



April 17, 2019

Via Email To: [comments-pacificnorthwest-giffordpinchot-cowlitzvalley@fs.fed.us](mailto:comments-pacificnorthwest-giffordpinchot-cowlitzvalley@fs.fed.us)

Gar Abbas  
District Ranger  
Cowlitz Valley Ranger District  
Gifford Pinchot National Forest  
10024 US Hwy 12  
Randle, WA 98377

**In Reply to:** Kraus Ridge

Dear Mr. Abbas:

The American Forest Resource Council (AFRC) submits the following comments for scoping for the proposed Kraus Ridge Project

AFRC represents the forest products industry throughout Oregon, Washington, Idaho, Montana, and California. AFRC's members include 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 protection of all forest lands. Many of our members have their operations in communities adjacent to the Gifford Pinchot National Forest (GPNF), and the management on these lands ultimately dictates not only the viability of their businesses, but also the economic health of the communities themselves. The forest products sector in Washington State continues to provide around 40,000 direct and about 100,000 indirect jobs. Many of these are found in rural communities like those in East Lewis County and the surrounding areas. In addition to the wages paid, the taxes and other monetary transactions generated by these businesses and family-wage jobs, contribute to the infrastructure and well-being of the local communities. AFRC submits these comments on behalf of its members.

Lack of supply of raw materials to fill manufacturing demands for wood products continues to be an issue in Washington. Several mills have closed in the past few years. Vegetation management projects, both current and future, on the GPNF can help contribute to the wood supply in Washington that many mills depend on to continue operation and employment of their work force. The economic activity created through these treatments contribute to the greater community well-being.

## **Proposed Action**

AFRC is generally in support of the prescriptions in *Action 1 – Commercial Timber Harvest*. For Prescription 1 as applied to Matrix lands, we would like for the Forest to assure those stands have not reached culmination of mean annual increment which would make them eligible for regeneration harvest. Assuming they have not culminated then the proposed prescriptions appear consistent with Matrix goals. We are encouraged by the Forest's proposal to commercially treat portions of the Riparian Reserves. We have seen other Forests in Region 6 propose similar project with narrow (30 feet minimum on non-fish bearing streams and 50 feet minimum on fish bearing) variable width inner no cut buffers, while commercially treating the outer portions of the riparian reserves. As we mention below this has both economic and ecological benefits in support of this proposal.

AFRC supports Prescription 2, as it is consistent with the GPNF Plan, Northwest Forest Plan (NWFP) and supports the Purpose and Need of this proposal.

We generally support Prescription 3 as it supports both the development of timber volume for local mills and other forest workers while also enhancing other economic contributors to the local economy through both commercial and recreational berry picking.

*Action 2 – Huckleberry Enhancement*. We would like to understand the complete land allocation of the acres in the Action 2 proposal. While it appears 50 acres are located on AWA lands as identified in Action 1-Prescription 3, it is unclear the status of the other 32 acres. AFRC would be concerned if actions in the proposal on those 32 acres were inconsistent with other land management goals for forest stand development.

AFRC supports *Action 3*. Opportunities to improve roads and stream crossings to maintain and improve access is key to both vegetation management and recreational opportunities now and into the future. Timber/vegetation management projects can and will support the maintenance and enhancement of the transportation system for a wide range of users. We appreciate seeing the Forest continue to propose road daylighting projects. An additional benefit from daylighting is the potential to develop hardwood timber volume. Hardwoods are in high demand and would potentially help support two mills located in Lewis County.

*Action 4* raises some concerns for us. We understand the Forests desire and needs for snag and down wood creation in some LSR stands. We would urge the Forest to assure these stands have had any needed thinning operations completed prior to snag creation. Returning to thin stands with created snags potentially can create safety hazard issues that may create future management issues.

