



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

October 17, 2018

Kameron C. Sam, District Ranger
Barlow Ranger District
Mt. Hood National Forest
780 NE Court Street
Dufur, Oregon 97021

Dear Kameron:

On behalf of the American Forest Resource Council (AFRC) and its members, thank you for the opportunity to comment on the Rocky Restoration Project Draft EA.

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 Rocky Restoration project is located on the Barlow Ranger District within the Mt. Hood National Forest (the Forest). The project area is located in Wasco County approximately 28 miles southwest of The Dalles, Oregon. The Rocky Restoration project area encompasses approximately 14,300 acres in the Badger-Tygh and Rock-Threemile watersheds within the White River subbasin.

The current situation on the ground shows that past management activities have created highly dense, homogenous stand conditions throughout much of the project area. The high density of the stands contributes to mortality of trees because of competition for nutrients, water and sunlight. Densely stocked non-fire resistant trees, diseased trees, large-scale tree mortality areas, and down fuel are creating continuous fuel ladders from the ground to the tree crowns. This has increased the risk of uncharacteristic, large-scale insect and disease-related mortality as well as the risk of high-intensity wildfires.

Because of the above mentioned conditions found on the ground, the Forest has developed the following Purpose and Need for the project which AFRC supports:

- Restore stand health to improve resiliency to insects and disease
- Enhance forest diversity within plantations
- Enhance and restore pine/oak habitat and riparian reserves
- Provide opportunities to safely engage an active fire near private land
- Provide forest products consistent with the Northwest Forest Plan goal of maintaining the stability of local and regional economies.

While AFRC supports the Purpose and Need for this project, we do have some concerns regarding the Rocky Restoration Project and implementation. Those concerns include:

1. First, AFRC is disappointed that the Forest opted to not treat any stands over 80 years of age especially since 7,196 acres of the total 14,278 project acres (or 50%) are designated as matrix. The Forest opted to only treat stands younger than 80 years so as not to have to do the two years of surveys required to treat older stands. Again, this is a big opportunity lost because the initial scoping for the project came out in October, 2015 and the Forest would have had ample time to complete the surveys. AFRC is generally opposed to the Forest Service using a single stand attribute such as age to determine the suitability of a stand's need for treatment. We believe this practice over-simplifies the forest that you are tasked with managing. Stand conditions, independent of random attributes such as age, should be the primary element that drives silvicultural prescriptions. We strongly urge the Forest Service to avoid using stand age as a surrogate for stand conditions when assessing the need for treatment on any forest stand.

Treating the matrix lands within the project area would have made the project more economically feasible and would have allowed for a larger product mix and most likely higher stumpage values for the timber being sold. This is also very important to AFRC's membership because 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.

2. AFRC is very concerned that this project is not economically feasible. A description of the stands to be treated includes: "The majority of the proposed treatment areas are in the stand initiation, stem exclusion, and stand re-initiation stages dominated by small to medium size material with a quadratic mean diameter (QMD) ranging from 3 to 12 inches and an average height of 60 feet. Plantations range in age from 25-71 years old and are dominated by stands in the initiation stage in dry mix conifer plant communities and the stem exclusion and stand re-initiation stage in the moist mix conifer."

Most of the stands to be treated are the result of plantations from previous logging or from the Rocky Fire that burned in 1973. These stands are overcrowded, with small diameter classes and for the most part a very low quality and low value sawlogs. AFRC did note that some additional higher value stands were added to the project on the western side the project area, however, we do not believe this small volume will be enough to make the sale economically feasible in today's markets.

3. AFRC proposes two options for implementation of the units with marginal economic viability in this proposed project and the work the Forest is contemplating doing to reduce the risk of wildfire in the Wasco Community Wildfire Protection Plan and the Pine Hollow Wildland Urban Interface. First, for units determined to be uneconomical, this project could be implemented through an IRSC whereby the Forest puts additional money into the project to pay for needed fuels reduction and small diameter product removal. Second, the Forest could implement those units determined to be economically feasible, using a timber sale contract. The completion of non-commercial fuels reduction work could be assessed following the implementation of this contract.

AFRC would then recommend going back into this project area and analyzing the matrix lands that are available for harvest, doing the two-year survey protocols and putting together a timber sale project that would generate the needed revenues to do the fuels reduction work necessary. Unfortunately, the way this project is set up right now, there will be very little value in the sawlogs, and few if any stumpage revenues generated to do the needed fuels reduction.

4. AFRC supports the Forest in managing within the Riparian Reserves. These areas represent 9% of the project area and some of the best growing sites. Further, 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 the riparian areas also allows more sunlight to enter which can enhance 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 (Doloff 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.

5. AFRC requests the Forest thin stands to the widest residual tree spacings and leaving only 40 sq. ft. of basal area. This wider thinning is needed for fuels reduction, for enhanced tree growth and for better timber sale economics.
6. AFRC suggests the use of Designation by Prescription (DxP) as the means to designate trees for harvest for any appropriate 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, which 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.
7. There are 3 historic home ranges for spotted owls that overlap treatment units in the project area. 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.

8. AFRC suggests the Forest consider more conditions based rather than strict 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.

We have concerns with several project design criteria in particular. First, page 19 of the EA states that “no ground based mechanized equipment would be allowed within 100 feet of streams, seeps, springs or wetlands. This would reduce the chance of sediment delivery to surface water.” The very next PDF directs that “no skidding in riparian reserves between October 31 and June 1.” We are confused how the Forest Service is reconciling these two PDFs. How could ground based equipment create a “chance of sediment delivery to surface water” if there are already restrictions that prohibit the use of ground-based equipment in the wet season? We would like the Forest Service to either describe how sediment delivery to surface water is a reasonable possibility with the existing timing restrictions in place or consider removing the 100-foot operating restriction.

Thank you for the opportunity to provide comments on the Rocky Restoration Project Draft EA. I look forward to following the implementation of this project as it moves forward.

Sincerely,

A handwritten signature in cursive script that reads "Tom Partin". The signature is written in black ink and is positioned below the word "Sincerely,".

Tom Partin
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