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Delivered via email via the Comment Portal:
<https://cara.fs2c.usda.gov/Public//CommentInput?Project=63961>

CC: EMAILED TO: Jessica Hudec, Western Washington Ecologist, GPNF
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FROM: Loo Wit Group
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RE: Comments re: Environmental Assessment for Little White Salmon
Forest Resiliency and Fire Mitigation Project (#63961)

DATE: October 28, 2024

Thank you for the opportunity to comment on the October, 2024 draft Environmental Assessment for the Little White Salmon Forest Resiliency and Fire Risk Mitigation Project (#63961).

A comment on the original Scoping Brochure for this project was submitted on May 8, 2024 to Jessica Hudec from Jean Avery, a member of the Sierra Club's Loo Wit Group and a member of the National Forest Committee of the Washington State Chapter of the Sierra Club.

A comment on the Scoping Period Extension for two Forest Plan amendments was sent on July 24, 2024 to Whitney Reynier.

Background of the Washington Chapter of the Sierra Club

Members of the Washington Chapter of the Sierra Club have had a long history of working to protect federal lands within the Gifford Pinchot National Forest (GPNF):

- Our involvement dates as far back as the Unit Plans and the Roadless Area Review and Evaluation (RARE) I and II studies during the 1970's.
- We worked to add Wilderness Units in GPNF as part of the Washington Wilderness Act of 1984.
- We commented on the Gifford Pinchot Land and Resource Management Plan (LRMP) Draft Environmental Impact Statement (EIS) and Final EIS of 1990.
- More recently, we participated in the development of the Northwest Forest Plan (NWFP) of 1994 and its subsequent implementation, including several timber sales prepared pursuant to the NWFP's direction to GPNF.
- More recently, on July 20, 2020 the WA Chapter of the Sierra Club submitted scoping comments on the Forest Wide Thinning & Potential Control Line Treatments in Gifford Pinchot National Forest (#65884).

Restatement of Our Concerns with Project-Specific Amendments included in the Environmental Assessment

1. As we wrote in our July 24, 2024 letter to Whitney Reynier, we are concerned that project-specific amendments to the Forest Plan are relied upon for this project. (EA-pp. 16 and 35-36) To reiterate our position, we believe such short-term amendments are "ill-advised" and "set a bad precedent" by modifying standards and guidelines for just one project.
2. For example, the Scenery Report states that portions of the proposed action are "*unlikely to meet the Forest Plan standards and guidelines for the Retention VQO in the short-term.*" It's not clear that the Forest Service has a convincing argument for such a project-specific amendment (S-16, EA-p. 74).
3. The EA's evaluation of fuel breaks appears to be limited to visual impacts. However, fuel breaks, especially those constructed during emergency wildfires, also have adverse environmental impacts on fish, wildlife, and water quality. Taken together with additional work related to potential control lines, these can have cumulative adverse impacts that

should be addressed in a draft Environmental Impact Statement that includes such an analysis, identification of all past fire breaks constructed, as well as all planned future fire breaks and alternatives.¹

Our Current Concerns with this Environmental Assessment

We are in receipt of the draft Environmental Assessment (EA) for the Little White Salmon Forest Resiliency and Fire Mitigation Project (#63961). This 92-page EA seems well organized and very well documented—with five pages of references, seven appendices, eight specialist reports, and numerous charts and maps. We appreciate that this EA has been modified in response to various scoping comment letters.

It seems the Forest Service is asking stakeholders for input on (at least) three questions:

- I. Is there a need for an Environmental Impact Statement (EIS)?²
- II. Of the alternatives presented, which one(s) would best address the public's concerns?
- III. Would there be significant impacts that need to be addressed before proceeding?

As part of our response, we include aspects of the EA in which the Forest Service (FS) must conform with existing management directions. We expect that the Forest Service will follow the clear requirements of both the Northwest Forest Plan (NWFP) and the Gifford Pinchot Land Resource Management Plan, Amendment #11, 1995 (the Forest Plan).

