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Comments: I have visited the Flat Country timber sale on over ten occasions over the past two years and have had the opportunity to spend a lot of time exploring the forest in the proposal. This past Saturday, (March 14th), I led a group of 25 people in unit 1300 of the sale to explore this really beautiful and dynamic area. We split off into five small groups and had a great day in the snowy forest in this region. Over the course of the day, groups were able to get to every corner of the unit and had some excellent feedback to offer. I attached a map with areas of the unit labeled for reference and am offering some site-specific feedback for unit 1300 below.

Most of the forest stands we found in the few remaining areas of this unit still slated for thinning are notably healthy, native forest filled with legacy trees, waterways and natural openings. This forest, like many stands in the Flat Country timber sale, has never been logged and instead was regenerated by fire many years ago. Anderson creek and the myriad streams bisecting this unit make it an incredibly rich place with diverse tree species and many very old legacy trees. While much of this unit is already buffered for riparian habitat, a few remaining stands that are included for thinning in the proposal should also be dropped due to habitat characteristics and lack of access.

Area "A" on the attached map is a tiny sliver of harvestable area between high flowing creeks on either side. This stand is a healthy, multi-layered old forest that is in no need of thinning. There is also a large natural meadow just to the southwest of this area that provides unique habitat for species on the edge of the riparian area. It would be an incredible shame to do any logging in this old grove when it is so near important habitat and waterways. Targeting this area looks like a timber grab.

Additionally, the area labeled as "D" on the attached map is another very nice old grove that should not be targeted simply because it does not fall precisely within the riparian buffer. This grove is full of standing water, old cedar and hemlock trees, and is also full of downed wood. While the area directly to the east of area "D" is a younger thinned plantation, area "D" is a much older, healthy grove with many legacy trees over 45', notably on the eastern edge of this unit. This area should also be dropped from harvest, as it would significantly reduce canopy cover and negatively alter the existing healthy character of this grove.

Area B is also a large swath of incredibly healthy, old forest that should not be targeted for thinning. This area looks to be excellent habitat for spotted owl, and like the rest of this unit, contains plentiful downed woody debris, standing dead snags and natural gaps in the forest canopy. This area is well on its way to becoming classic old growth, and should be left alone so that it can do so.

Area "C" on the attached map is the only grove we found in the whole unit that would make sense to thin. This stand is much younger, with typical dbh around 23" and scattered older trees around the 45" diameter. While this stand is young, it is also native and does not appear to have been logged, but instead experienced the high severity aspect of the fire that once burned through the area. This unit is in the stem exclusion phase and many of the young trees are struggling for light and could benefit from opening of the canopy. However, if logging were to happen in area "C," leaving only 40 trees per acre in this area would be a heavy cut. The Forest Service should consider leaving more trees per acre and create protections for the large diameter trees, as those are the healthiest trees in this stand.

Finally, area "B" on the map is important because it is a small patch in between two significant waterways. Importantly, our team of field surveyors found what appears to be a large seep along the southern edge of the riparian boundary for Anderson Creek in area "B," which we believe should be given its own buffer. In other words, this seep should be ground zero for the beginning of another riparian buffer that, as the map indicates, is

currently only beginning at Anderson Creek. Area "B" would also be very difficult to access except with a route through the waterways, which would be incredibly damaging to the healthy riparian habitat in this area.

If the Forest Service logs any portions of unit 1300, it should target area "C" only and ensure that the old native groves and healthy riparian areas are safeguarded from logging and from road construction.

I am concerned that leaving only 40 trees per acre in even the small areas of this unit still slated for logging is too heavy handed a prescription. Most of the stands in this unit are incredibly healthy, stable and complex groves that do not ecologically need any thinning and would likely be significantly harmed through the process.

While unit 1300 is just targeted for heavy thinning, making it one of the less egregious units in the sale, it is horrible to think about the impact that this proposal would have in some of the other older native stands that are currently slated for shelterwood harvest. Additionally, many of these older stands (especially those on the eastern half of the sale) are inaccessible due to snow cover and have been inaccessible since the EIS comment period opened, making substantive and site-specific comments on those units impossible. Moving forward, the Forest Service should ensure that important comment periods fall during times when most of the timber sale in question is accessible to those who would like to engage in the process.

As old native forests become rarer it is vital that we protect those remaining. The job of the Forest Service is to protect unique habitat, drinking water and recreation opportunities and not to sacrifice those values at the altar of timber harvest. There is a way to satisfy a variety of needs in this sale by choosing to target only young monocrop plantations with commercial harvest and avoiding harvest in older stands. Please choose Alternative 3 and do not implement regeneration harvest in the sale or target any of the old native stands with commercial logging.

Thank you for your time,  
Samantha Krop