GIFFORD PINCHOT TASK FORCE

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December 23, 2015

Gar Abbas
Cowlitz Valley District Ranger
10024 U.S. Highway 12
Randle, WA 98377

RE: Silver Creek Thin EA comments

Dear Mr. Abbas:

Thank you for the opportunity to comment on the proposed Silver Creek Thin project. The Gifford Pinchot Task Force's ("Task Force") mission is to protect and sustain the forests, streams, wildlife, and communities in the heart of the Cascades through conservation, education, 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.

The Task Force is 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 draft Environmental Assessment (EA), much of the project area includes plantation stands that are roughly 40-70 years old. However, we are very concerned about the proposal to conduct regeneration harvest to create early seral habitat on 176 acres of matrix lands, especially for units that contain older, naturally regenerated stands, suitable northern spotted owl (NSO) habitat, marbled murrelet habitat, and soil stability issues. In addition, while we commend the Forest Service for including road closures/stabilization where high terrestrial and aquatic risks are present and excluding inner Riparian Reserves from commercial harvest, we are concerned about pre-commercial thinning in inner Riparian Reserves and temporary roads and landings in outer Riparian Reserves.

We request that the Forest Service consider an alternative in its environmental analysis that:

- Drops units 28E, 29E, 37E, and 38E from a harvest prescription;
- Substitutes thinning for the remaining regeneration harvest units on matrix lands;
- Increases no-cut buffers in inner Riparian Reserves to at least 100-130 feet, as described in the Riparian Reserve section below;
- Eliminates stream crossings and relocates landings outside of Riparian Reserves;
- Reduces the amount of temporary roads and road reconstruction; and
- Eliminates timber harvest within suitable Northern Spotted Owl (NSO) nesting, roosting, and foraging habitat and marbled murrelet nest sites (Unit 29).

The Task Force's concerns related to this project and suggested alternatives are explained in further detail below.

National Environmental Policy Act (NEPA)

We are concerned with the lack of action alternatives in the Silver Creek Thin draft EA. The Task Force wrote scoping comments that raised several issues that were not analyzed. NEPA requires a federal agency to "study, develop, and describe appropriate alternatives" to a proposed project independent of whether the agency is preparing an EA or an EIS. 42 U.S.C. § 4332(2) (E); Bob Marshall Alliance v. Hodel, 852 F.2d 1223,1229 (9th Cir. 1988); see 40 C.F.R. § 1508.9. The Ninth Circuit made clear in Western Watersheds v. Abbey, "The existence of a viable but unexamined alternative renders an EA inadequate." 719 F.3d at 1050.

In the Silver Creek Thin EA, the Forest Service only considered the no action alternative and the proposed action. There are viable alternatives that would have less impacts on aquatic and riparian ecosystems and NSO and marbled murrelet populations, such as providing for increased no-cut buffers in Riparian Reserves, minimizing or eliminating stream crossings and road construction, and decreasing or eliminating regeneration harvest on matrix lands. We have suggested and continue to suggest viable alternatives herein, which we hope that the Forest Service will adopt.

Under NEPA, an agency must prepare an EIS if a proposed federal action could "significantly affect the quality of the human environment." 42 U.S.C. § 4332 (2)(c). The significant effect need not actually occur; it is sufficient to trigger the preparation of an EIS if a substantial question is raised "whether a project may have a significant effect on the environment." Blue Mountains Biodiversity Project v. Blackwood, 161 F.3d 1208, 1212 (9th Cir. 1998). Council on Environmental Quality Regulations define significant effect by reference to both the context and intensity of the action. There are a number of factors that the agency must consider in assessing the intensity of the action, including:

> (1) Impacts that may be both beneficial and adverse. A significant effect may exist even if the Federal agency believes that on balance the effect will be beneficial.
> (2) The degree to which the proposed action affects public health or safety.
> (3) Unique characteristics, such as proximity to historic or cultural resources, park lands, prime farmlands, wetlands, wild and scenic rivers, or ecologically critical areas.
> (4) The degree to which the effects are likely to be highly controversial.
> (5) The degree to which the possible effects are highly uncertain or involve unique or unknown risks.
> (6) The degree to which the action may establish a precedent for future actions with significant effects or represents a decision in principle about a future consideration.
> (7) Whether the action is related to other actions with individually insignificant but cumulatively significant impacts. Significance exists if it is reasonable to anticipate a cumulatively significant impact on the environment. Significance cannot be avoided by terming an action temporary or by breaking it into small component parts.