We also are concerned with the Western Red Cedar Enhancement proposal. Our concern lies in the proposed slashing and non-removal of the alder. As mentioned earlier, Alder is in high demand and supply is constricting the operation of local hardwood mills. We would encourage the Forest to evaluate the potential to make the Alder removal a commercial operation prior to planting the cedar. It is potentially possible to turn the cedar enhancement project into at least a revenue neutral if not positive proposal.

*Action 5 - Special Habitat Restoration*. We generally are not concerned with portions of this proposed action. However, we do wish to assure that commercial products created in this proposal are provided

to the market place. Additionally, more clarity on the landing restoration and how dispersing old slash piles may or may not impact birds and other animals using those slash piles. We support the proposed AOP work in this action item.

*Action 6 – Access Restoration* has some concerns for us. Especially since the proposed Road Network Adjustments actually appear to be removing current and potential access, not restoring access. The Forest mentions in the opening parts of the document “the funding available to the GPNF for road work is insufficient to maintain the system in a like-new condition” (GPNF Travel Analysis Report, “TAR”, p. 11). We would like to understand what the definition of “like new” is and why there would be an expectation of maintaining roads in a “like new” condition? The expectation for any forest road system, (private, state, or federal) should be to provide a safe means of travel that does not negatively impact water resources and other aspects of the environment. This goal does not require a “like new” condition. In fact there are thousands of miles of forest roads in Washington State that meet water quality standards and other environmental regulations without being in a “like new” condition.

It is also unclear why ML 1 roads which in theory are in a “Closed and Stabilized” status that do not pose risk to aquatic resources are now proposed for removal. It is also unclear why roads that are in ML 1 and not passable to passenger vehicles pose a risk to wildlife. Based on the information contained in the scoping notice we do not believe the Forest has made the case for decommissioning most of the roads proposed for removal. Further information on the concept behind “like new” and why moving from ML 1 to complete removal is necessary particularly where aquatic risk is not noted would be helpful as this proposal proceeds.

For all Actions or their subcomponents not mentioned in this comment letter, we are further evaluating our positions on them, including gathering additional data. At this time it is not possible to identify for each of those Actions/sub-actions if we are in support, neutral, or not in favor of them. We look forward to the Draft EA as one source of that information.

Some additional details for consideration:

- **Prescriptions:**
  - Removal of low volumes per acre in thinning operations can lead to harvest costs outweighing the value of the timber removed, particularly as the logging systems costs increase (ground vs. cable vs. helicopter).
  - Wider spacing of the residual stems in thinning can aid in both operational efficiency and also the safety of crews working on the ground, cable and helicopter logging systems.
    - Downhill cable yarding increases costs and risk of residual stem damage. Increasing spacing of residual trees by removing greater volume in these stands can enhance economic viability of the project.
  - Consider opportunities to include hardwood removals where appropriate, including road daylighting. This can help support Item 3 of the proposed action by helping to maintain the infrastructure of hardwood processors.
    - Expanded treatment prescriptions in AMA could evaluate hardwood removals in development of forest structure.
  
