



# GIFFORD PINCHOT TASK FORCE

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Darren Cross  
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Via email: [comments-pacificnorthwest-giffordpinchot-mtadams@fs.fed.us](mailto:comments-pacificnorthwest-giffordpinchot-mtadams@fs.fed.us)

Re: Upper White Salmon Vegetation Project scoping comments

Dear Mr. Cross,

Thank you for the opportunity to comment on the proposed Upper White Salmon Vegetation Project. We look forward to taking part in the upcoming steps of the project design. The mission of the Gifford Pinchot Task Force (Task Force) is to protect and sustain forests, streams, wildlife, and communities in the heart of the Cascades through conservation, education, and advocacy. We represent 7,000 members and supporters who share our vision of conserving and restoring healthy aquatic and terrestrial ecosystems throughout the Pacific Northwest.

The Task Force is supportive of many parts of this project, however, we have significant concerns about certain aspects of it. We will outline these below and will attempt to clarify our positions as they relate to the objectives of the plan and the potential benefits of this project.

## **Riparian Reserves**

While riparian prescriptions are not outlined in the scoping comments, we want to ensure that sufficient riparian buffers are considered in the creation of the project plan. In addition to sedimentation and impacts to fish habitat that can result from logging in and near Riparian Reserves, there are other important issues that should be considered. The role of Riparian Reserves as areas of climate refugia is an increasingly important consideration and one that highlights the need for caution and wider buffers than would be presumed to directly affect habitat and sediment delivery. And, as of 2012, it is now a planning requirement to consider the effects of climate change and related ecosystem interactions in management projects. Riparian areas represent some of the wettest and coolest locations in the project area and steps should be taken to maintain this. The inherent resilience of these areas to climate change and the potential increase in wildfires highlights the importance of letting these areas persist naturally. Thinning in Riparian Reserves is not expected to increase old growth characteristics over the long-term (Pollack and Beechie 2014). Further, thinning in riparian areas to decrease wildfire potential or severity is not supported in the scientific literature and would require dramatic and ecologically-destructive degrees of logging to measurably reduce fire risk. The colonization of invasive plants from logging within and near riparian areas is a concern that would only be exacerbated with an opened canopy and increased stressors brought on by climate change. This is particularly important for riparian areas, which can serve as vectors for the spread of invasive plants. In addition, soil disturbance from mechanical treatment can negatively impact soils and understory plant communities, which interact with and affect both the aquatic and terrestrial components of riparian areas.

The Aquatic Conservation Strategy (ACS) of the Northwest Forest Plan prohibits thinning in Riparian Reserves unless needed to attain ACS objectives. The agency must 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 the most appropriate method to protect aquatic systems. See Kim Kratz, Ph.D., Issue Paper for Western Oregon. NMFS, Oregon State Habitat Office. 7-23-2010. Pollack and Beechie (2014) 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.” 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 to consider other important habitat components and unintended impacts. Thinning in Riparian Reserves can also “increase stream temperatures beyond a level that supports healthy aquatic and riparian ecosystems,” potentially slowing the attainment of ACS Objective #4 (Id. at 26) and contributing to water quality standard violations.

As project plans are developed, we hope to see the inclusion of adequate and protective no-cut buffers to ensure holistic aquatic and riparian health in the Upper White Salmon Vegetation Project area.

### **Northern spotted owl habitat**

The northern spotted owl was listed as a threatened species in 1990 due to widespread loss of old-growth forest habitat. 55 Fed. Reg. 26,114 (June 26, 1990). In 2013, The U.S. Fish and Wildlife Service designated revised critical habitat for the northern spotted owl under the Endangered Species Act. This includes areas in the Upper White Salmon Vegetation Project area.

The Task Force is concerned about the proximity of some of the Matrix and LSR sale units to northern spotted owl nests and the impacts of active management within critical habitat. While some management in these particular forests can have long-term positive impacts on habitat, there are short-term impacts that are significant and should be considered (Truex and Zielinski 2013; Hessberg et al. 2016). A landscape perspective and analysis of cumulative impacts are essential for this project area. Considering recent wildfires and heavy logging on nearby state, private, and tribal lands, it is imperative to maintain a sufficient amount of unmanaged, dense, and valuable northern spotted owl habitat. By using a landscape-scale approach that considers surrounding impacts, as well as the unique roles of south and north slopes and ridgetops and valley bottoms, the Forest Service can tailor a plan to both protect valuable habitat while promoting long-term resilience in the area (Churchill et al. 2013; Hessberg et al. 2015).

Certain sale units in the Upper White Salmon Vegetation Project area (units 300232, 300661, 300659, 300586, 300488, 300519, 300525, 300474, 303407, 300544, 303441, and 300561) are within designated critical habitat *and* inside a 0.7-mile radius circle of a documented northern spotted owl nest site (an owl circle). Three sale units, 300232, 300368, and 300661, are abutting a nest site. Due to a dearth of recent surveys and the increasing difficulty in obtaining a “presence” observation when carrying out vocal surveys for northern spotted owl, it is critical to assume presence, even if there have not been recent sightings. Northern spotted owls have strong site fidelity and have been documented to return to past nest sites years after disturbance or vacancy. Therefore, cautiously following management recommendations in the owl circles is an important step in supporting population viability in the face of threats from logging, wildfires, and barred owls.