> (8) The degree to which the action may adversely affect [sites/structures] listed in or eligible for listing in the National Register of Historic Places or may cause loss or destruction of significant scientific, cultural, or historical resources.
> (9) The degree to which the action may adversely affect an endangered or threatened species or its habitat that has been determined to be critical under the Endangered Species Act of 1973.
> (10) Whether the action threatens a violation of Federal, State, or local law or requirements imposed for the protection of the environment.
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> 40 C.F.R. § 1508.27(b).

We believe that an EIS is required here for numerous reasons, including: multiple components of this proposal are highly controversial (e.g. regeneration harvest of 176 acres); the possible effects are highly uncertain or involve unique or unknown risks (e.g. Riparian Reserve thinning and regeneration harvest); cumulative impacts due to multiple projects in the same geographic area and watersheds that could adversely affect NSO critical habitat, marbled murrelets, and Riparian Reserves; and the project is likely to adversely affect NSO critical habitat and marbled murrelets.

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. We understand that there are a range of scientific opinions on riparian thinning projects, but there is enough science questioning the practice that we request the precautionary principle be practiced when deciding when, where, and how intense to prescribe a thinning prescription in Riparian Reserves. 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. 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.
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> Pollock and Beechie 2014 at 556.

Down Wood, Snags, and Other Key Habitat Features

Many Riparian Reserves are short of dead wood due to past and ongoing logging, roads, and fire suppression. In the Silver Creek project area, there are multiple streams with poor large woody debris and poor pool per mile ratings. Natural processes of stand growth and mortality will correct this shortage, whereas thinning could capture and export mortality and reduce and delay recruitment of wood to both streams and uplands within Riparian Reserves. This is not a minor short-term effect, but rather a significant long-term effect. Such effects are inconsistent with the Aquatic Conservation Strategy which prohibits logging in Riparian Reserves unless it is needed to meet objectives, and requires that management actions “maintain” and "not retard" ACS objectives, including dead wood. Any purported benefits of riparian thinning must be weighed against the potential adverse effects on dead wood recruitment.

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 at 27.

Dead wood is important to both aquatic and terrestrial purposes of Riparian Reserves. As such, the EA cannot just focus on recruitment of wood to streams, but must also address the need to recruit optimal levels of snag and dead wood to meet the needs of terrestrial wildlife (e.g. primary cavity excavators, secondary cavity users, amphibians, mollusks, lichen, fungi), which were intended to be benefited by Riparian Reserves. In addition, dead wood of all sizes is important to streams and riparian function. In small streams, small wood can even perform the ecological and hydrological functions normally thought to require large wood. If the goal of logging is to create large trees faster, the NEPA analysis should document the size, gradient, and other characteristics of streams adjacent to each logging area and determine the size of wood that can serve key ecological and hydrological functions, then disclose the effects of logging relative to those relevant wood sizes.

In another recent long-term study, an unthinned stand had far more large diameter live trees than a thinned stand decades later. According to a position paper by Kim Kratz, Director of the National Marine Fisheries Service (NMFS) Oregon State Habitat Office:

> “Thinning accelerated the development of large diameter trees by about 20 years such that there were more live trees > 18” dbh in the two decades following thinning, relative

> to the unthinned stand, but this advantage was short-lived. Three decades after thinning, there were more live trees > 18" dbh in the unthinned stand and five decades after thinning there were twice as many live trees >18" dbh in the unthinned stand relative to the thinned stand. A similar trajectory was observed for the live trees > 24" dbh."
>
> Kim Kratz, Ph.D., Issue Paper for Western Oregon. NMFS, Oregon State Habitat Office. 7-23-2010. Appendix 1 at 38.

