



**VIA Email:** [comments-pacificnorthwest-colville-newport@fs.fed.us](mailto:comments-pacificnorthwest-colville-newport@fs.fed.us)

April 9, 2019

Gayne Sears, District Ranger  
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Dear Gayne:

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

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 Colville 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.

AFRC provided scoping comments on this project on May 11, 2018. The Boulder Park project is located in the Tacoma Creek and Cusick Creek watersheds which are located southwest of Ione, Washington. There are approximately 32,165 acres in the project area of which 26,247 are Forest Service lands. These are high priority watersheds currently classified as “functioning at risk.”

In our scoping letter, AFRC supported the purpose and need for the project which is improving forest resiliency, watershed function, and contributing to local economic health and stability and was developed to meet the desired future condition of forest plan management areas.

While AFRC supports the purpose and need, we offer the following suggestions that we believe could improve the overall project.

1. In our scoping comments AFRC supported the action for mechanically treating 10,000-12,000 acres within the 26,247 acres of Forest Service lands. Our comment was actually “AFRC supports treating the largest footprint of at least 12,000 acres to improve forest health, reduce wildfire risk, enhance water quality and quantity, and to improve the other resources listed above.”

Unfortunately, the proposed action now calls for only mechanically treating 9,010 acres in the proposed action. We encourage the Forest to maximize the commercial volume being removed from these 26,247 acres. For every one million board feet of timber harvested approximately 12 jobs are created. Several milling facilities have left communities surrounding the Colville National Forest in recent years due to the lack of adequate log supply including the sawmill in Republic. Also, the sawmill in Usk has been working at reduced shifts and this project could help that facility build to two shifts. It should be noted that projects like Boulder Park could help maintain the existing milling facilities that depend on wood from the Forest and will also help support the existing logging infrastructure.

AFRC has several members that depend on timber from the Colville National Forest for their resource needs. The timber products provided by the Forest Service are crucial to the health of our membership within this operating area. 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 Boulder Park 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. The plan calls for commercially thinning 4,480 acres focusing on removing the suppressed and less vigorous appearing trees with the smallest crowns (a “thin from below”) and increasing the growing space for the largest and most vigorous appearing trees. AFRC recommends thinning in those stands to a 40 sq. ft. basal area factor. This would allow for the remaining trees to be more open grown and vigorous as well as generating more commercial volume.
3. The Forest is also planning to use group selection on only 50 acres to remove all trees in groups up to five acres in size. The plan is to use this treatment where trees have a reduced growth rate or where lodgepole pine dominates. AFRC also suggests a broader use of this harvest method in order to create early seral habit for big game species such as deer and elk. The Forest has an abundance of cover, but is lacking forage, and this

system could help with creating more forage. AFRC encourages the Forest to treat more acres using the group selection method.

4. In our previous scoping comments, we suggested that the Forest thin to wider spacings for the vigor of residual trees and for risk reduction from wildfires. Further, the insect damage, blowdown volume and overcrowding problem in many of the stands need to be addressed, and this will require heavy thinnings or regeneration harvests to establish young disease free stands. To supplement that comment, attached is a report by R. Haugo et al. titled *Forest Ecology and Management*. The report states that approximately 41% of all coniferous forests in eastern Washington and eastern and southwestern Oregon is in need of a transition to a different s-class in order to restore forest structure to a Natural Range of Variability condition. This report points out the fact that the forests in eastern Washington need to be heavily thinned to reduce fire danger and return these stands back to more natural conditions.

Further to support the level of needed restoration, the report finds: *“We have identified approximately 1.7 million ha presently in need of disturbance (including disturbance then succession) to restore forest structure NRV on US Forest Service lands outside of wilderness and inventoried roadless areas. Within our analysis area the US Forest Service averaged approximately 12,000 ha per year of hazardous fuels treatments between 2004 and 2013 and had a total of nearly 19,000 ha of forest vegetation improvements in 2013 (US Forest Service Pacific Northwest Region; unpublished data). Assuming that these treatments are additive and address disturbance restoration needs identified in this study, at these treatment rates **it will take over 50 years to meet the identified disturbance restoration needs on these US Forest Service lands.**”*

5. As pointed out by the Purpose and Need, the Forest intends to improve watershed functions in the Boulder Park project. AFRC strongly encourages the Forest to enter into the riparian areas to remove some of the fuel loading and cover. 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.

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. Much 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.

The photo below represents the uncharacteristically severe wildfire impacts associated with riparian areas. The area pictured is from the nearby Colville Indian Reservation.



6. AFRC appreciates the Forest raising the percentage slopes that ground based skidding equipment can operate on to 40%. We encourage the Forest to stay flexible in this percentage to reflect the type of equipment being used. For example, if a contractor has tethered logging equipment, that equipment may be able to operate on slopes over 40% with little or less damage to residual resources such as soil and timber.
7. AFRC supports the use of Designation by Prescription (DxP) for this project. The Forest is currently using this tool on a broad scale and it is working well. It is both a time and money saver for the Forest allowing more time to be spend on planning new projects.

8. AFRC supports the road plan of reducing the amount of system roads in the project area by 14 miles. However, we are very concerned that a total of 38 miles of road will be decommissioned. This is a very expensive process calling for:

- recontouring the existing road bed to match the adjacent topography
- removing culverts or other stream channel crossing structures
- seeding or planting trees or both
- soil decompacting,
- placement of down woody material or rocks

AFRC asks the Forest to look at just closing more roads than the 12 miles currently planned. Closing roads is much cheaper because it uses gates or other means. For those roads which access NFS lands only, replace gates with earthen berms / boulders installed on the road entrance. By using this technique, it allows for a road to be used at a later time for land management, fire access or recreation.

There is a huge opportunity to use retained receipts or K-V funds from the harvest of timber on this project to improve many of the other resources that have been mentioned including the installation of new culverts or possible road relocation to prevent potential road failures or stream sedimentation. There will be a need for thousands of acres of precommercial thinnings, prescribed burnings, and other treatments as well that could be funded by these timber receipts. AFRC does not think these receipts should be heavily weighted to road decommissioning.

9. AFRC believes that analyzing this project using an Environmental Assessment (EA) is adequate since there appears to be no significant negative impacts on the landscape during proposed operations, rather the actions will improve forest health and benefit other resources as well as reducing the threat of catastrophic wildfire to the Forest and to adjacent land owners.

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

Sincerely,



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