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Nikia Hernandez, District Ranger
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Via email: comments-pacificnorthwest-giffordpinchot-cowlitzvalley@usda.gov and SM.FS.R6commentGP5@usda.gov

RE: Yellowjacket Scoping Comments

Dear Mr. Hernandez,

Thank you for the opportunity to comment on the Yellowjacket proposed action. The Cascade Forest Conservancy's (CFC) mission is to protect and sustain forests, streams, wildlife, and communities in the heart of the Cascades through conservation, education, and advocacy. We represent over 12,000 members and supporters who share our vision for a forest where wild places exist and wildlife thrives.

CFC supports many aspects of this project, such as instream restoration, beaver dam analog (BDA) installation, road decommissioning and stabilization, huckleberry enhancement, and thinning in young, dense plantations. Our concerns with this project include:

- 217 acres of regeneration harvest;
    - 106 acres of regeneration harvest occurring in mature forest stands nearly 100 years old;
    - Regeneration harvest in northern spotted owl (NSO) circles and mature forest stands;
    - Regeneration openings exceeding the Gifford Pinchot National Forest (GPNF) Forest Plan openings limit;
- Commercial harvest within riparian reserves;
- Forest road access for WATVs (wheeled all-terrain vehicle);
- "Leave Thin" treatment in areas that do not need treatment; and
- Potential harvest in known habitat areas for sensitive species and other areas containing large habitat trees or old-growth.

CFC's concerns are explained in further detail below.

Regeneration Harvest

CFC is concerned with the proposed regeneration harvest on 217 acres of the Yellowjacket planning area. In addition to the ecological damage in the near-term and a questionable basis of need for such large-scale regeneration harvest, we are most concerned with the inclusion of 106 acres proposed in 95-year old stands and regeneration harvest in NSO circles.

There is no ecological need to regenerate moist forests in the 80 to 120-year old age range; these forests are poised to be the next cohort of old-growth forests. Mechanical treatment can hinder this process, disrupt soil communities, exacerbate climate change impacts associated with temperature and drought, and introduce non-native plants. Although we acknowledge the Forest Service's concern that these stands are at the optimum time to maximize timber volume production, the GPNF has a severe deficit of late seral habitat on the landscape, and regenerating these stands will take another 95 years to replenish this depleted habitat. Unit 138 specifically contains stands of trees far older than the overall stand age of 95 years, with various areas containing trees over 40 inches in diameter at breast height.

Addressing the severe deficit of late seral habitat on the landscape can only be achieved by leaving the soon-to-be late seral forest to develop and accelerating conditions in mid-seral stands through thinning. The Yellowjacket regeneration harvest proposal notes the creation of early seral habitat as a benefit to regeneration harvest; however, this habitat does not need to be managed for additional creation, as increased size and frequency of wildfires in the GPNF and across the west is naturally creating patches of this type of early successional habitat. Removing late seral or soon-to-be late seral forests exacerbates the issue of dwindling and fragmented late seral forest. The stand age and individual trees in units 138, 128M, and 141.2 are not appropriate candidates for regeneration harvest. We recommend a thinning prescription for these older stands—to accelerate old-growth and late seral conditions—rather than a regeneration harvest prescription.

Additionally, the Gifford Pinchot National Forest Land and Resource Management Plan (LRMP) provides guidance on the permissible size of openings for regeneration harvest and permitted exceptions to the management direction:

"Openings created by even-aged timber harvesting methods will not exceed limits established by the Regional Land Management Guide. Openings in the Douglas-fir type of the coastal Douglas-fir zone (Western Hemlock Working Group on the Gifford Pinchot National Forest) will be no larger than 60 acres and no larger than 40 acres elsewhere. Exceptions are permitted in the following cases:
a. When natural catastrophic situations such as fires, windstorms, or insect and disease attacks occur.
b. When larger openings will reduce resource damage to soils, water, fish and riparian values. This might include the use of a logging system which would minimize overall resource disturbance.
c. When required to prevent the spread of insects or disease.
d. When visual resource management requires shaping and blending of openings.
e. When existing shelterwood units are larger than the maximum size."[1]

The Yellowjacket proposal for openings does not fall under any of the permitted exceptions required by the LRMP and established by the Regional Land Management Guide. CFC requests regeneration openings are consistent with the LRMP.