The NMFS position paper assessed whether heavy thinning of riparian conifer forests leads to more instream wood and concluded that "an unthinned stand will produce a higher number of both live and dead trees across a range of diameter classes and will produce far more dead wood over a much longer time frame relative to a heavily thinned stand. A strategy of thinning to accelerate the development of a few healthy, large-diameter trees does not translate into more large wood in streams. " Kratz at 4 (emphasis added). Kratz also states:

> In regards to stream habitat, many of the negative impacts created by the existing riparian thinning proposals could be largely avoided with <u>wider no-thin buffers</u> (e.g., see Appendix 1) <u>and removing far fewer trees during thinning operations</u>. In examining forest thinning proposals designed to accelerate the development of late-successional forest conditions and restore instream fish habitat, NMFS is finding that, in many cases, they are likely to do neither.
>
> Kratz at 8 (emphasis added).

According to the Silver Creek EA, thinning in Riparian Reserves under the proposed action will result in "[t]he growth of trees both in height and girth [which] will improve shade in the long term and provide future recruitment of large wood to the forest floor and/or to the actual stream itself." EA at 81. However, as illustrated above, recent studies have shown the opposite effect over the longer term.

Pollock and Beechie also emphasize 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." Pollock and Beechie 2014 *citing* Forsman et al., 1984; Carey, 1995; North et al., 1999.

In order to retain options for recruitment of large wood in degraded stream systems, scientific recommendations include retention of trees >12" dbh.

> Removal of trees from riparian zones may delay the recovery of fish habitat. At a minimum, the largest trees (that is, those > 12 inches in diameter at breast height) should be left in riparian areas for future sources of in-stream wood. This would apply to

all streams, as recommended by Anderson and others (1992). Smaller trees could be removed as part of a program for riparian vegetation restoration.

Gordon H. Reeves and Fred H. Everest. 1994. REDUCING HAZARD FOR ENDANGERED SALMON STOCKS. *in* Everett, Richard L., comp. 1994. Restoration of stressed sites, and processes. Gen. Tech. Rep. PNW-GTR-330. Portland, OR: U.S. Department of Agriculture, Forest Service, Pacific Northwest Research Station.

Water quality

In addition to questioning the merits of riparian thinning in terms of dead wood, snag recruitment, and other key riparian habitat structures, we question the proposal to non-commercially thin inner Riparian Reserves due to potential effects on water quality from lack of stream shade and sedimentation (sedimentation will be further addressed in the roads section herein).

First, there is some confusing and misleading information in the EA. On the one hand, the Forest Service asserts that thinning up to 20 feet from streams will be sufficient to ensure sufficient stream shade and protect the fragile microclimate. See EA at 158-162. Yet, when evaluating microclimate and stream temperature, the Forest Service states that there will be minimal effects because buffer widths are 60-300 feet. In the microclimate section, it appears that the full analysis of effects focuses solely on thinning in outer reserves, despite the prescription to also thin the inner reserves. See EA at 162. The Forest Service must assess the impacts of allowing thinning in inner Riparian Reserves on stream temperature and microclimate.

This proposal covers a large area with varying degrees of slope angles, stream orientations, densities, and species diversities, so there is a wide range of variability in effects. In addition, there are multiple studies concluding that thinning in Riparian Reserves—both inner and outer reserves—can increase stream temperatures beyond a level that supports healthy aquatic and riparian ecosystems, which could potentially retard attainment of ACS Objective #4 and contributing to water quality standard violations. See Spies et al at 26. The NMFS position paper referenced above also discusses riparian buffers in more detail and questions the modeling that the Forest Service and Bureau of Land Management are using to determine minimum riparian buffer widths to ensure sufficient stream shade. See Kratz at 14-20. NFMS in part does this due to generalizations made in determining stream buffers, which do not account for variable parameters like stream orientation or sinuosity. Kratz at 17-18.

The Forest Service must also ensure that there are sufficient buffers to protect stream shade and microclimate in this proposal due to the presence of federally listed fish populations, including Chinook, coho, and steelhead, in the project area. Anadromous fish populations require cool water throughout all of their life stages and no cut buffers are essential to ensure sufficient stream shade.

