

Last Friday (2-7-20) I visited the Flat Country timber sale with a group of 9 Cascadia Wildlands field surveying volunteers. We explored units 1970 and 1300 in the sale, both older units containing significant waterways and late successional characteristics.

Unit 1970 is listed in the EIS as 143 years old, but contains pockets of much older forest, most notably on the eastern steeper half of the unit. Group members measured an 81" douglas fir along the steep ridge, and noted that the average size in this area is between 45-60", with scattered legacy trees throughout. This area contains an emerging understory and hosts diverse tree species including hemlock, fir and cedar.



*Typical stand Unit 1970*



*Seep in Unit 1970*

The southwestern portion of this unit also contains scattered legacy trees and is full of water.

The bog along the outer edge of the western side of the unit has created a wetland area that carries into the unit itself. About 300-400 feet from the western edge of the unit, there is a seep that runs north-south, and supports a line of old growth cedar along its length. We were unable to walk the entire area of this unit, but based on the topography would guess that there is more water to be found in the lowland half.

Additionally, there are heavy flowing streams on both sides of road 2647000 as it winds back northward through the middle of the unit. In the small section of forest between the

curb of road 256700, there is a 60" hemlock next to the stream, and a large culvert upstream where it intersects with the road. Impacts to fish should be considered given the existing impacts from the established road in this small, already bifurcated old stand.

Unit 1300 is also full of water. Anderson creek runs along the northern part of the unit, and there is another significant creek about 200 feet into the unit going north from road 2657000, and another just north of



*Creek 200ft north of road in Unit 1300*

that. Considering the attention to bull trout in Anderson Creek, these waterways should be amply buffered for fish habitat.



*Old Grove Unit 1300 East*

Additionally, the forest stands in this unit are old, multi-aged stands that contain late successional qualities. There is a small old growth stand on the eastern side of the unit where it juts out between the two creeks south of Anderson creek. Page 127 of the Flat Country EIS shows this area as a harvest unit. After visiting this stand, we feel strongly that it should be dropped from consideration for commercial harvest.

Unit 1300 also contains a lot of downed old wood and existing natural gaps. There is one 1.5-2 acre meadow in the southeastern corner of the unit with a ring of old growth cedars along its perimeter. Given the presence of this existing meadow and significant natural gaps in the forest canopy, there is no need to create more early seral forest in this area.

I urge you to adopt Alternative 3—no regeneration harvest and no treatment in stands over 80 years old. The Forest Service should not be conducting regeneration harvest in old forest stands when so little old forest remains on the landscape. The Forest Service especially should not be conducting regeneration harvest in stands that contain classic old growth characteristics such as in unit 1970, which is currently slated for 60 acres of shelterwood harvest. We are concerned that so many of the stands that the Forest Service plans for heavy commercial thinning are old, multi-cohort stands, and we urge the Forest Service to reconsider its preferred alternative for management of these important places.



*Meadow Unit 1300*

Signed,  
Samantha Krop  
Grassroots Organizer  
Cascadia Wildlands  
February 11<sup>th</sup> 2020