

To: Erin Black (MARD Permanent District Ranger)
2455 Hwy 141
Trout Lake, WA 98650
United States
Re: LWS Draft EA Comments
From: The South Gifford Pinchot Collaborative
Date: 10-31-24



Ranger Black / LWS planning team:

Congratulations to your team on wrapping-up the planning stages of this important project! As such, please accept this letter as formal comments on behalf of the **South Gifford Pinchot Collaborative** (SGPC) pertaining to the **Little White Salmon (LWS) Forest Resiliency and Fire Risk Mitigation Project Draft Environmental Analysis** (hereby abbreviated as 'the EA'). We have thoroughly reviewed the EA and propose the recommendations herein around which we have found broad agreement within our group (with the exception of one member with considerably differing opinions). We have also highlighted outstanding questions related to the project, as well as any broader areas of disagreement that remain within our group.

The SGPC appreciates the efforts put forth by the United States Forest Service (USFS) to **engage the public** throughout the entirety of the planning process. We especially thank the Gifford Pinchot National Forest (GPNF) Interdisciplinary (ITD) team and your Mt. Adams Ranger District staff for their efforts and willingness to engage with the SGPC, and for their assistance with facilitating field trips on the watershed to discuss resource management issues and proposed actions. As a result, we recognize the inherent challenges/**tradeoffs** associated with watershed-scale planning.

The following sections outline where the SGPC was able to find **meaningful agreement** over the LWS project/EA. See the **attached SGPC LWS Synthesis Document** for broader suggestions associated with this project; this information was captured over the past ~3 years of discussions at Zones of Agreement (ZOA) and full-group collaborative meetings. We also offer the below list of comments and recommendations specific to the EA.

We feel the **EA is well-written** and clearly communicates the **potential positive and negative impacts** of implementing the project. The **Existing Condition** section clearly describes the unique biogeographical, climatic, and anthropogenic characteristics of the LWS' transitional watershed. The distinctions made between **vegetation zones** and **land-use allocations** are helpful, as are the overviews of fire history/ecology, forest health/resiliency, vegetation departure/treatment needed, special habitats, mature and old-growth forest, wildfire risk, riparian areas/in-stream aquatic habitat, and road-related resource issues. In general, the corresponding **Desired Conditions** are logical and commensurate with the existing conditions on the watershed.

We **generally support the four objectives** outlined in the **Project Purpose and Need** section and appreciate the **collaborative approach** taken for this planning area—including the use of **analysis/science tools** (e.g., landscape evaluation, fire modeling) provided by the Washington Department of Natural Resources Forest Resilience Division (**WA DNR**). We also appreciate USFS and WA DNR logistical support for **monitoring** efforts on the watershed being undertaken by the Cascade Forest Conservancy (long-time SGPC members).

We recognize that **active management** is needed to address the resource considerations outlined in the EA, such as past management activities, wildfire risk, threats to riparian areas, threats to roads, commitments to tribes, and economics. Consequently, we **generally support the Proposed Action to treat 13,249 acres to increase forest resiliency to climate-related stressors and mitigate wildfire risk to high value resources**.

Collaborative feedback pertaining to individual sections of the EA:

Forest resiliency activities

- We appreciate that the management approaches outlined in Table 3 are **tailored** to different parts of the watershed and their associated resource conditions and concerns.
- We support the **thinning from below of conifers on 5,092 acres** proposed largely in matrix stands under 80 years old for forest resiliency purposes.
- We support the **creation of 425 acres of early-seral habitat (ESH)** in young forest plantations to support early seral forest dependent wildlife species, increase landscape heterogeneity, and reduce the likelihood of crown fire transmission to adjacent older forest. Please see the attached LWS Synthesis Document for recommendations pertaining to ESH creation (based on the **attached SGPC ZOA: ESH Creation**).
- We appreciate that **regeneration harvests** are reserved for **ESH creation**, to address **root rot**, and/or for **experimenting with planting different species based on projected climatic shifts**.
- We support the proposed **skips and gaps**.
- We support the proposed **no-cut riparian buffers**, given these are designated by existing legal statutes (e.g., Clean Water Act, Northwest Forest Plan Aquatic Conservation Strategy) and beyond the purview of collaborative influence.

