



# GIFFORD PINCHOT TASK FORCE

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January 15, 2015

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

Re: Silver Creek Thin scoping 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 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.

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 scoping notice, some of the project area includes dense stands of primarily Douglas fir that are 40-80 years old, which fits that criteria. However, we have concerns about thinning in naturally regenerated stands that are 85-125 years old and in riparian reserves.

We request that the Forest Service consider an alternative in its environmental analysis that limits thinning in mature naturally regenerated complex stands and riparian reserves. We also recommend that the Forest Service use variable retention thinning methods, with "gaps" that are kept small and situated away from: important habitat features (e.g. snags and clumps of large wood), streams at the appropriate full buffer widths, and wildlife corridors.

The Task Force's concerns related to the commercial thinning portion of this project are explained in further detail below.

## **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. 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. This is especially important to note since future large woody debris recruitment potential is considered generally low in the Upper Cowlitz River subbasin, including Silver Creek. See WRIA 26 Limiting Factors Analysis 2000.

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.

In addition, Silver Creek is currently listed as Category 5 polluted water body and is currently on the Clean Water Act Section 303(d) list due to high temperature. Thinning in riparian reserves could reduce stream cover and further increase the temperature of the stream.

Additionally, the Silver Creek Thin project area contains federally listed salmonids, including Chinook, coho, and winter steelhead, which are federal threatened under the Endangered Species Act. See Upper Cowlitz Subbasin Plan 2004. According to a limited factor assessment for salmon and steelhead in WRIA 26, sedimentation “limits both quantity and quality of fish production within the Upper Cowlitz River Subbasin,” which includes the project area. See WRIA 26 Limiting Factors Analysis 2000. 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 Silver Creek Thin 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 also recommend that any trees cut in Riparian Reserves are left on site.

### **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 (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 Silver Creek Thin 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.

### **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.

We hope that the Forest Service will make an effort to produce snag trees for this species, which is dependent on late successional and old growth forest trees. We are also supportive of leaving areas with important habitat outside of any gaps.

### **Naturally regenerated stands**

The Task Force continues to be concerned that the Forest Service is focusing on thinning older naturally regenerated stands. Older naturally regenerated stands that are complex often provide suitable habitat for spotted owls and other terrestrial and aquatic wildlife. As such, they should be avoided or only thinned under limited circumstances. In the past, thinning projects that have included natural stands in the analysis have been controversial in the Cowlitz Valley Ranger District. If the district focused on younger plantation stands and limited simple natural stands, projects would move forward at a quicker more efficient pace. We urge the Forest Service to consider focusing on younger plantation stands where there is collaborative agreement on the economic and ecological benefits of thinning.

### **Roads**

We 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, 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.

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/km<sup>2</sup> (1.0 mi/mi<sup>2</sup>) 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.

### **Early Seral**

The scoping notice states 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 (with the aforementioned caveats), we are 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 they be kept small and 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 further discussing this project with you as you develop the environmental assessment.

Sincerely,

/s/ Laurele Fulkerson

Laurele Fulkerson  
Policy Director