



GIFFORD PINCHOT TASK FORCE

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December 19, 2014

Mosé Jones-Yellin
Mt. Adams District Ranger
2455 Highway 141
Trout Lake, WA 98650

Re: Bear Creek Restoration project scoping comments

Dear Mr. Jones-Yellin:

Thank you for the opportunity to comment on the proposed Bear Creek Restoration project. The Gifford Pinchot Task Force's ("Task Force") mission is to protect and sustain the Gifford Pinchot National Forest and neighboring communities through conservation, science, and advocacy. We represent 6,000 members and supporters who share our vision of conserving and restoring healthy aquatic and terrestrial ecosystems throughout the forest.

Overall, the Task Force is supportive of many components of this project, including efforts to restore Oregon white oak habitat, replace culverts and stormproof roads, and decommission and close unnecessary forest roads to protect water quality, fish, and wildlife. We would like to see more of these types of restoration projects in the forest to improve watershed health and increase declining oak habitat.

We are also supportive of thinning in true plantation stands of young, densely planted trees that are generally all of the same size, spacing, and species for the purpose of creating increased diversity and improved stand structure. According to the scoping notice, most of the Bear Creek project area includes dense stands of primarily Doug fir that are 40-50 years old, which fits that criteria. In using variable retention methods, we recommend that "gaps" are kept small and are situated away from: important habitat features (e.g. snags and clumps of large wood), streams at the appropriate full buffer widths, and wildlife corridors.

While we support many aspects of this proposal, the Task Force does have some concerns related to the commercial thinning portion of the project, as follows.

Riparian Reserves

The Aquatic Conservation Strategy (ACS) of the Northwest Forest Plan prohibits thinning in Riparian Reserves *unless* needed to attain ACS objectives. The Forest Plan allows agencies to

“apply silvicultural practices for Riparian Reserves to control stocking, reestablish and manage stands, and acquire desired vegetation characteristics needed to attain Aquatic Conservation Strategy objectives.” See NWFP, C-32.

It is incumbent upon the Forest Service to demonstrate the scientific need for thinning treatments in Riparian Reserves to benefit aquatic and riparian resources. Recent studies suggest that passive management in Riparian Reserves may be most appropriate method to protect aquatic systems.

For example, in a 2014 study, researchers found that “allowing riparian forests to naturally develop may result in the most rapid and sustained development of structural features important to most terrestrial and aquatic vertebrates.” See Pollock, Michael M. and Timothy J. Beechie, 2014. Does Riparian Forest Restoration Thinning Enhance Biodiversity? The Ecological Importance of Large Wood. *Journal of the American Water Resources Association (JAWRA)* 50(3): 543-559. In that study, researchers assessed Doug fir dominated riparian stands of 30-40 years old, very similar to the Bear Creek project area. According to the study:

[R]estoration thinning should generally be limited to situations where large deadwood is already abundant, or where the needs of the few species that need very large (> 100 cm diameter) live trees outweighs the needs of the many species that utilize large deadwood. In particular, for providing deadwood to streams, this suggests that for the purposes of facilitating the formation of complex wood jams to benefit the myriad species that utilize the diversity of habitat formed by such jams (e.g., salmonids), a passive management approach that allows for large deadwood production across a range of sizes may be most appropriate.

Pollock and Beechie 2014, p. 556.

Further, the study emphasizes uncertainty in the response of particular species to treatments that attempt to recreate associated habitat structures, as well as the possibility of neglecting other important features that a species needs. For example, “attempts to restore spotted owl habitat by heavily thinning to accelerate the development of large diameter nesting trees could actually delay spotted owl recovery by reducing production of the large down wood utilized by the species it preys upon.” *Id. citing* Forsman et al., 1984; Carey, 1995; North et al., 1999.

In addition, a recent interagency study assessed the potential ecological outcomes of riparian thinning in relation to ACS objectives, noting that riparian thinning “can reduce the future supplies of snags and large dead down and decomposing wood on the forest floor and in aquatic systems,” potentially retarding attainment of ACS objectives #8 and #9. See Spies et al 2013, p. 27.

Thinning in Riparian Reserves can also “increase stream temperatures beyond a level that supports healthy aquatic and riparian ecosystems,” potentially retarding attainment of ACS Objective #4 (*Id.* at 26) and contributing to water quality standard violations.

Bear Creek and Cedar Creek are currently listed as Category 4a impaired water bodies due to high temperature. Both rivers were removed from the Clean Water Act Section 303(d) list once the Wind River Total Maximum Daily Load (TMDL) was created in 2002, but have not yet met standards developed under the TMDL. See Wind River Watershed Temperature Total Maximum Daily Load, March 2002. According to the TMDL, logging is one of the factors that decreases shade and increases solar radiation, which contributes to increased water temperature. Accordingly, the TMDL recommended the following management activities to comply with water quality standards for water temperature:

- For U.S. Forest Service land, the riparian reserves in the Northwest Forest Plan are recommended for establishment of mature riparian vegetation;
- Decommissioning of forest roads is recommended according to the Water Quality Restoration Plan (Tracy et al, 2001) to reduce runoff and sediment loading from roads and improve channel conditions.

