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October 31, 2024

Erin Black  
District Ranger  
Mt. Adams Ranger Station  
2455 Hwy 141  
Trout Lake, WA 98650

Via website: <https://cara.fs2c.usda.gov/Public//CommentInput?Project=63961>

**RE: Comments on Little White Salmon Forest Resiliency and Fire Risk Mitigation Project Environmental Assessment**

Dear Ms. Black:

Thank you for the opportunity to comment on the Little White Salmon Forest Resiliency and Fire Risk Mitigation Project. Cascade Forest Conservancy's (CFC) mission is to protect and sustain forests, streams, wildlife, and communities in the heart of the Cascades through conservation, education, and advocacy. We represent over 12,000 members and supporters who share our vision for a forest where wild places exist and wildlife thrives. CFC recognizes that the Little White Salmon planning area is complex, diverse, unique, and presents many challenges. Although we acknowledge the Forest Service and the Washington Department of Natural Resources' (DNR) efforts to provide meaningful modeling and analysis for this project, we have noticed a faulty assumption that appears throughout the project file and seems to negatively impact the quality of many of the analyses. This is: the assumption that the no-action alternative will result in catastrophic wildfire while the proposed action will not result in any wildfire.<sup>1</sup> The draft Environmental Assessment (EA) and analyses seem to ignore that a catastrophic wildfire, while possibly less likely if the area experiences the modeled type of fire scenario, is still possible after the treatments are implemented. With these circumstances and considerations in mind, we have several concerns and questions regarding this EA and will address them below.

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<sup>1</sup> This assumption and faulty logic is particularly clear in the Wildlife Report. "The potential loss of suitable habitat in the long-term due to high severity fire would be an additional cumulative effect" is referenced under the no action discussion for every species discussed, while there is no discussion around potential impacts of wildfire in the action alternative. NEIL CHARTIER, LITTLE WHITE SALMON FOREST RESILIENCE AND FIRE RISK MITIGATION PROJECT WILDLIFE REPORT, 13 (Aug. 2024).

## **I. Intensity of Harvest**

CFC has several concerns about the intensity of harvest proposed in mature stands, the lack of strong protections for large trees, and the intensity of thinning in outer riparian reserves. Each sub-topic related to harvest intensity and large tree protection is covered in the following section.

### **A. Complex Mature Treatments**

CFC is concerned with the 549 acres of complex mature forests included in the forest resiliency part of the proposed action.<sup>2</sup> It is not clear from the proposal what the thinning of the complex mature stands is supposed to achieve. From the EA it appears that these stands are not located along Potential Control Lines (PCLs) and are not receiving any regeneration patches, the latter of which suggests there is not a root rot problem. All of this information, along with the fact that the documents identify the stands as “complex,” suggests that these stands do not need any active management in the form of timber harvest. Mature stands that are already showing complexity are on the cusp of old-growth; the negative impacts of treatment to soils, the understory native vegetation, the possibility of an infestation of invasives, and impacts to wildlife dependent on mature forests likely outweigh any benefits of accelerating individual tree growth. Additionally, it is Forest Leadership’s intent<sup>3</sup> to only manage in mature stands for ecological reasons. No clear and convincing ecological justification for these particular stands has been made in the project file. Therefore, CFC requests all 549 acres of complex mature stands be dropped from the treatment plans.

### **B. Diameter Limits for Matrix Stands**

We support the 20” diameter limit proposed for LSR stands in the proposed action. We also request the addition of a 30” diameter limit for Douglas firs and no limit for grand fir or other tree species in matrix stands. Additionally, trees over 40” in diameter are particularly rare, important as habitat features, and sensitive to soil impacts from large machinery and should receive a surrounding no-cut buffer of 1.5 to 2 drip lines. We request the Forest Service add a 30” diameter limit for Douglas fir in the matrix stands and a 1.5 to 2 drip line buffer for all 40” diameter trees in the project area.

