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submitted electronically at www.fs.usda.gov/project/giffordpinchot/?project=60595

Re: Yellowjacket Revised Draft Environmental Assessment

Dear Ms. Tanner,

I have several comments on the Yellowjacket project.

Flawed Public Outreach

Your public outreach regarding the availability of this latest National Environmental Policy Act (NEPA) document is flawed. Despite having commented on the prior scoping and draft environmental assessment for this project, I never received the announcement of the release of the revised draft environmental assessment. I learned about this latest public comment opportunity through the Cascade Forest Conservancy.

I know that you received my prior comments because I am listed in Appendix D and I am commenter C.21 in Appendix E. I have scoured my email folders, including my spam folder, but I did not receive an electronic announcement through email and I did not receive a printed announcement through postal mail, either. Thankfully, I have other means of learning about the availability of Forest Service NEPA documents. I assume this was an accidental oversight, but there may be other commenters with legitimate standing who also did not receive your announcement so I want to bring it to your attention and request that you verify that all previous interested parties who have commented in the past are ensured the opportunity to comment on the new Revised Draft Environmental Assessment.

Furthermore, Concern #24 in Appendix E misinterpreted my comments. I am not a motorized trail user advocating for mixed use roads. I am a hiker concerned about passenger vehicle access to trailheads in the project area and I would like to see roads leading to trailheads that have been closed by slides and washouts be restored to high clearance passenger vehicle (not 4x4 pickups) access as part of this project.

Impacts on Northern Spotted Owl Habitat

There are 28 known historic Northern Spotted Owl (NSO) sites or territories within the Yellowjacket project area, all are now presumably devoid of NSO presence due to past mismanagement that either reduced the habitat below the threshold of suitable habitat and/or allowed the invasion of Barred Owls into the NSO territories.

The 2011 Northern Spotted Owl Recovery Plan identified habitat loss as one of the two primary threats to the survival and recovery of northern spotted owls, Barred Owls being the other (USFWS 2011, pp. II-4, III-62). The Biological Evaluation attached to this project states: "Past timber harvest in the Yellowjacket Creek and Cispus River-Camp Creek watersheds has greatly reduced the amount of

suitable NSO habitat. Over the past 6 decades approximately 6,300 acres of large tree (suitable NSO) habitat has been regenerated by clear cut harvest treatments in those watersheds. The proposed action includes approximately 1400 acres of thinning treatments in suitable NSO habitat within these watersheds. These are largely the “Cispus burn” stands that have naturally regenerated from fires between 1910 and 1933 that have high canopy cover, large overstory trees, and old-growth legacy features that survived the Cispus burns. These legacy features include large live old-growth trees, large diameter snags and large down wood. The proposed treatments would degrade the habitat quality of these stands...”

Furthermore, the Forest Service cannot pass all the blame for the functional extirpation of the NSO onto the Barred Owl. The U.S. Fish and Wildlife Service (FWS) has just released its Barred Owl Management Strategy for public comment. On page 7, the Strategy specifically states: “The Strategy does not address spotted owl habitat or other spotted owl conservation issues, including those addressed under other conservation efforts, management planning, or legal requirements. The Strategy is not a replacement for, and would not result in any change in, northern spotted owl designated critical habitat...”

On page 9, the FWS wrote: “The primary stressors affecting the northern spotted owl's current biological status include lag effects of past habitat loss, continued timber harvest, wildfire, and incursion of the nonnative northern barred owl.” The FWS has repeatedly found that uplisting the NSO from threatened to endangered is warranted but precluded by higher priority listing actions. On page 10, the FWS wrote: “Habitat protection and management remains an important component of the conservation and recovery of the northern spotted owl.”

Although the U.S. Fish and Wildlife Service Biological Opinion gave the Forest Service a pass on this project as not likely to adversely affect the NSO, most likely because the species already has been functionally extirpated from the project area, nonetheless, I look forward to a future when the NSO is restored to its former range and I can hear and see NSOs again like I did in the 1980s. That can only happen if the historic habitat is protected intact and the habitat areas below the suitable habitat threshold are restored as quickly as possible to meet or exceed suitable habitat requirements.

Habitat connectivity is essential to NSO recovery. The estimated 2-3 NSO sites in the project area where the species may still remain may be the nucleus of future NSO dispersal, particularly if the Barred Owl Management Strategy is implemented in this area. If habitat has not changed substantially, previous use by NSO demonstrates the ability of these areas to support them in the future. The proposed action would not retain approximately 1,044 acres of dispersal habitat due to logging and huckleberry enhancements. Additionally, approximately 371 acres would be cleared for landings and new roads that would make that land unsuitable for dispersal habitat for 40-60 years. Therefore, I oppose the proposed aggressive thinning in NSO habitat and I urge that it be removed from the project proposal.

Road Network

I support the proposed decommissioning of approximately 11.35 miles of roads, including removing all improvements and recontouring the roadbed, closing and revegetation, and the conversion of approximately 6.85 miles of existing roads from maintenance level 2 (open road) to a maintenance level 1 (closed, administrative use only), including physical closure and ecological stabilization. Roads fragment wildlife habitat and increase disturbance. As the Wildlife Report pointed out, the road density in the Yellowjacket project area far exceeds the standards for wildlife habitat in deer and elk winter range. “The proposed road closing and decommissioning in the Yellowjacket project will slightly reduce existing road densities in these watersheds but that will be offset by new road reconstruction and

temporary road construction, so in deer and elk winter range open road densities will remain at a high terrestrial risk level in the Cispus River-Camp Creek subwatershed.”

North Fork Campground

The Forest severely lacks capacity to meet the demand for developed campground recreation, particularly in 2023 with the closure of Iron Creek Campground due to a user-caused fire. Updating and redevelopment of the North Fork Campground to its full potential is long overdue and should proceed while funding is available from sources such as the Great American Outdoors Act.

Road Access to Trailheads

Revisiting my misunderstood comment from the previous draft environmental assessment, I identified road access to trailheads for non-motorized users as another issue to be considered. I urge that high clearance passenger vehicle access be restored to these trailheads: FR 2810 to access the Yellowjacket Pass Trail #1A; FR 2816 to access the Badger Ridge Trail #257; FR 2904 to access the Juniper Ridge Trail #261 and Tongue Mountain Trail #294 at Lambert Saddle; FR 2908 to access the Langille Ridge Trail #259. Long ago (1980s-1990s), I was able to drive to these trailheads in my passenger vehicle. The deterioration of the Forest Road System due to severe weather such as floods and lack of maintenance has made these trails inaccessible to many non-motorized users.

I recently participated in a Sustainable Trails meeting at the Gifford Pinchot National Forest headquarters. In my opinion, one aspect of Sustainable Trails is providing equitable access to the trails on the national forest. These include primary roads (two digit numbers) with deep erosion channels, potholes, sloughing, slumping and other damage that threaten a hiker’s vehicle. Neglected roads have brush and trees growing into the road right-of-way that block sight distance and sometimes to the extent that a hiker risks pinstriping the paint job on her vehicle to get to a trailhead. If there is a system trailhead, there should be a commitment to maintain access for hikers who don’t drive jeeps or humvees.

Thank you for the opportunity to comment on the Revised Draft Environmental Assessment,

Sincerely,

A handwritten signature in cursive script that reads "Susan M. Saul".

Susan Saul