Northern Spotted Owl

The Forest Service has planned for a substantial portion of the proposed project to occur in northern spotted owl circles; this is a considerable concern for the recovery of the species. CFC is most concerned with regeneration harvest proposed in a number of northern spotted owl circles. Specifically, units 138 and 19 overlap one NSO circle, and unit 96 overlaps three NSO circles—this is unprecedented in the Cowlitz Valley Ranger District.

Northern spotted owl numbers are already drastically dwindling due to the lack of available preferred habitat, and regeneration harvest converts spotted owl habitat to non-habitat.

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[1] Gifford Pinchot National Forest Land and Resource Management Plan, p.49 (1990).

Conducting regeneration harvest in the spotted owl's prime habitat is a heavy disturbance that will likely lead to decreased reproduction and/or site abandonment, preventing the recovery of this highly threatened species. CFC requests the Forest Service avoid regeneration harvest within and near NSO circles and maintain 60% canopy cover in any units containing or overlapping NSO circles.

Riparian Reserves

The Yellowjacket scoping proposal outlines a substantial amount of timber harvest in riparian reserves. Riparian reserves are protective buffers along streams, lakes, wetlands, and other aquatic features designed to enhance habitat for riparian-dependent organisms, maintain water quality, provide ecologically complex dispersal corridors for terrestrial species, and provide connectivity within watersheds. They are not intended as a source of commercial timber harvest, and any harvest must meet the Northwest Forest Plan's Aquatic Conservation Strategy. CFC requests that an analysis of units within riparian reserves include a "no-cut" buffer that is sufficient to protect water quality and the microclimate of the site, as supported by the best available science.

Commercial Thinning

CFC is generally supportive of the proposed thinning prescriptions for Yellowjacket. Thinning young, dense plantations can improve stand resiliency, increase species diversity, and enhance wildlife habitat. Although there are ecological benefits to thinning plantation stands, we also recognize there are ecological trade-offs, including a near-term loss of habitat features and home ranges currently in use, potential fragmentation of habitat, construction of temporary roads, soil compaction, spreading of invasive species, and impacts to the microclimate of riparian areas. In this proposal, several thinning units contain particularly large trees and areas with high habitat potential. Specifically this includes units 25 (southeast portion of the unit), 44 (along the eastern boundary), 45 (scattered), 59 (in one of the central drainages), 69M (western section), 76 (in riparian zones near the southwestern boundary), 112 (southern boundary), 129 (western portion), and 159 (scattered). We request that no-cut buffers are outlined for these areas. Additionally, when designing thinning prescriptions for these units, there should be direction to retain trees over 35 inches in diameter due to the particular role these remaining trees serve for species that live in and around them.

A “Leave Thin” prescription—where some trees are felled and left and some are moved off-site for other restoration purposes—can be a useful approach in balancing thinning needs and other restoration objectives. But, in some of the units currently proposed for this treatment, they would be best served by being left alone. In particular, the units along road 2816 (units 146 to 155) already contain notable heterogeneity, with regard to unique habitats and canopy cohorts. One striking feature of this area is its high biodiversity and lack of non-native plants. It would be most unfortunate to bring in a heavy influx of machines, people, and free-riding seeds that will almost certainly shift this native/non-native balance toward the latter. This is especially relevant when the objective for the prescription is to improve the habitat. There are many plantation stands and other projects that need attention; this area is not one of them.

Fishers

Fishers are listed as an endangered species by the Washington Fish and Wildlife Commission. CFC has detected fishers both within and near several harvest units in the Yellowjacket planning area. Fishers are habitat specialists and are sensitive to impacts from logging in their home ranges, especially if logging removes denning trees and disturbs the habitat features that fishers use for resting locations as they travel through their core areas. Disruptions associated with these two habitat factors have a known impact on survival and site fidelity.

On October 28, 2019, at 7:52 a.m, CFC wildlife cameras detected a fisher in the western part of unit 43 (at 46.422288, -121.838464). Unit 43 is a naturally regenerated forest stand (with an origin date listed as 1930). During on-the-ground investigation, we found this unit to contain areas with healthy and complex understories, multi-story canopies in existence or forming, and other traits suggesting habitat importance and a natural trajectory toward old-growth. Due to these factors, we request that further surveys be carried out to delineate areas in this unit that contain potential high-quality fisher habitat and surveys to determine if den trees exist in the unit. If den trees are found within the unit, we request that some or all of this unit be dropped. For areas found to have high habitat suitability for species such as fisher, a no-cut buffer should be applied to help ensure a successful recovery of fishers in the area. Additionally, unit 42, which sits just downslope/northwest, has a prescription of “Thin” yet already contains areas of

high-quality habitat and forest heterogeneity and should receive similar types of survey work and precautionary treatment to avoid harm to the local fisher population.