### **C. Other Mature Stands**

Many mature stands identified as “relatively uniform in structure” have been identified to receive either a reduction to 40% or 45-55% canopy cover. This intensity seems unnecessarily aggressive, particularly for the westside stands where this type of logging activity will not offer significant fire-risk reduction benefits and could exacerbate cumulative risks and worsen the

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<sup>2</sup> LITTLE WHITE SALMON FOREST RESILIENCY AND FIRE RISK MITIGATION PROJECT DRAFT ENVIRONMENTAL ASSESSMENT, 23 (Sept. 2024).

<sup>3</sup> “Commercial harvest in mature forest will not be considered for economic purposes only.” APPENDIX F. LITTLE WHITE SALMON MATURE AND OLD GROWTH MAPPING PROCESS DOCUMENTATION, 1 (Dec 2023).

overall health and resilience of the local ecosystems. During a recent DNR-hosted field tour to assess impacts from the Williams Mine Fire, observations and Forest Service reports indicated that denser, untreated stands were less affected by fire than heavily thinned areas. This finding – particularly relevant given the fire’s proximity to the Little White Salmon watershed – suggests that fire behavior here differed from some assumptions posited in Little White Salmon planning documents regarding treated versus untreated stands. This new information supports a more cautious approach for managing mature forests. If the idea is to create heterogeneity at the landscape scale, a much better place to focus logging reductions of this degree are young and mid-age plantation stands.

In addition to not necessarily creating the fire risk reduction the agency expects, the negative trade-offs from this level of treatment intensity in mature stands is notable. Considerations such as soil disturbance, loss of intact habitat features, and carbon sequestration should be accounted for and weighed when assigning prescriptions.<sup>4</sup> Due to these numerous impacts, we request thinning in older stands, even those that are “relatively uniform in structure,” generally be less aggressive (60% residual canopy cover). There has been much discussion around how much of the overall watershed is being treated relative to how much of the watershed is being left alone to help justify the intensity of the proposed treatments. However, that point ignores the concentration of treatments. Most of the 13,000 plus acres being treated are all within the eastern part of the watershed. The cumulative effects from those treatments—most of which are reducing the canopy to 40 or 45% residual canopy cover—is significant. The concentrated nature of these proposed treatments suggests that, at the very least, the intensity of thinning in the mature, more uniform stands should be more varied to create more heterogeneity on the landscape and reduce cumulative impacts. Additionally, this push for heterogeneity at the planning area-scale also seems to ignore the clearcut logging that occurs just to the south and the east, and it prioritizes human-made heterogeneity over naturally-created heterogeneity through fire and other disturbances like root rot. It is unclear in the EA and project files why the agency believes human-made heterogeneity is needed, particularly in the mature stands.

#### **D. Potential Control Lines and Landscape Treatments**

We are generally supportive of the landscape treatments planned for units adjacent to the PCLs<sup>5</sup>, as we understand they aim to enhance fire resilience by incorporating a diversity of restoration targets that reflect reference spatial patterns and structural stages across the landscape. Given that some of these units are mature forests, we believe some are already well on their way to developing the structural attributes associated with fire resilience. While we recognize the goal

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<sup>4</sup> Jeffery D. Kline et al., *Evaluating carbon storage, timber harvest, and habitat possibilities for a Western Cascades (USA) forest landscape*, 26 ECOLOGICAL APPLICATIONS 2044 (2016) (“Our objectives were to (1) characterize the general relationships (shapes and degree of complementarity or competition) of production possibilities for combinations of carbon storage, timber, and habitat, and (2) identify management variables that most influence joint production relationships.”)

<sup>5</sup> Definitions and terms referenced from: CHARLES HERSEY & ANA BARROS, THE ROLE OF SHADED FUEL BREAKS IN SUPPORT OF WASHINGTON'S 20-YEAR FOREST HEALTH STRATEGIC PLAN: EASTERN WASHINGTON (Jan 2022).

of accelerating these desired conditions, we feel that reducing canopy cover to 40% is aggressive for these mature stands.