I. Is there a need for an Environmental Impact Statement (EIS)?

We believe that an Environmental Impact Statement (EIS) should be required, based on the extensive and important issues raised by the EA. Our concerns are summarized in the following pages and in the table below:

¹ “[P]ast, present, and future efforts to reduce the severity and risk of catastrophic wildfire would have a cumulative immediate and lasting direct visual impact through the creation of burn scars and linear fuel breaks on the landscape. However, in the long-term, these actions help prevent the even more damaging and long-lasting impacts of wildfire on the scenic quality of the landscape.” (EA-p. 74)

² “The purpose of this environmental assessment is to determine whether effects of the proposed activities may be significant enough to prepare an environmental impact statement.” (EA-p. 1)

Our Concerns	See
project-specific amendments included in the EA	Page 2
logging of old-growth forests, stands, and trees	III.A
impacts to Northern Spotted Owls and their habitat	III.B
minimizing logging by using terms, “thinning” and “landings”	III.C
Potential Control Lines (PCLs)	III.D
prioritizing timber production over other uses of our National Forest	III.E
no references to herbicides	III.F
impacts on fish in nearby fisheries and the Columbia River	III.G
protection of the Columbia River Gorge National Scenic Area	III.H
impacts to the Columbia River	III.I
impacts to neighboring towns in this area	III.J
impacts to heavily traveled and necessary roads	III.K
need to conform with the NWFP and GP Land Resource Mgmt. Plan	IV
IRAs are not formally recognized within the planning area	V

II. Which alternative would be preferred: No Action, Young Plantation Thinning Only, Limiting Mature Forest Management?

1. Our forests need protection – especially now and into the future. The Forest Service (FS) clearly considers the many interdisciplinary aspects of this project, as well as the need to protect our forests in a changing climate. However, the FS may be excessively relying on the potential effects of removals (logging) to meet long-term objectives, especially in mature stands.
2. As noted in the EA, the “*public’s concern*”³ – and ours as well – is logging in mature forest old-growth stands. Therefore, “Limiting Mature Forest Management” would be a high priority. Our question is, could “Limiting Mature Forest Management” be combined with “Young Plantation Thinning Only” for this project instead of the proposed action?

³ “*The interdisciplinary team shares the public’s concern about mitigating environmental impacts in mature forest stands.*” (EA-p. 37)

3. On page 36 of the EA, the FS mentions several alternatives considered for this project. However, the EA states that these alternatives have been considered but eliminated. So, we will respond below to the full action alternative.

III. Would there be significant impacts before proceeding?

Our response includes the following concerns:

III.A. We are concerned about logging of old-growth forests, stands, and trees.

1. The proposed action includes *“thinning of conifers on 1,759 acres of mature forest (> 80 years old). Of these, 96 acres are in LSR.”* (EA-p. 23). However, the EA states on page 28 that 253 acres of LSR stands over 80 years old will be thinned to mitigate fire risk. There also is some confusion in Table 3 (EA, -p. 23) regarding the acreage of mature forest thinning planned for LSRs. Please clarify which figures for LSR thinning in stands over 80 years old is correct and how many of these acres are planned for Riparian No-Cut buffers.
2. The EA states that *“a majority of the stands in the project area are in the matrix”* (EA-p. 18). However, *“no reliable... methodology exists to map mature and old growth forests at fine spatial scales.”* (EA- p.10). How, then, will appropriate identification of and protection for old-growth and mature stands and trees be provided? Appendix F does go into extensive detail as to how the FS did identify both Mature Forests and Old Growth Forests for this project. If the FS supports the conclusions documented in Appendix F, please revise the EA to conform with Appendix F and eliminate the EA comment that *“no reliable methodology exists...”* for that purpose.
3. Page 29 of the EA states the following (*Note: formatting is changed for emphasis, and FN 12 is not included*):
 - a. *“Understory Fuel Management in Mature and Old-growth Forest: Fuel management focused on material <9” DBH is also proposed across 332 acres in select mature forest and **forest with old-growth characteristics** that are otherwise not receiving treatments as described above.*
 - b. *“Forest stands with old-growth characteristics selected for understory fuel management are along priority PCLs and are important for increasing safety and effectiveness of potential fire management operations, improving safety of ingress and egress along key travel routes, and creating contiguous fuel treatment blocks with minimal disturbance to resources.*