> Stream temperatures are significantly influenced by shading from streamside forests (e.g., Brown 1970, Brown and Krygier 1970, Brazier and Brown 1973). Recent field evidence in Bristish Columbia showed that stream temperature was 3°C higher with a forested buffer of 33 feet wide than in the forested control site, and 1.6°C higher with a 98 foot forested buffer. **By contrast, a recent modeling effort showed that, on average, a 90 foot forested buffer in Oregon forests was likely to keep the temperature increase less than 0.3°C** (upper 95% confidence interval 0.6°C, based on modeled stream temperature using Ripstream, Groom et al. 2011. **This suggests that stream temperatures may still not be protected in many reaches even with a 90 foot buffer.**
>
> Timothy Beechie letter to OR Board of Forestry, July 21, 2015.

In addition, according to the EA, there are three identified 303(d) listed stream segments for water temperature in the project area: Silver Creek, Lake Creek, and Lynx Creek. The EA must indicate the extent of water quality impairment and must disclose the direct and cumulative impacts. The Clean Water Act does not permit de minimus degradation of water quality, especially on streams that are already impaired. 33 U.S.C. § 1323(a)(2)(C).

Connectivity

The ACS objectives of the NWFP also require the Forest Service to "[m]aintain and restore spatial and temporal connectivity within and between watersheds." See ACS Objective 2. Riparian Reserves function as connectivity corridors and provide habitat to sensitive wildlife species like the Van Dyke's salamander. We recommend that the Forest Service consider extending the riparian buffers across key ridgetops in order to provide interbasin connectivity for amphibians and other species.

Summary

For all of the above reasons, the Task Force recommends that the Forest Service refrain from thinning in the inner portion of Riparian Reserves within the Silver Creek project area or at least limit thinning to very young, high density stands on gentle slopes in the outer portion of Reserves, beyond the 100 foot zone where most shade and woody debris recruitment is generated. We recommend maintaining no-cut buffers of at least 130 feet for perennial fish-bearing streams in the entire project area within LSR and maintaining full Riparian Reserve widths in matrix. We also recommend retention of trees >12" dbh in fish-bearing streams, and that trees cut in Riparian Reserves remain on site. In addition, we recommend that only standard thinning be conducted in Riparian Reserves and that an equipment limitation zone be implemented from 50-75' from the outer edge of the no-cut buffer, where possible, especially on steep and unstable slopes. Lastly, we would like clarification on thinning limitations within the inner Riparian Reserves.

Roads

The Task Force is very supportive of the road closures and stabilization proposed in the EA to address terrestrial and aquatic risks. However, as highlighted in our scoping comments, we are very concerned about the effects of road construction, reconstruction, and landings in this proposal, especially due to soil instability issues and landslide occurrences in the project area (note that Figure 9 on slope stability is missing on p. 69). The EA states that there will reconstruction of 64.1 miles of level 2 roads and 14.51 miles of level 1 roads; 7.4 miles of new temporary roads; 855 landings; and 22 stream crossings in the Silver Creek thin proposal. We are particularly concerned with the proposal to build or rebuild stream crossings, create new temporary roads, reconstruct temporary roads, and reopen decommissioned roads. We are also disappointed that the EA failed to include a map with a clear indication of new stream crossings, which should be the minimum information presented to the public through NEPA.

Road density in the Silver Creek subwatershed is extremely high at 5.1 mi/mi2. According to the EA, "road density values greater than 3 mi/mi2 are "Not Properly Functioning" according to the National Marine Fisheries Service's Pathways and Indicators Criteria for Threatened and Endangered Species." EA at 154. In addition, the Silver Creek subwatershed is highly fragmented, with 679 stream crossings on national forest land and 291 stream crossings in the project area alone.

As the EA acknowledges, roads can be a high source of sedimentation and can detrimentally impact water quality and ESA listed fish and their habitat. According to the EA, there will be "substantial road reconstruction of system road including 17.2 miles, 22 crossing[s] and 11 harvest units and associated transportation systems, which are in proximity to listed fish habitat." EA at 177. "Potential risk of road failure and subsequent delivery to spawning habitat is relatively high due to geologic instability in areas of reconstruction." EA at 178. In addition, there are ten harvest units within proximity to listed fish habitat, five of which contain stream crossings (units 28, 29, 31, 32, and 37). Id. Units 28, 31, and 37 have multiple stream crossings within close proximity to listed fish habitat, with unit 37 proposed for an astounding number—13 of the 22 total.