Instead, we encourage the Forest Service to consider a more conservative approach that preserves mature forest qualities while still promoting a resilient, fire-adapted structure. For example, maintaining clumps around older, vigorous trees, creating snags to support habitat, leaving downed logs, and establishing gaps where diverse tree species are present in the understory would all support ecological integrity and fire resilience. By carefully balancing canopy reduction with these priorities, treatments can enhance the natural resilience of these mature forests while retaining their unique ecological values. Is there a reason more traditional shaded fuel breaks were not considered in this proposal? It is possible more traditional shaded fuel breaks paired with less aggressive landscape treatments along PCLs would better promote a resilient, fire-adapted system.

### **E. Thinning Intensity Outer Riparian Reserves**

CFC is concerned about the level of thinning proposed on some outer riparian reserves. The EA notes that some early-seral stands will leave the outer riparian reserve with a 30% residual canopy cover and other riparian reserves will be thinned to leave 40% residual canopy cover. We believe this level of intensity within the riparian reserve is too high to meet the Aquatic Conservation Strategy and will unduly impact the microclimate of the riparian corridor.<sup>6</sup> Some riparian areas may be overly dense due to previous mismanagement, but a reduction of this severity is not a well-tuned approach for correcting the problem. CFC requests a lighter touch within the outer riparian reserves.

## **II. Identification & Removal of Old-Growth from the Proposal**

CFC is supportive of the agency's conservative approach to identifying old-growth in the project area. We are also strongly supportive of the agency's choice to remove all of the 2,351 acres from the project area to ensure compliance with Executive Order 14072. As the agency knows, fire risk is lower in old-growth forests compared to young forests, and these areas retain moisture and mitigate temperature rises better than logged stands.<sup>7</sup> These areas represent important habitat refugia for a variety of species, both old-growth obligates and others, and as a relatively rare habitat type in the region, it is critically important that old-growth is protected and preserved across the Forest.

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<sup>6</sup> Michael M. Pollock, Timothy Beechie & Richard Bigley, *Stream Temperature Relationships to Forest Harvest in Western Washington*, 45 J. OF THE AM. WATER RESOURCES ASS'N. 141, 143 (2009) ("It has also been observed that the microclimate impacts of upland forest removal such as increased air temperatures, reduced relative humidity, and increased wind speed, extended hundreds of meters into adjacent forests, distances far greater than the width of most riparian buffers").

<sup>7</sup> Harold S. J. Zald & Christopher Dunn, *Severe fire weather and intensive forest management increase fire severity in a multi-ownership landscape*, 28 ECOLOGICAL APPLICATIONS 1068 (2018); Jiquan Chen et al., *Contrasting microclimates among clearcut, edge, and interior of old-growth Douglas-fir forest*, 63 AGRIC. & FOREST METEOROLOGY 219 (1993).

### III. Invasive Species

The introduction of invasive species is a serious concern in this watershed, particularly in the mature stands where there are no or very few infestations currently. Tours of past timber harvest sites on the GPNF reveal that, despite efforts to mitigate it, timber harvesting has led to the introduction and spread of invasive plants. Preventing the spread of invasives, especially in mature stands that currently have native understories, should be a priority of project implementation and it should be factored in much more fully when weighing the negative and positive impacts of logging in areas currently free from large infestations of invasive plants. As the agency knows, it is incredibly hard to undo once the infestation happens. CFC acknowledges there are PDCs to help prevent the spread of invasives, but the current application of this approach will likely not suffice in preventing new infestations. We, therefore, encourage the agency to A) improve invasive plant mitigation processes during logging, B) include post-harvest surveys to identify and treat introduced invasive plants, and C) integrate this known reality in the balance of impacts being considered for forest stands that are currently free from significant infestations of invasive plants.

### IV. Fire Risk Analysis & Conclusions

CFC has several questions and concerns around the fire risk analysis, its conclusions, and its implementation. We request that these questions and concerns be addressed before a decision is made by the Responsible Official.