- c. *“Mature stands selected for understory fuel management are not limited to locations along PCLs but occur in landscape locations where treating the understory would support fire risk mitigation objectives while protecting other resource values.”*
4. Continuing on page 29, the EA states, *“In stands with old-growth characteristics, treatment would be limited to within 500 feet of the road and/or PCL, where applicable, except for underburning, which could be applied to the whole stand if on-the-ground conditions are suitable without pre-treatment.”*
5. We object to any cutting, whether commercial or non-commercial, in old-growth forest or stands with old-growth characteristics – even if for understory fuel management. It is well known that old-growth trees and stands are quite fire resistant, and there is no need to cut them. We explicitly object to cutting in old-growth characteristic stands within 500 feet of the roads and/or PCLs.
6. Appendix F on page 1 states that *“no commercial harvest will occur in **old growth forest.**”* However, the FS also states on page 1 of Appendix F, *“Non-commercial fuel reduction activities may be considered to meet fire mitigation objectives along PCLs and around Willard.”* *“Non-commercial fuel reduction activities using hand-held equipment may be considered on a case-by-case basis to meet fire risk mitigation objectives along PCLs and around the community of Willard.”*
 - a. It is unclear whether or not the activity described above is to occur in old growth forest, as both page 22 of the EA, and Appendix F, page 1, do not indicate what type of stands or LUAs will have hand-held, non-commercial fuel reduction treatment. Please revise the EA to clarify.
7. The FS states on page 1 of Appendix F the following regarding commercial harvest in Mature Forests *(as described pages 1 and 2 of Appendix F, emphasis added)*: *“Commercial harvest will be considered in **mature forest** where forest health and resilience or fire risk mitigation is the main driver.”* *“Commercial harvest in **mature forest** will not be considered for economic purposes only.”*
8. Another concern is how this proposed project will overlap and be governed by the pending Amendment to the NWFP, and the pending National Old Growth Amendment. Those documents may well provide important direction to this project, and should be considered in finalizing the project and its documentation in this EA. [**See Section IV.**]
9. The EA should be revised to provide an assessment as to which portions of the *entire* Gifford Pinchot Forest are considered moist and which portions are dry forests.
 - a. In particular, the EA should provide an assessment as to which portions of the planning area are considered moist and which are considered dry forests.

- b. This assessment should be based on technical analyses backed by scientific data.
- 10. Even though the planning area is generally located immediately east of the Cascade Crest National Scenic Trail, this does not necessarily result in dry forest conditions. The Little White Salmon Planning Area Landscape Evaluation Summary (WA DNR 2023, see EA-p. 9) may not be applicable to the specific forest conditions in the planning area.
- 11. We request that the EA be revised to provide a clear definition for all acres to be cut for any *regeneration harvest* by LUA.
- 12. We also request a clear, concise definition of all acres to be cut for any reason in LSRs, with an emphasis on any cutting in stands over 80 years old. The data in EA Table 3 suggests that cutting in LSR stands over 80 years old could be as great as 672 (96+253+323) acres.
 - a. Cutting in “Mature and old growth understory” for fuel management must be designated by LUAs and further designated by stand age for LSRs.
 - b. The maps in Figures 5, 7, and 8 should more clearly show the cutting units where “mature and old growth stands” will be entered for any reason.

III.B. We are concerned about impacts to Northern Spotted Owls and their habitat.