- **Riparian Reserves**

- AFRC would encourage the ONF to undertake evaluation and propose treatments within the Riparian Reserves (RRs) with minimal “no-cut buffers”. Past harvest practices often included harvesting of the riparian zones. In many cases across the landscape this has led to dense structurally simple stands located in both the uplands and riparian areas. Today’s modern harvesting practices, BMPs and equipment provide the opportunity to manage with riparian areas to benefit desired future conditions while preventing water quality impacts and other impacts from the harvest activity. Commercial treatments in these zones not only enhances the economic performance of this proposal but also accelerates structurally simple stands in developing more complex structure and the ability to grow larger trees for future large woody debris recruitment in the associated streams.
- We would also offer the following information for use as support of these treatments or in future projects:
  - Anderson, P.D., Larson, D.J., Chan, S.S. 2007. Riparian Buffer and Density Management Influences on Microclimate of Young Headwater Forests of Western Oregon. *Forest Science*. 53(2) 254-269
  - Benda, L.E., Litschert, S.E., Reeves, G. et al. 2016. Thinning and in-stream wood recruitment in riparian second growth forests in coastal Oregon and the use of buffers and tree tipping as mitigation. *J. For. Res.* 27: 821.
  - Groom, J.D., Madsen, L.J., Jones, J.E., et al. 2018. Informing changes to riparian forestry rules with a Bayesian hierarchical model. *Forest Ecology and Management*. 419-420(2018) 17-30
  - Olson, D.H., Burton, J.I. 2014. Near-Term effects of repeated-thinning with riparian buffers on headwater stream vertebrates and habitats in Oregon, USA. *Forests* 2014. 5, 2703-2729
  - Spies, T.; Pollock, M; Reeves, G.; et al. 2013. Effects of riparian thinning on wood recruitment a scientific synthesis. Science Review Team Wood Recruitment Subgroup. Portland, OR: U.S. Department of Agriculture, Forest Service, Pacific Northwest Region. 46p. On file with: Pacific Northwest Research Station, 3200 SW Jefferson Way, Corvallis, OR 97331
  - Sweeney, B.W., Newbold, J.D. 2014. Streamside forest buffer width needed to protect stream water quality, habitat, and organisms: a literature review. *Journal of the American Water Resources Association*. 2014. 50 (3), 560-584
- **Harvest Systems:**
  - Selection of the appropriate harvest systems for the economic need of specific units.
  - Maximizing opportunities for mechanical harvesting and yarding can enhance economic viability.
    - This includes consideration for expanding ground-based operations beyond the slope limitations typically set for these logging systems.

- The use of tethered logging systems for both cutting and yarding should be evaluated in the Environmental Analysis.
  - Seasonal timing restrictions, particularly in the case of helicopter operations, can create economic challenges to a successful project. Expanding operating windows to the maximum as practically allowed, including options for winter operations, should be evaluated. Other Forests within Region 6, including West Side Forests, are implementing and evaluating opportunities to expand operating windows. These include more outcome-based constraints as compared to prescriptive.
  - Selection of prescriptions and residual stem spacing appropriate for the type of harvesting.
    - Downhill yarding in a thinning will be less expensive and should have less residual stem damage with a wider spacing.
  - Fixed “move in costs” spread over a smaller volume could mean the difference between success and failure of a project from an economic viewpoint.
  - Prescriptions and sale timing and “packaging” needs to have careful consideration for units proposed for helicopter logging to assure economic viability.
- **Roads:**
  - Roads are an important part of the infrastructure providing access to the forest for a variety of stakeholder uses including forest management and recreation needs.
  - Opportunities to invest in this infrastructure through the maintenance and improvement of systems roads should be evaluated and appears to be part of the Proposed Action. This maintenance can lead to reduction and elimination of potential sediment delivery sources. It also has the potential to allow the Forest to examine opportunities for expanded operating windows, including winter operations.
  - The use of new temporary roads and existing non-system roads will help to reduce logging costs. When BMPs are used, these roads can be relatively low standard roads and then decommissioned as planned.
  - AFRC is happy to see the Forest will include the analysis of rock pit expansion and development of Forest Service rock resources. This has the potential to reduce operational costs and improve economic viability of future sales and road maintenance.

AFRC supports the use of an EA rather than an EIS for this project. An EA is more than sufficient to analyze potential environmental impacts. The project is not precedential as it implements routine prescriptions applied to green timber stands. The treatments are well within the limits prescribed by the Northwest Forest Plan. This project does not have a significant impact on the environment.

Thank you for the opportunity to comment on this project. We look forward to participating in the further development of this proposal. Should you have any questions regarding the above comments or would like additional information, please contact me at 360-352-3910 or [mcomisky@amforest.org](mailto:mcomisky@amforest.org).

Sincerely,



Matt Comisky  
 Washington State Manager  
 American Forest Resource Council