To avoid violation of ACS objective #5, which requires the Forest Service to "[m]aintain and restore the sediment regime under which the aquatic systems evolved", and the ESA, we suggest that the Forest Service remove stream crossings from the proposal, or drop units with stream crossings if no other access alternative is available.

In addition, we are concerned about mitigation measure 6.20, which allows off-season logging with approval from a sale administrator. Off-season logging can result in sedimentation and related water quality and ACS violations. We are concerned that the Forest Service is not adequately staffed to sufficiently monitor sites to ensure violations do not occur.

We also request that new temporary roads or road reconstruction be minimized, especially where the roads could have adversely impact listed fish habitat or result in other harmful aquatic or terrestrial impacts. This is clear evidence that temporary roads are anything but temporary and that, oftentimes, their existence and subsequent impact continues in perpetuity. 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.

Further, 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.

We also 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 within the project area.

In addition, in our scoping comments, we requested that an analysis of temporary roads and road reconstruction and the economic and ecological tradeoffs of individual road segments be conducted. However, we do not see this analysis in the EA. It is critical that the EA evaluate the costs of road reconstruction and thinning versus the benefits, like ecosystem services, that the forest can provide.

Northern Spotted Owl

The Northern Spotted Owl (NSO) 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 (FWS) 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 much of the Silver Creek project area.

The Task Force is concerned about the proximity of some of the plantation units to NSO suitable habitat and the impacts of thinning within NSO critical habitat. Right now, with the negative impact that barred owls are having on spotted owls and the potential uplisting of the NSO to endangered status, 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 critical habitat.

There are currently ten historic NSO activity centers that have core or home ranges that occur within the project area proposed stand boundaries. According to the EA, Unit 29 is located within the home range of the historic NSO site known as Grassy #505, approximately 1.25 miles from the nest site location. Unit 29 contains older, naturally regenerated stands, including a significant amount of trees over 175 years old (see Silver Creek age and QMD maps in the early seral section below). "Unit 29 is also adjacent to unsurveyed suitable NRF habitat and could be within the core area of an undetected NSO site." EA at 107. Yet, the Forest Service is proposing

to conduct regeneration harvest of 33 acres in unit 29 to create early seral habitat for deer and elk, along with 10 acres of thinning (43 acres of suitable habitat removed in total). It is perplexing that the Forest Service would choose to remove suitable foraging habitat in such close proximity to a federally threatened species for the purpose of creating habitat for common game species. The EA even recognizes that "the proposed action is not consistent with the recommendation in the recovery plan to maintain all suitable habitat because 43 acres of suitable foraging habitat will be cut in the proposed action." EA at 111.

We would also like to highlight the potential risks of these proposed actions on NSO populations due to a lack of formal NSO surveys in the project area. Despite informal spot surveys, historic NSO sites must be considered potentially occupied.

To avoid effects to NSO, as well as impacts to marbled murrelet habitat and listed fish (note new temporary road and stream crossing in unit), we request that the Forest Service drop unit 29E from this proposal. We are also concerned about regeneration harvest in unit 37E, as it is immediately adjacent to suitable NSO habitat. We would like to see that unit dropped for that reason and others described in the early seral section below.

Marbled Murrelet

In 1992, due primarily to the extensive harvest of late successional and old growth forest, the FWS listed the population of marbled murrelets in Washington, Oregon, and California (the "tri-state population") as threatened under the Endangered Species Act ("ESA"). 57 Fed. Reg. 45,328 (Oct. 1, 1992). In 1996, FWS designated 3,887,800 acres of land as critical habitat for the murrelet. 61 Fed. Reg. 26,255 (May 24, 1996). Through its critical habitat designation, FWS decided that the identified areas were necessary for the survival and recovery of the tri-state population.