- 1. According to the Wildlife Report, “the proposed action is *likely to adversely affect* northern spotted owls and is *likely to adversely affect* designated northern spotted owl critical habitat.” (W-37, with italics in the original text, as well as page 69 in the EA).
 - a. Under the Endangered Species Act, such designations should be accorded significant deference, particularly given the status of the Northern Spotted Owl. See references below.
- 2. Washington Dept of Fish and Wildlife has listed the Northern Spotted Owl (NSO) as **Endangered**. See https://wdfw.wa.gov/species-habitats/at-risk/listed?species=northern+spotted+owl&state_status=All&federal_status=All&category=All
- 3. The US Fish and Wildlife Services has acknowledged that the Northern Spotted Owl **qualifies to be listed as Endangered**, but that the USFWS has not yet taken steps to formalize the listing as Endangered.

4. The NSO needs even more protection now than in 1994, per the USFW's statements, in the 2021 update to the 2012 Critical Habitat Rule. For documentation that the NSO is qualified for Endangered Species status, see page 96 of the 2021 Rule:
–<https://www.federalregister.gov/documents/2021/11/10/2021-24365/endangered-and-threatened-wildlife-and-plants-revised-designation-of-critical-habitat-for-the>
 - a. The FS has failed to amend LRMPs in the region of the NWFP to require the protections of Critical Habitat in Matrix as set forth in the 2012 Critical Habitat Rule, as amended in 2021. See page 95 of the 2021 Rule: “...the USFS has not yet revised its forest plans and applied the recommendations of the 2011 Revised Recovery Plan nor expressly taken into consideration the 2012 critical habitat designation into these plans”
 - b. Also see page 96 of the 2021 Critical Habitat Rule: “Additionally, recent scientific findings and our December 15, 2020, finding (and supporting species report) that the northern spotted owl warrants reclassification to endangered status **emphasize the importance of maintaining habitat** in light of competition with barred owls.” [emphasis added]
5. Based on the foregoing, the FS must recognize that the Northern Spotted Owl is qualified for listing as an Endangered Species – on both a Federal level and a State level. Accordingly, the FS should revise this project to more adequately protect the Northern Spotted Owl and its critical habitat.

III.C. We are concerned that the EA minimizes logging by using terms “thinning” and “landings.”

1. Page 23 of the EA devotes an entire section to “Thinning” and states that the “commercial thinning prescription and logging methods are listed in Appendix B.”
2. Another reference to “thinning” is on page 13 of the EA: “Vegetation management through thinning, artificial regeneration, and prescribed fire can promote the desired heterogeneity in structure and species composition, reduce competition for resources, reduce the likelihood of uncharacteristic fire effects, and, consequently, improve forest health and resiliency.” (EA-p. 13)
3. Appendix B never mentions “logging.” Rather, it refers to “landings.” Please amend Appendix B to specify “logging.”

III.D. We are concerned about the references in the EA to Potential Control Lines (PCLs).

1. The EA does not specify how much area could be impacted by PCLs. Of the 18 references to PCLs in the EA, none mention their proposed dimensions or acreage.
2. More important, under 40 CFR 1501.11, amended July 2024, the EA cannot 'tier' to an unapproved NEPA document, such as the pending EA for *the Forest Wide Thinning & Potential Control Line Treatments in Gifford Pinchot National Forest*, #65884. The scoping for this pending – not yet drafted – EA provides a forest-wide proposal for PCLs. The only time there can be references to and reliance on another EA, is when that other EA has been finalized. See references below:
 - a. 40 CFR 1501.11 (b) Tiering. *“Where an **existing** environmental impact statement, environmental assessment, or programmatic environmental document is relevant to a **later** proposed action, agencies may employ tiering.”*
 - b. See also page 21 *League of Wilderness Defenders v. Connaughton*, No. 3:12-cv-02271-HZ (D. Or. Dec. 9, 2014): *“However, the Forest Service cannot tier its analysis to a forthcoming, uncompleted NEPA document.”*
 - c. There is no approved EA for the forest-wide project #65884, and thus there should not be any discussion of or reliance on unapproved project #65884 in the EA for this project (#63961).
3. There should be no discussion of the PCLs or PODs which are proposed in the Scoping for #65884, and the EA should accordingly be revised. However, should the FS disagree with our comment about inappropriate tiering, then until such time as we mutually resolve the issue, please revise this EA to provide specific information in terms of dimensions and acreage for the proposed PCLs.
 - a. See also page 24 of the Fuels Analysis Report for discussion of the pending 2024 EA analysis forest-wide: *“If the Forest Wide Thinning & Potential Control Line Treatments Environmental Analysis is completed and signed, **then commercial harvest would become another tool for treating plantations in the project area as described above.** However, as described above, there is an expected limit to the acres this authority would allow for treatment **in any single year and its use would be subject to Forest wide prioritization processes.**”* [emphasis added]