- Temporal Nature of the Benefits: Currently, the EA presents the prescriptions as if reducing the canopy down to 40% canopy cover as a fire risk benefit would last indefinitely, even though the implementation of subsequent treatments needed to maintain this temporary fire risk reduction is highly unlikely. With the lighter treatments, the EA acknowledges re-growth and how that would impact the stands over time, but instead of being clear that the same re-growth process would impact the stands with heavier treatments, the EA and fuels report state that the treatments would be effective “through the modeled period.”<sup>8</sup> To the average citizen, this language and discussion could easily be interpreted to mean that the agency believes the proposed action will address the fire risk indefinitely. Additionally, it is not clear from the EA and fuels report how the watershed’s fire regime impacts the longevity of the treatments. For example, the effectiveness of treatments might last longer in frequent fire forests, but not in westside forests due to the re-growth rate and type of fire typically experienced in the area. In other words, the temporary nature of the treatments, the other limitations of the modeling, and the fire regime implications should be made more clear in the analysis within the EA and fuels report.

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<sup>8</sup> LITTLE WHITE SALMON FOREST RESILIENCY AND FIRE RISK MITIGATION PROJECT DRAFT ENVIRONMENTAL ASSESSMENT, 49 (Sept. 2024).

- Applicable Lessons from the Williams Mine Fire: CFC requests the Forest Service incorporate lessons from the Williams Mine Fire into the fuels and fire risk mitigation analysis. As referenced above, from the areas observed on the Williams Mine Fire field tour, it appears that many untreated stands in the fire perimeter did not burn and the treated stands burned at a higher severity than expected. That information seems contrary to what would be expected in this area and could have large implications for the proposed action's effectiveness at addressing fire risk. CFC feels it is important to layer in this recent fire's behavior into any final decisions around fire risk reduction activities.
- Prescribed Fire Implementation: Generally, CFC is supportive of prescribed fire as a management tool. However, we feel it's important to acknowledge how difficult it is to actualize this management practice. The agency has repeatedly mentioned that keeping up with prescribed fire has been difficult. Due to these difficulties, we ask that the practicality of implementation be taken into account in the analyses and when assigning treatments, especially given some of the high-intensity thinning planned in several units and the critical role that prescribed fire plays in meeting resilience goals. If the treatment cannot meet its objectives without prescribed fire, we ask that the likelihood of the prescribed fire management occurring be taken into account as part of the analysis and decision, especially given the near-term negative impacts of heavy thinning for wildlife, soils, and carbon. Currently it appears all the fire modeling looking at the effectiveness of treatments assumes a maintenance treatment will occur 10-15 years after thinning. All the modeling should look at the effectiveness of treatments without maintenance treatments since there is high uncertainty regarding whether these maintenance treatments—particularly broadcast burning— would occur.
- Applicability of Maintenance Treatments: It is not clear in the EA which treatments are covered when discussing maintenance treatments. Does it include all stands with a fuels component? Is it just along PCLs? If it is all stands with fuel treatments, does that mean the temporary roads would need to stay on the landscape until the maintenance treatments are done in 10-15 years? Was the longer time frame for temporary roads included in the impacts analysis for the road system, particularly on waterways?
- Catastrophic Wildfire: In the EA and in the specialist reports, there is a large focus on the negative impacts of a catastrophic wildfire in the no action alternative. While that might be accurate, a catastrophic wildfire is still possible even with the proposed treatments implemented. The way the EA reads, a catastrophic wildfire is not really contemplated as possible in the proposed action. This is especially concerning considering the fact that fire risk reductions are unknown, temporary, and only likely in a very specific fire weather scenario. In the case of high-intensity, wind-driven fires (like other recent fires in the area) or in the case of fires like the Williams Mine Fire, we cannot necessarily expect fire impacts where treated stands remain free from catastrophic fire and untreated stands burn catastrophically. The large focus on the negative impacts of a catastrophic wildfire for only the no action alternative unbalances the analysis in favor of management. The analysis should also take into account the possibility of a catastrophic wildfire after treatments. The risk will still be there after treatment and should be part of the analysis and weighing of options when making final management decisions.