Fire risk mitigation activities

- We generally support the **proposed fire risk mitigation activities**—particularly those that will improve **safe ingress/egress** and **protect the towns of Willard and Mill A**.
- We strongly support the **improvement of existing potential control lines (PCLs) and opportunities to create new PCLs** to protect communities and valued resources.
- We generally support the proposed **thinning from below of conifers on 1,133 acres of young forest plantations** for fire risk mitigation, as well as the associated post-harvest fuels treatments and maintenance.
- We support the proposed **understory fuels management in mature stands**, as well as other treatments in these stands when **multiple objectives** can be met (e.g., improve PCLs, treat disease) and where fire risk mitigation objectives clearly necessitate active management.
- We support **winter logging** activities when conditions are favorable.
- When available, we support the **use of existing road infrastructure** versus building new temporary roads. See the attached LWS Synthesis Document (based on the **attached SGPC ZOA: Plantation Thinning**) for additional recommendations related to roads.
- We prefer the use of **road closures over full decommissioning** for roads that may be useful as future PCLs or points of ingress/egress for the towns of Willard and Mill A.
- We support efforts to **maintain and improve existing roads**—especially opportunities to improve **aquatic passages** (e.g., culverts) and/or for **public wellbeing** (e.g., access, drinking water, PCLs).
- We recognize the importance of **recreation access** to different parts of the watershed (e.g., trails, dispersed camping sites, throughfares for motorcyclists). However, we also support the proposed **aquatic restoration efforts** observed during the 7/18/24 SGPC field trip. For example, we suggest the **use of Good Neighbor Authority** contracting for the **Cabbage Creek Crossing** given the greater contracting flexibility. Again, we generally prefer the use of road closures over decommissioning when possible to maintain access points in these areas into the future.

Environmental impacts

- We appreciate USFS efforts to document projected **climate change impacts** (i.e., positive/negative) on greenhouse gases, carbon storage, and environmental justice.

- We also appreciate the descriptions of **potential impacts** on vegetation and silviculture, fire and fuels, soils, hydrology, fisheries, wildlife species, botanical species, scenery, recreation, and cultural resources.
- Although one member noted a lack of attention to impacts to **wildlife other than NSOs** within the body of the EA, **Table 10** was particularly useful and we recognize the need to address recurring comments/themes received during Scoping within the EA page limit.
- We appreciate the extensive **tables and figures** displayed to elucidate **threatened resources, impacts on future fire risks**, and other relevant data.
- We appreciate the descriptions of **cumulative effects** for each major resource.

Although we have reached meaningful agreement on the above points, the SGPC has **outstanding disagreement** around the below points. See the attached LWS Synthesis Document for areas of disagreement captured before the Draft EA was released.

- We could not find agreement around the **dropping of 2,351 acres of mature stands** from the project resulting from Executive Order 14072 and the National Old Growth Amendment process. Some members also expressed concern about management implications of the associated **interim policy**. As such, we will be discussing this as a group in future meetings to develop local collaborative guidelines for the USFS.
- We could not find agreement on the **amounts of mature forests that should be treated**. At least one member believes some mature stands, particularly the complex mature stands, should not be treated while others believe more mature stands should have been proposed for treatment.
- We could not find agreement around the use of **hardline metrics** (e.g., age, diameter at breast height) versus **conditions-based assessments** (i.e., structure and function) for determining the acceptability of management actions. For example, several members *do not* support the proposed **20-inch DBH limit** for LSR, while at least one member *does* support the limitation.
- We could not find agreement around the extent to which **individual species** (or its habitat) **should be prioritized** above others (e.g., NSO). For example, we have not found agreement around the size and methods associated with determining **NSO circles** nor the acceptability of **lethal barred owl management**.
- We could not find agreement around the relative efficacy of the different proposed **residual canopy covers** (i.e., 40%, 50%, 60%) and their associated future implications for fire behavior.
- We could not find agreement around the relative merit of **helicopter logging** practices given the cost and potential impacts.

Other **notes/suggestions** and **questions (Q)** for clarification:

- We request '**ground-truthing**' in the **2,351 mature acres** dropped near the towns of Willard/ Mill A, along PCLs, and near other valued resources.
- While we generally support the proposed action, we do not have agreement around support for any of the **alternatives considered but eliminated** (no action alternative, young plantation thinning only, limiting mature forest management).
- We would appreciate more transparency in messaging in that **any scale of treatment is likely insufficient** to prevent catastrophic fires under **extreme weather** (e.g., east wind events) and that any fuels treatments would have a **time limitation**.
- Although not a primary driver of this project, we would appreciate a greater emphasis on the **community benefits** to be realized from this project—including economic contributions like **local jobs** and **funding for local schools**.
- **Q:** What are the **limitations for recurring maintenance** treatments with regards to the need for additional/new EAs?

- **Q:** Are the **wildlife species**' listing status in Table 10 limited to federal listings only? One member noted that the Cascade red fox should be listed as 'State Endangered' (and is currently listed as 'sensitive'). Please clarify.

Again, thank you for your efforts and for considering our comments herein! Please reach out to joshua.petit@southgpc.org for additional information or if any clarifications are needed.

Sincerely,

The South Gifford Pinchot Collaborative