- b. Given the possibility of additional commercial harvest if the forest-wide Project is approved, this issue should be addressed in an Environmental Impact Statement. Additional commercial harvest would have a significant impact on this watershed and its view corridors, as well as wildlife habitat and/or the Aquatic Conservation Strategy (ACS) objectives. The analysis in the above paragraph clearly would need to be addressed for this project, and would clearly merit an Environmental Impact Statement.

III.E. We are concerned that the EA prioritizes optimizing timber production over other multiple uses of our National Forest.

1. It is expected that this forest will be managed for a range of resource values, not simply timber removals.
 - a. *"Timber productivity would be sustained over time through attention to sustainable tree densities and shifts in genetics and/or species best adapted to certain sites." (EA-p. 15)*
 - b. *"The goal of general forest is to optimize timber production, the utilization of wood fiber, and other commodities in a manner which assures the future productivity of the land." (EA-p. 21, under the heading, "General Forest and General Late-Successional.")*
2. The draft EA should provide a reference to 16 U.S.C. 528, which sets out the policy of Congress that *"the national forests are established and shall be administered for outdoor recreation, range, timber, watershed, and wildlife and fish purposes."* Wildlife and fish are not "commodities," but fundamental components of a functioning forest (not vegetation) ecosystem.

III.F. We are concerned that the EA fails to make even a single reference to herbicides.

1. It is of concern that the EA fails to make even a single reference to herbicides, or any estimate of the type or quantity of herbicides that the Forest Service intends to use over the lifetime of this project.
2. Effects of weed treatment are covered under the Forest's Invasive Plant EIS (USDA FS 2008).

3. Appendix D to the EA includes a variety of project design criteria and mitigation measures that are proposed to prevent the introduction and spread of invasive weeds: Invasive weeds would be treated where they occur along roads and within treated stands, before and after logging, as funding allows. Invasive treatments would be prioritized adjacent to stands with old-growth characteristics, mature stands, in areas with high management activity concentration (i.e., multiple stands, multiple planned activities), and based on Washington State invasive weed classifications.
4. In order to provide a proper assessment of the probable significant adverse impacts from the proposed project, the Forest Service needs to include an analysis of weed treatment, as well as alternatives to herbicide use. Such an analysis appears to be required to ensure consistency with the objectives of the Aquatic Conservation Strategy of the NWFP.

III.G. We are concerned about the possible impacts on fish in nearby fisheries and the Columbia River.

1. The Fisheries Report indicates *“no impact to Forest Service Sensitive fish species”* (F-10) — referring to creeks, tributaries, and the watershed. However, nowhere does the EA address impacts on fish and water in the Columbia River, Little White Salmon Fish Hatchery, or Spring Creek National Fish Hatchery.

III.H. We are concerned about protection of the Columbia River Gorge National Scenic Area.

1. The southern part of the project’s watershed is within the Columbia River Gorge National Scenic Area (CRGNSA). (EA-p. 1) The Gorge’s fragile beauty and recreational opportunities are governed by stringent requirements for construction, activities, and even numbers of hikers permitted on trails.
2. There is no mention of conferring with the Gorge Commission or complying with its regulations.
3. Please revise the EA Planning Guidance section (pages 15-22) to explicitly document the management direction of the CRGNSA. The EA should also describe how this project is compatible with the management of the National Scenic Area.
4. The EA should be revised to recognize the location of the CRGNSA within the planning area. Please revise the EA maps in Figure 5 (page 17) and Figure 6 (page 20) to show the boundaries of the CRGNSA.