The EA states that Unit 29 provides suitable nest platform trees for marbled murrelets since the stand contains trees up to 100 inches dbh, many snags, and large down wood. EA at 118. In addition, "Suitable nesting habitat occurs adjacent to approximately 10 acres of helicopter units and murrelets that may be nesting in stands adjacent to helicopter units could be exposed to the adverse effects of rotor wash in addition to the high decibel levels of low helicopter overflights multiple times during the proposed action." EA at 119. Further, noise disturbance from logging activities during nesting season would adversely affect 300 acres of potential marbled murrelet nesting habitat in stands adjacent to treatment units. There are also 109 acres of critical habitat in five units (12, 13, 16, 24 and 25) within the project area. EA at 122.

Similar to our discussion in the NSO section above, the Task Force is very concerned about the inclusion of unit 29 in this proposal due to potential direct impacts on marbled murrelets, and requests that the unit is dropped. We are also concerned about the likely to adversely affect determination for both marbled murrelets and their designated critical habitat, considering both individual impacts in this project and the cumulative impacts when combined with the Nisqually Thin and other logging projects occurring on adjacent lands. We are also concerned that no marbled murrelet surveys have been completed in the project area in many years. We

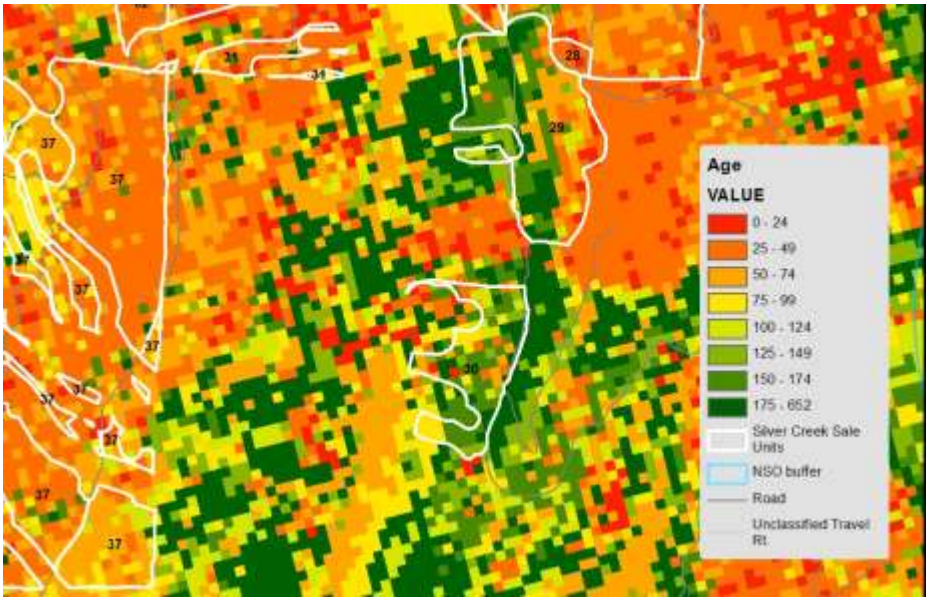
request that the Forest Service protect older stands throughout the project area and consider adjusting helicopter logging prescriptions, shifting the boundaries of those units away from suitable nest sites, or dropping those units altogether.

