Ashley Short

Cascade Forest Conservancy

Policy Manager

July 15, 2022

Dear Ashley,

I am writing about the proposed YellowJacket Timber Sale and road management project in the Yellowjacket Creek and Cispus River-Camp Creek watershed of the Gifford Pinchot National Forest. I have personally hiked and camped in the Covel Creek and Iron Creek areas of the Gifford Pinchot and I have some concerns about the proposal.

I am aware of the need for ATVs within the Gifford Pinchot; however, these off-road vehicles have access to over 55 trails in the Mt. Adams, Mt St Helens, and Cowlitz Valley areas listed on Forest Service website. Furthermore, the Forest Service has proposed increasing ATV access in the forest without adequately studying the impacts of adding more ATVs in this area and without planning to provide education, signage, and enforcement capacity. With the popularity of e-bikes, it is especially important that enforcement and signage are in place to ensure existing rules are followed to limit the riders’ impacts to other forms of recreation, wildlife, and sensitive habitat areas.

The outstanding recreational opportunities available in the Gifford Pinchot including hiking, fishing, camping, photography, huckleberry and mushroom picking and are all impacted by noise from the ATV users. Furthermore, many wildlife species depend upon sound to hunt and find mates; the noise from the ATVs would seriously impact their predation and nesting behaviors.

The Biden administration has just promulgated an urgent message about the importance of saving old growth trees for carbon storage. The treatments described in the Yellowjacket plans differentiate based on whether a stand regenerated naturally or was replanted following an earlier timber harvest. The Forest Service needs to take steps to protect mature trees and encourage the development of old-growth characteristics, regardless of stand history and best mitigate the impacts of climate change.

The regeneration harvest is near units where northern spotted owl have been observed nesting in the past. The recent reintroduction of fishers within the Yellowjacket stands have also been observed on wildlife cameras. The fishers are currently listed as endangered in Washington State, and the northern spotted owl is federally protected as an endangered species. The timber harvests should not occur in habitat where these endangered species exist. Ultimately, mature and old-growth forests should be protected in every unit of harvest.

The Forest Service is planning regeneration harvest in 181 acres of forests. These regeneration forests are important for ungulate populations; however, they also create potential for wildfires. No regeneration harvest should be done in units with northern spotted owl populations and extra precautions should be taken to protect the fishe rpopulation beyond what is proposed in the Environmental Assessment.

I am very grateful for the efforts by the Forest Service to decommission 33 miles of trails, as well as improvements for habitat. Unfortunately, the Forest Service is an underfunded agency which is heavily reliant upon timber harvests for their revenue.

Thank you for this opportunity to comment.

Laurie Kerr

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