III.I. We are concerned about impacts to the Columbia River.

1. The map on page EA-12 (and others) shows that the project's watershed extends southward and along the banks of the Columbia River. Indeed, the Little White Salmon River flows into the Columbia River. The EA should assess what impact this project's activities would have on water quality for the Columbia River and nearby communities. What impact would this action have on salmon and other fish?

III.J. We are concerned about impacts to neighboring towns in this area.

1. Several towns in the Columbia River Gorge are within the project area, including Willard, White Salmon, Bingen, North Bonneville, Carson, and Stevenson. What potential impacts would there be for residents of nearby towns, on their water supply, water quality, and their surroundings?
2. There is reference to "*fire risk mitigation*" near Willard (EA-pp. 22, 28 and F-1), as well as to the "*at risk*" community of Stevenson (EA-p. 39). The EA should be revised to describe the fire risk in specific terms and how this project will mitigate that risk.

III.K. We are concerned that the project may impact roads that are heavily traveled and necessary for cars, trucks, residents, and recreational users.

1. The Transportation Report identifies "*approximately 220 miles of roads in the watershed*" that would be included in the proposed action. (T-10)
2. The Transportation Report briefly notes Highway 14, Skamania County roads, and Forest Service roads that are popular for recreation. (T-2). However, there is no mention of the impacts of this project on the local area, even though the document acknowledges its proximity to the Columbia River Gorge, Mt. Hood National Forest, and the Portland-Vancouver Metro area.

IV. Aspects of the EA in which the Forest Service must conform with existing management direction regarding the Northwest Forest Plan.

As mentioned in section IIIA.8, a major concern is how this proposed project will overlap and be governed by the pending Amendment to the NWFP, and the pending National Old Growth Amendment. Those documents may well provide important direction to this project, and should be considered in finalizing the project and its documentation in this EA.

IV.A. We are concerned that Riparian Reserves and buffers are not correctly defined in the Environmental Assessment.

1. The table on page 26 of the EA states that buffers can be on “*either side*” of the water course. The word ‘either’ means ‘one or the other’ but not *both*. However, the NWFP explicitly directs that Riparian Reserves shall be located on both sides of the water course. Since the Stream Protection Buffers are included within the Riparian Reserves, the rule of protection on ‘both sides’ should apply to the Stream Protection Buffers. ‘Each side’ is the wording used in both the NWFP Standards & Guidelines at pages C-30 and C-31, and in the NWFP Record of Decision 1994 at page 9. In addition, the LRMP, Amendment #11, provides ‘each side’ at page 2-4 and page 2-6, although at page 1-12 the Amendment #11 does use the words ‘either side’. Page 1-12 is in error.
2. We ask that the EA be corrected to reflect that the Stream Protection Buffers shall be located on *both* sides of the stream.
3. We note that in the *Final Biological Assessment Timber and Resource Activities on the Western WA (MBS, GP and Oly) Collaboration and Restoration Zone -2024* (referred to as the (“WWCRZBA”), there is specific protection for **municipal water sources** in Class 1 Streams. See the table below, copied from page 210 of the WWCRZBA:

Table 61. Stream protection buffer (no-harvest buffer) widths by stream class.

Stream Class	Riparian Reserve (feet)	Stream Protection Buffer (feet)	Definition
Class 1	300	150	A waterbody containing ESA-listed fish, or <u>municipal water source</u>
Class 2	300	100’ within 1,000’ of a LFH stream, 75’ outside of 1,000’ from a LFH stream	Non-ESA listed fish-bearing streams
Class 3	150	60	Non-fish bearing streams - perennial*
Class 4	150	50	Non-fish bearing streams - intermittent

* if not field verified, or there is no information on file, perennial streams are presumed to be fish-bearing.