Early Seral

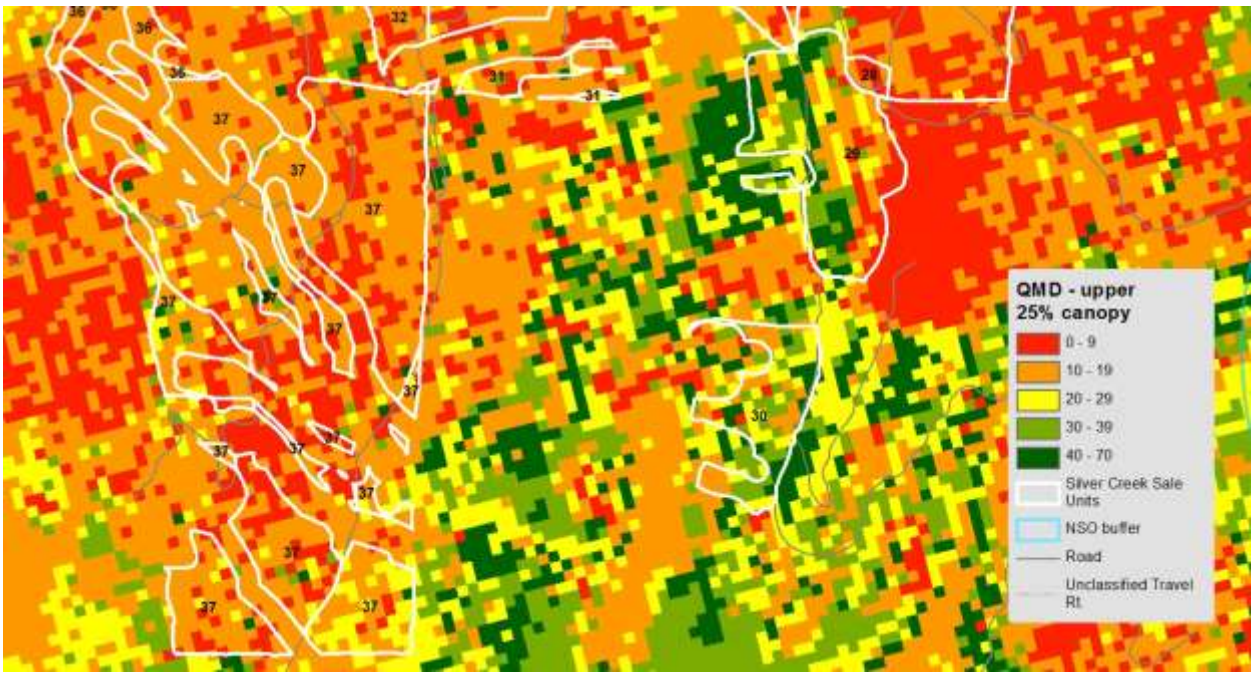
The Task Force specifically takes issue with the purpose and need for early seral habitat for deer and elk forage. We believe that particular statement of need is unreasonable and without scientific support. We specifically requested an assessment illustrating the need to create more early seral habitat for deer and elk in our scoping comments, but see no evidence that any assessment was conducted.

The EA fails to consider the amount of early seral habitat for deer and elk forage on adjacent private and state lands, as well as the additional browse created through other thinning projects in the forest where deer and elk sign is prevalent. There is a significant amount of early seral habitat on private lands adjacent to the project area. In addition, early seral vegetation exists along many streams, rock outcrops, meadows, roadsides, landings, and other disturbed sites throughout the forest. An honest assessment of the early seral shortage must account for the quantity, quality, and functionality of all these early seral forest elements.

As mentioned earlier, we are concerned that some of the units proposed for regeneration harvest are near historic NSO nest sites and/or within NSO foraging and dispersal habitat, as well as marbled murrelet nesting habitat. In addition, regeneration harvest is incredibly controversial, especially at the scale the Forest Service is proposing here. Unit 29E is of particular concern since it contains: mature and old growth habitat (see maps #1 and 2 below); is naturally regenerated and diverse; suitable NSO habitat and close proximity to a historic NSO activity center; marbled murrelet nest platform trees and suitable habitat; and would create a stream crossing in listed fish habitat and new temporary road.



Map #1 – Unit 29 Age Distribution



Map #2 – Unit 29 QMD


Photo #1 – Unit 29E

We are also concerned about other units that contain unstable soils, significant biological diversity, and/or are in proximity to listed fish habitat, including units 38E, 37E, and 28E. For instance, "Unit 38 would have the highest amount of new [soil] disturbance as described in the proposed action, up to approximately 14.7 percent soil disturbance due to construction of a new helicopter landing in a relatively small unit, 8 acres gross (Table 10)." EA at 63. Unit 38E also contains substantial diversity and older stands of trees, as documented in the Task Force's surveys in July 2015, and is close to listed fish habitat. Similarly, we are concerned about regeneration harvest in unit 37E. The Task Force also surveyed that unit in July and documented very sensitive soils, animal trails, extensive burrows, high biological diversity, and significant large down wood. Unit 37E is also in close proximity to listed fish habitat and contains a disproportionate amount of new stream crossings (13 or 22 in the project area).

Consequently, the Task Force requests that the Forest Service modify the proposal by dropping units 29E, 28E, 37E, and 38E and substitute thinning for regeneration harvest on the remaining matrix units.

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