



October 28, 2024

Acting District Ranger, Mt Adams Ranger District
Gifford Pinchot National Forest
2455 Hwy 141
Trout Lake, WA 98650

Re: Little White Salmon Forest Resiliency and Fire Risk Mitigation Project Draft Environmental Assessment (Draft EA)

Thank you for the opportunity for submitting comments on the Draft EA. We recognize the substantial amount of work that went into this analysis and applaud the Mt Adams Ranger District for taking the bold step in proposing the treatment of over 11,000 acres of stands within the planning area. We are also pleased to see that many of the stands proposed for treatment are in the east/northeastern portion of the planning area, an area almost directly west of our community of Trout Lake. Reducing the crown density in these stands can help to reduce wildfire risk to our small community. One of the greatest concerns we have is the risk of a wildfire from the west, driven by strong winds associated with a cold front. That being said, we are somewhat mystified that the Draft EA makes no mention of Trout Lake as one of the communities at risk. We encourage the district to look outside of planning area boundaries when considering communities at risk.

The Trout Lake Community Council (TLCC) met via video conference on Thursday, October 24th. Jessica Hudec, Western Washington Ecologist, from your office took time that evening to answer questions that council members had and we thank her for the time spent with us. Please accept the following comments regarding the Draft EA.

- We are supportive of the proposed stand treatments in the Environmental Assessment and feel that reducing crown density is a first step in wildfire risk mitigation. Additional hazardous fuels treatments are also beneficial to reducing wildfire risk.
- We support the goal of increasing diversity of stands through the planting of other species such as ponderosa pine, western white pine and western larch in the appropriate sites.
- Generally, we are supportive of the management of the road system within the planning area. The creation of new temporary roads to achieve access for management treatments is appropriate if they are placed in locations that are not adversely affecting hydrologic resources and are not located in areas of unstable soils. For those roads needed for long-term access for management activities, we are supportive of placing them in a “storage” condition that stabilizes hydrologic condition and closes them to motorized access. This serves to minimize long-term environmental impacts while also reducing costs associated with this project and future management actions.

- We are very concerned about the undisclosed effects from the proposed decommissioning of Forest Road (FR) 6615. There is insufficient information provided regarding the degree of recreational use on this road. Traffic counts should be utilized to determine the degree to which this road is used by the public prior to moving forward with decommissioning. Failure to determine the level of present use results in the failure to disclose, or at least be aware of, the potential impacts to other areas of the forest from displaced recreational use once the road is decommissioned. Anecdotally, we are aware of the popularity of the area accessed by FR 6615 and know that there are a number of dispersed camping sites which have been used for a very long time. TLCC members are supportive of improving hydrologic condition on the forest as we feel it is essential in light of climate change. However, in a review of the hydrology analysis we contend there is insufficient data provided as to the hydrologic benefits provided by decommissioning the road. For instance, o
- n page 19 of the analysis it states *“This includes 1.3 miles within riparian corridors along the Upper Little White Salmon floodplain and 2.0 miles along Lost Creek. This will result in a net decrease of road miles in proximity to water in the post-treatment condition in all subwatersheds, thereby reducing the risk of sediment delivery to streams in the long term, but not enough to improve the condition score.”* FR 6615 also serves as an alternate route from Trout Lake to the Goose Lake area in the event of an emergency (medical or otherwise) and the primary road, FR6000, being closed or obstructed in some manner. In light of these unknown, and known, effects, we recommend the Forest Service consider other options to improve hydrologic condition while keeping the road open for public use or, at the minimum, more clearly disclose the true effects of decommissioning the road. We are aware that providing dispersed recreation use and access is not a mandate. However, it is a reality that more people are visiting and recreating on the Gifford Pinchot National Forest. Eliminating access to existing popular areas will only serve to displace the use to other, and perhaps more sensitive, areas on the forest.
- The Project Design Criteria (PDC) associated with non-native invasive plant species are also of concern. More specifically, on page 24 of the PDC document, it specifies pre-implementation treatments “as funding and capacity” allow. We are concerned that management activities associated with this project will result in the spread of non-native invasives into forested areas, thereby compromising ecological integrity. Therefore, we encourage the pre-treatment of infestations prior to ground disturbing activities

Thank you, once again, for the opportunity to provide comment.

Respectfully,

/s/ Daina L Bambe

DAINA L. BAMBE
Chair, Trout Lake Community Council

Cc: Jessica Hudec – via email