- a. Although the EA on page 56 does refer to protection for the municipal water supply of Willard, clearly there are other communities south of Willard which may well obtain their municipal water from the Little White Salmon Watershed. We ask that the FS evaluate those other communities, even though they are outside of the project boundaries, which obtain some of their municipal water from the Little White Salmon Watershed and provide the necessary buffer protection in the project for those communities.
- b. We ask that the EA (including but not limited to pages 26, 29, 34, 37, 56, 57, and 59) and pages 3-5 of Appendix D) be corrected to include reference to Municipal Water Source requirements, including but not limited to the two Custom Buffers listed at the bottom of page 26, and including but not limited to:

- the Table on page 26 and the two Custom Buffers on page 26, and
- the categories listed on page 29 of fuel management within Riparian Reserves, to reflect the correct buffer widths rather than the 20-foot widths shown on page 29, and
- the last line on page 37, protection of mature trees and biological hotspots in no-cut riparian buffers, and
- the first paragraph under *Water Temperature* on page 56, and
- the third paragraph under *Other Fish Species* on page 59.

IV.B. We are concerned that the Watershed Assessment of 1997 is out of date, and request that it be updated.

1. See page 56 of the NWFP ROD, and pages A-7, E-20 and E-21 of the NWFP Standards & Guidelines (S&Gs), which state that ‘watershed analysis is an ongoing, iterative process.”
2. As the Little White Salmon is a Tier 2 Key Watershed under the NWFP, its water is important not only for surrounding communities but also for fish. There should be no proposals for work in the watershed unless and until the 1997 Watershed Assessment is updated.

IV.C. We are concerned about the proposed cutting of trees older than 80 years of age in LSRs.

1. The NWFP ROD S&G page C-12 prohibits the cutting of trees explicitly West of the Cascades “*There is no harvest in LSR stands over 80 years old.*” Note that all project area mapped LSR LUA acres are either on the Cascade Crest or a short distance east of the Crest.
 - a. Since nearly all of the LSR LUA acres within the planning area are located on or near the Cascade Crest, it is expected that this direction will be applied to all the LSR acres in the planning area. For those LSR acres located East of the Cascade Crest and north of Willard (about 10 units per the Figure 5 map) the EA shows no cutting will occur.
 - b. However, the 350 LSR acres in stands over 80 years old where cutting is planned are all southwest of Willard [the SW Parcel]. We object to this cutting of the SW Parcel (as described on page 18), because it violates the NWFP direction. Please re-assess this EA direction.

2. Given that the NWFP Standards & Guidelines (page C-12) prohibits cutting trees or stands over 80 years of age in LSR on the West Side, and given that the FS wishes to cut trees over 80 years of age in the LSR known as the SW Parcel, the FS must limit such cutting of trees over 80 years of age to those trees which meet the following requirements:
 - trees that are 20" - 26" DBH at the time of cutting, and/or
 - trees that are less than 120 years of age at time of cutting.

Any request to the REO for approval of a waiver of the prohibition on cutting trees over 80 years of age must include the above two restrictions

V. We are concerned that inventoried roadless areas (IRAs) are not formally recognized within the planning area.

1. Please revise the maps (Figure 5 on page 17 and Figure 6 on page 20) that show the locations of all IRAs within the planning area.
2. Please revise the EA Planning Guidance section (pages 15-22) to explicitly document the management direction for IRAs per the Roadless Area Conservation Rule of 2001.
3. Any thinning treatments in Inventoried Roadless Areas must follow the strict limitations listed in the Roadless Area Conservation Rule 2001, Section 294.13 (b)(1) (i). We expect no entries will be made into any IRA within the planning area.

In summary, we believe the above concerns warrant the preparation of a draft Environmental Impact Statement.

We respectfully request that the Forest Service submit a draft Environmental Impact Statement before proceeding with this project.

Thank you for considering our comments and for working collaboratively with partners: Washington Department of Natural Resources, US Fish and Wildlife Service, South Gifford Pinchot Collaborative, Cascade Forest Conservancy, and the Yakama and Cowlitz Nations.

Respectfully submitted,

Mark Leed, Chair

Loo Wit Group of the Washington State Chapter of the Sierra Club

Please reply to: hbromb@aol.com - *Harry Romberg*, Co-Chair
National Forest Committee of the Washington State Chapter of the Sierra Club