See Wind River TMDL, p. 43.

Additionally, the Bear Creek project area is in the Wind River Watershed, a Tier 1 Key Watershed that contributes directly to federally listed salmonids. Both winter and summer steelhead, which are federal threatened under the Endangered Species Act, are either present or presumed to be present in Bear Creek and Cedar Creek. See Wind River Subbasin Plan 2010. As such, thinning in Riparian Reserves could have a detrimental impact on listed salmonids if it results in increased temperature, sedimentation, dissolved oxygen or other water quality issues.

For all of the above reasons, the Task Force recommends that the Forest Service refrain from thinning in Riparian Reserves within the Bear Creek project area. We also recommend that the Forest Service adhere to the Riparian Reserve buffer requirements in the Aquatic Conservation Strategy of at least two site-potential tree heights on either side of fish-bearing streams, and at least one tree height on non-fish bearing streams.

Northern Spotted Owl habitat

The Northern Spotted Owl was listed as a threatened species in 1990 due to widespread loss of its old-growth forest habitat. 55 Fed. Reg. 26,114 (June 26, 1990). The U.S. Fish and Wildlife Service designated revised critical habitat for the Northern Spotted Owl (*Strix occidentalis caurina*) under the Endangered Species Act, effective on January 2, 2013. In total, approximately 9,577,969 acres (ac) (3,876,064 hectares (ha)) of critical habitat were designated in California, Oregon, and Washington, including the entire Bear Creek project area.

The Task Force is concerned about the possible proximity of some of the plantation units to active spotted owl sites and the impacts of thinning within critical habitat. Right now, with the

negative impact that barred owls are having on spotted owls, the Forest Service should be cautious that timber harvest activities do not add to the pressure on spotted owls, or directly harm or adversely modify their habitat.

Roads

We are pleased to see that roads are proposed for decommissioning, or closure and stabilization, in this project and support the Forest Service's efforts to implement road restoration in this highly sensitive watershed.

Wildlands CPR reviewed road density thresholds for wildlife and found that closure and removal of roads has been found to effectively provide wildlife security and increase the amount of available wildlife habitat. They recommend that "wildland managers should strive to keep roaded lands below 0.6 km/km² (1.0 mi/mi²) to ensure healthy wildlife populations (Wildlands CPR). In addition, the road density desired condition only takes into consideration the open road density, which unfortunately doesn't include temporary roads, user created roads, and yarding and logging impacts. Temporary roads can detrimentally affect stream health, as well as habitat for Northern Spotted Owl and a variety of regional species. They can also result in the compaction of soil, alteration of the forest microclimate, alteration of the flow of water in the stand, erosion, sedimentation, and increased peak flows of nearby streams.

We are supportive of the Forest Service's efforts to include road restoration in this project and encourage the agency to increase the number of miles designated for closure and stabilization or decommissioning in areas that are sensitive habitats or where roads have significant impacts on water quality. In addition, the Task Force requests that the EA include an analysis of temporary roads and road reconstruction and the economic and ecological tradeoffs of individual road segments.

Early Seral

The scoping notice states that one of the purposes of this project is "to protect and enhance conditions of late-successional and old-growth forest ecosystems, which serve as habitat for late-successional and old-growth related species, including the northern spotted owl" in accordance with Late Successional Reserve (LSR) objectives. However, the notice says that a secondary purpose of the project is to create forage for deer and elk through creation of early seral habitat.

While the Task Force is supportive of using variable density thinning with small gaps to create diversity in this project area (with the aforementioned caveats), it is unclear how creation of early seral habitat meets LSR objectives under the Northwest Forest Plan. We are also not aware of any landscape scale assessments demonstrating the need for early seral habitat in the project area. If they are to be considered, we strongly urge that there be consideration taken to mimic true natural disturbance occurrences that leave natural legacy features such as snags and downed wood and have a more modest prescription than traditional clearcuts. We also

encourage that there be an adequate monitoring plan developed to provide the Forest Service and the collaboratives with information on the effectiveness and need for early seral in this environment. A monitoring plan could include monitoring the area for vegetation recruitment, understory regrowth, invasive plant recruitment into the area, use of the area by herbivores, and effects on surrounding forests (edge effects).

Conclusion

The Task Force greatly appreciates your consideration of our comments. We look forward to continuing to work with you on this project.

Sincerely,

/s/ Laurele Fulkerson

Laurele Fulkerson
Policy Director