riparian Reserves. While the Forest is planning on treating 44% of these areas, AFRC believes there are more opportunities for treatments. Recent large wildfires have shown that some of the most severe burns and resource damage have occurred in the riparian areas where the fuel loads are the highest. Creating openings in riparian areas also allows more sunlight to enter which can enhance huckleberry growth and other vegetation and insect production for a variety of species that depend on them for food.

The Northwest Forest Plan allows for work in Riparian Reserves to control stocking and acquire vegetation characteristics needed to obtain Aquatic Conservation Strategy objectives. Such work would be appropriate for this project. It has been documented by many that most of the wood that naturally recruits to streams comes from within the first 65 feet of the stream channel (Murphy and Koski, 1989; McDade et al. 1990. Johnson et al. 2011). If this is where the LWD is coming from then thinning in this region would likely accelerate its creation. We encourage the Forest to design riparian thinning treatments on this project in ways that foster positive changes to large wood supplies that would result in measurable changes. One way to accomplish this is to reduce the no-cut buffers. It has also been documented that vegetated buffers that are greater than 33 feet in width have been shown to be effective at trapping and storing sediment (Rashin et al. 2006). Partial cutting down to one or two conifers from intermittent and perennial stream channels would accelerate the recruitment of LWD with minimal impacts to sedimentation and stream temperature. We would like the Forest Service to consider these trade-offs closely in the planning for this project to improve riparian conditions on the maximum amount of these reserves.

We would also like the Forest to consider including some of the following pieces of scientific research into their analysis. Controversy surrounding any type of thinning in Riparian Reserves has surfaced, and we think the following information would be useful in justifying the kinds of beneficial treatments the Forest implements.

Stream temperature

Janisch, Jack E, Wondzell, Steven M., Ehinger, William J. 2012. Headwater stream temperature: Interpreting response after logging, with and without riparian buffers, Washington, USA. *Forest Ecology and Management*, 270, 302-313.

Key points of the Janisch paper include:

- The amount of canopy cover retained in the riparian buffer was not a strong explanatory variable to stream temperature.
- Very small headwater streams may be fundamentally different than many larger streams because factors other than shade from the overstory tree canopy can have sufficient influence on stream temperature.

Riparian reserve gaps

Warren, Dana R., Keeton, William S., Bechtold, Heather A., Rosi-Marshall, Emma J. 2013. Comparing streambed light availability and canopy cover in streams with old-growth versus early-mature riparian forests in western Oregon. *Aquatic Sciences* 75:547-558.

Key points of the Warren paper include:

- Canopy gaps were particularly important in creating variable light within and between reaches.
- Reaches with complex old growth riparian forests had frequent canopy gaps which led to greater stream light availability compared to adjacent reaches with simpler second-growth riparian forests.

(1) Small Functional Wood

Nearly all wood that falls into stream channels has the capacity to influence habitat and aquatic communities (Dolloff and Warren, 2003). Therefore, smaller woody material that enters stream channels is important to overall channel function because it can store sediment and organic material, contribute nutrients, and provide temporary pool habitat and slow-water refugia. It is important to note, however, that pools formed by smaller wood generally are not as deep or complex as those formed by large wood. In addition, small wood does not persist for long periods of time because it deteriorates quickly and is more likely to be flushed from the system (Naiman *et al.*, 2002, Keim *et al.*, 2002).

(2) In smaller streams adjacent to previously harvested stands, field surveys (McEnroe, 2010) indicated that relatively large amounts of existing (in-stream) and potential (standing) small functional wood are present. Field surveys also indicate that the vast majority of the down wood in these areas originated from within 50 feet of the stream channel. This is consistent with findings by Minor (1997), who found that in second-growth coniferous riparian forests, 70-84 percent of the total in-stream wood was recruited from within 15 meters (49 feet) of the channel. In addition, McDade *et al.* (1990) and Welty *et al.* (2002) found that 80 percent and 90 percent, respectively, of the wood loading occurred within 20 meters (66 feet) of the stream channel in coniferous forests.

4. AFRC suggests looking more at the use of DxP for any partial harvest areas. We believe that better results can be achieved in a much more efficient and cost effective manner by utilization of basal area thinning as described in a silvicultural prescription. AFRC also suggests selling timber sales on a tonnage recovery basis rather than lump sum would not only reduce risk for purchasers, it would increase efficiency and reduce cost for the Forest. Lump sum sales take a lot of time to cruise, DXD marking takes a lot of time and uses a lot of paint and we believe the same results could be attained using DXP and selling the sales by the ton. Many Forests are already using this option.

5. The east and south boundaries of the project abut private lands, and AFRC encourages the Forest to do as much forest stand improvement as possible along these boundaries to improve forest health and reduce the risk of wildfire. The current project map shows large areas of land next to adjacent property that isn't being treated. We believe this is an excellent opportunity to get these Wildland Urban Interface lands treated and we encourage the Forest to look at doing more treatments in these areas.
6. While there is no discussion of spotted owls being found in the area or owl circles being designated on the project map, AFRC would like to point out that over the past several years many Forest Service projects have been scaled back in scoping to a reduced level of acres treated due to perceived effects to the northern spotted owl. We encourage the Mt. Hood to consider a published study conducted by NCASI when assessing treatment areas and their potential affects to owls.

Larry L. Irwin, Dennis F. Rock, Suzanne C. Rock, Craig Loehle, Paul Van Deusen. 2015.
Forest ecosystem restoration: Initial response of spotted owls to partial harvesting

Among other findings, this study concluded that partial-harvest forestry, primarily commercial thinning, has the potential to improve foraging habitats for spotted owls. The treatments being proposed will likely affect northern spotted owl (NSO) habitat to some degree. Often this level of effect is quantified by the amount of forest canopy that remains following thinning treatments. AFRC has general concerns with how the Forest has been measuring these effects to NSO habitat, specifically regarding canopy cover/closure. Please see the attached document titled 'NSO Canopy Condition' as an addendum to these comments for consideration in how the treatments on this project are designed and how this design affects the NSO.

7. AFRC suggests the Forest consider current field conditions rather than strict contract dates regarding seasonal restrictions to allow greater flexibility in the operating seasons. Opportunity for winter operations and hauling would greatly benefit the local markets as well as provide better return to the government without sacrificing the end result.

Thank you for the opportunity to provide pre-scoping comments on the Waucoma Huckleberry Enhancement project. We look forward to following the implementation of this project as it moves forward.

Sincerely,



Tom Partin
AFRC Consultant
P.O. Box 1934
Lake Oswego, Oregon 97035