It is our understanding that there will not be heavy thinning within owl circles in the Upper White Salmon Vegetation Project area. This is something we support and that will help ensure the health of northern spotted owl populations and other old growth-dependent species that reside in these forests. We are, however, concerned about negative impacts from the sale units that are near the documented nest sites

within the project area. We look forward to working together to find strategies to address this and to support proper protections for nest sites, owl circles, and critical old growth habitat.

## **Roads**

We encourage the agency to identify roads for decommissioning or closure and stabilization within the project area. We also encourage the agency to identify user-created routes in the forest that are not designated roads and propose solutions to block access and restore these areas.

Timber sales represent an important opportunity to incrementally decrease the amount of road miles in the over-sized road system of the Gifford Pinchot National Forest (GPNF), an amount that carries a significant ecological cost (Eigenbrod et al. 2008; Christen and Matlack 2009; Neary et al. 2009; Benitez-Lopez et al 2010) and that surpasses the agencies' maintenance abilities. As we have seen in recent months, roads in the GPNF are susceptible to failure from high flow events. Lowering the amount of road miles in the forest will allow maintenance to be directed where access is most critical and to help create a sustainable road system.

Removal of roads has been found to increase the amount and quality of wildlife habitat, lessen the spread of invasive plants, decrease sedimentation in streams and the severity of high flow events, decrease soil compaction and alterations of local microclimates, and increase overall habitat connectivity, which is an increasingly important consideration in the face of climate change.

The recently completed Travel Analysis Plan of the GPNF can serve as a baseline blueprint for road closure priorities. However, by not considering the existence and utility of multiple access routes to timber sale units and overestimating the need of the majority of system roads, many unneeded yet damaging roads were cited as "needed." In light of this, project-by-project investigation is needed to identify true needs of various roads and to identify a realistic view of priorities for road closure. Hydrologists and fish biologists of the agency are likely best suited to identify these areas within the project area. Our RoadRight analysis, which can be found here <https://gptaskforce.org/our-work/forest-roads-1/roadright-analysis-report>, can also be used to assist in identifying roads that represent the highest risk for different variables (aquatic health, wildlife, and quiet recreation).

We understand that temporary roads will likely be created (or re-opened) to allow access to timber sale units. These roads often remain open on the landscape and become areas of negative ecological impact many years after the project is complete. Steps to sufficiently berm or close these temporary roads at the end of the project should be outlined to assist and speed up the recovery of these areas. Additionally, revegetation in the form of planting and seeding should also be outlined in the plan. Stream crossings represent a major potential impact to the health of aquatic systems. We ask that every effort be made to avoid stream crossings and temporary roads to sale units and to remove those proposed units where access is difficult without significant road building and stream crossing activity.

## **Salvage**

According to the scoping notice, some of the project area includes salvage logging. We understand that the objectives for the salvage areas are to create and/or maintain a sufficient fire break (along FR 82) and to remove trees that have died from bugs and disease. Although some of the areas of current mortality are in a stressed and unhealthy state, these areas do have habitat value and deserve ecologically-appropriate mitigation steps. We look forward to seeing a specific outline of the approach to this part of the plan to ensure that the retention of snags is sufficient to support continued habitat viability for snag-dependent species, and that management operations are carried out in a manner which lessens negative impacts for plants and animals that are particularly sensitive to mechanical disturbance. The project could have a

detrimental effect on soil productivity in the form of puddling, displacement, erosion, compaction, and loss of organic matter in the soil.

We understand the value of creating an effective fire break along road 82 and lessening fuel loads in areas of heavy mortality. Our main concerns with this aspect of the plan revolve around maintaining a sufficient density of snags and focusing retention on large trees, living trees, and important plant communities.

### **Early Seral**

Considering the large amount of early seral habitat in surrounding areas, we are pleased to see that early seral habitat creation is not included in the plan. Local deer and elk populations are currently robust and the need for more early seral habitat on the forest is low, so we expect this issue to not be an area of concern for this or upcoming management projects.

### **Prescribed fire**

For the restorative value of actively managing these particular forests to be realized, prescribed fire is highly recommended as a follow-up action. This aspect is well understood in the literature (Brown 2004; North et al. 2009; Truex and Zielinski 2013; Stine et al. 2014; Hessberg et al. 2015) and should be noted as a concurrent and/or follow-up requirement for the stands on the eastern half of the project area that are proposed for thinning.

### **Conclusion**

The Task Force greatly appreciates your consideration of our comments. We look forward to further discussing the details of the project.

Sincerely,



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Conservation Science Director  
Gifford Pinchot Task Force

Darvel Lloyd  
Chair of the Board of Directors  
Friends of Mount Adams