On December 21, 2019 at 3:28 a.m., farther up the Yellowjacket Creek drainage, another fisher was detected between units 86, 88, 89, and 90 (at 46.363838, -121.856673). Unit 86 is the closest to the fisher detection and sits on the same elevational plane on which this fisher was observed. CFC requests that this unit also be investigated and considered for removal or modification. Spatial analysis and local observations suggest that various forest stands within and surrounding these units contain patches of older trees and complex habitat that should be left in place to continue their trajectory toward old-growth and provide necessary habitat for the local fisher population's survival. Of particular importance for species like the fisher are large trees, large snags, structural complexity, and intact riparian zones, with the arboreal features serving as important areas for den and resting sites.

WATV Access

While many WATV (wheeled all-terrain vehicle) users ride responsibly, respecting identified routes, other forest users, and sensitive habitat, we are concerned that opening up such a vast array of forest road loops to WATVs will lead to a massive and difficult to quantify increase in the impact of loud machines on terrestrial wildlife and sedimentation on aquatic systems. In addition, it would create unavoidable complications and difficulties with enforcement on nearby roads and would likely lead to more unauthorized trails and routes stemming from the designated route, as has been observed in the Wind River watershed where the agency is moving in the opposite direction (closing illegal WATV loops) trying to deal with this issue. WATVs and other off-road vehicles are fundamentally designed, marketed, and sold for off-road use. By creating and sanctioning new motorized inlets into currently unimpacted areas, we can expect an increase and spread in known negative impacts such as soil compaction, streambed and wetland degradation, various degrees of impact to fish and wildlife habitat, and a more rapid spread of invasive plants and noise pollution. Sufficient law enforcement and capacity should be in place before this type of change is considered in order to create more understanding of and accountability for illegal off-roading.

Overall, as this activity spreads to more and more areas—even in roadless areas such as those on and around the Boundary Trail, Spencer Butte Trail, Juniper Ridge Trail, Summit Prairie Trail, Dark Meadow Trail, and more—we are hearing from members of the public about the increasing difficulty for hikers, campers, and berry pickers to find the quiet and solitude that many hope to experience in the deepest parts of the forest. This is in addition to the fact that these trails are becoming increasingly difficult to traverse due to the ruts caused by motorbikes. We feel this is an important situation to consider. To address part of the juggling act inherent in balancing WATV use with that of all other forest users—most of whom prefer to find places away from the noise, smell, and the rapid degradation of trails—there should be a commensurate addition of hiking trails, more resources directed toward enforcement, a quantification of impacts, and attention going toward the maintenance of current WATV trails before introducing new areas of impact that will suffer the same quick degradation and reduction in use by other members of the public.

Instream Restoration and BDA

CFC supports the Forest Service's proposal to install log complexes along the Cispus River and Yellowjacket Creek, as well as targeting Pinto Creek, Lambert Creek, and High Bridge Creek for restoration. There is a pressing need to restore fish habitat in the Gifford Pinchot National Forest, and instream wood helps diversify aquatic ecosystems by creating deep pools and other important habitat features.

Additionally, we are supportive of the invasives removal and BDA installation at Beetree Pond. Beaver dams can help retain more water in the form of ponds and side channels, creating a saturated landscape above and below ground that can stay wet throughout the year–providing much-needed aquatic habitat through droughts and hot summers.

Huckleberry Enhancement

CFC is generally supportive of huckleberry enhancement. We have some concerns with the size of the commercial huckleberry harvest units and the proposal for treatment in areas where huckleberries are already abundant. The areas where huckleberry plants are already healthy and fruiting at above-average rates should be treated differently from areas where little to no fruiting occurs, in order to strike a better balance between near-term impacts and desired future

conditions. These are great candidate stands for a light-touch, “leave thin” strategy. Although not always possible, we support huckleberry enhancement activities that reduce the use of heavy machinery to reduce soil disturbance and near-term impacts. We support the use of low-intensity prescribed fire and would like to see this approach considered if appropriate conditions allow.

Conclusion

Actions proposed in the Yellowjacket proposal can benefit the landscape by increasing heterogeneity in plantations, improving aquatic habitat, supporting huckleberry production, and restoring habitat connectivity by decommissioning and closing roads. However, there are important adjustments in the plan that should be implemented before the next phase of the planning process.

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

Sincerely,

Lucy Brookham, Policy Manager