## V. Northern Spotted Owl Management

CFC has questions and concerns about the northern spotted owl (NSO) related management decisions and discussion in the EA. In particular, we have questions about the audio detection data presented in the EA. From the language in the EA, it is unclear as to whether NSOs were recorded as a “non-detection” in 6 out of the 7 activity centers surveyed due to the absence of NSO vocalizations or because they were presumed to be absent due to the presence of barred owls in those areas. The EA states:

Without management intervention (e.g. barred owl control), of which none is currently planned, it is highly unlikely that northern spotted owls will recolonize the territories that were surveyed during the life of the project or the time it will take for suitable habitat downgraded to unsuitable habitat as a result of the project to develop back into suitable habitat (up to 20 years). ***Thus, the remaining surveyed historic activity centers were determined to be not occupied.***<sup>9</sup>

As the EA language suggests, was the presence of barred owls what drove the removal of Limited Operating Procedures (LOPs) from 6 of the 7 activity centers? Also, what protocols were used to complete the audio surveys? The data and methodology were not shared in the EA and the wildlife report references the Biological Assessment, which is not yet available to the public.

With the information available, and the way the data is presented in the EA, CFC believes a lighter touch (60% residual canopy cover) is called for in all seven of the historic NSO activity centers that were surveyed. A lighter touch in these areas will still allow the Forest Service to meet their project objectives while also mitigating impacts to NSOs. Given the “likely to adversely affect” determination, adding more mitigation measures would be prudent and help ensure there are no significant impacts from the project in compliance with the National Environmental Policy Act (NEPA).

## VI. Road Considerations

As the Forest Service knows, the road system on the Forest is too large to maintain and causes a variety of negative impacts including but not limited to degrading water quality and fragmenting habitat. Therefore, CFC supports the decommissioning and closures proposed in the EA and encourages the Forest Service to add additional decommissioning and closures into the project plans. The Little White Salmon planning area is one of the top areas on the GPNF where there is

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<sup>9</sup> LITTLE WHITE SALMON FOREST RESILIENCY AND FIRE RISK MITIGATION PROJECT DRAFT ENVIRONMENTAL ASSESSMENT, 67 (Sept. 2024) (emphasis added).

a density of unneeded ML-1 and ML-2 roads that are either actively causing harm to the environment or at high risk of causing harm.<sup>10</sup>

We also would like to encourage the Forest Service to mitigate and restore known roadways that are harming the environment instead of just updating their database status. For example, roads 6600062, 6600064, and 6600064 are all noted as having “[e]xtensive current water damage” in the EA.<sup>11</sup> The EA also notes that these types of issues will only be corrected if the road is proposed for timber haul. First, are these three routes proposed for haul? Second, CFC would like to see all known roads causing “extensive current water damage” restored, closed, decommissioned, and/or otherwise mitigated as part of the project, regardless of haul status.

## **VII. Project-Specific Forest Plan Amendments**

The agency’s amendment process is currently not compliant with the National Forest Management Act’s (NFMA) 2012 Planning Rule or NEPA. We have two primary issues with the proposed amendment: 1) the analysis is incomplete and the proposed language is insufficient, and 2) the EA and specialist reports fail to discuss and analyze impacts on the special interest areas. CFC requests the agency update the EA and other relevant documents with the missing information and needed analysis or drop the units within the special interest areas to come into compliance with the NFMA and NEPA.

### **A. Amendment Process & Proposed Language**

We feel it is important to raise the issue of 2012 Planning Rule compliance to ensure any amendment to the Gifford Pinchot Land and Resource Management Plan (GP Forest Plan) is done in compliance with the NFMA. We are concerned that if the amendment does not comply with the 2012 Planning Rule, it could set a precedent for future misapplied processes that could result in unwarranted environmental damage and undermine the integrity and intent of special areas and special interest areas. In sum, as it is currently presented in the EA, the agency failed to follow the 2012 Planning Rule and is, therefore, currently in violation of NFMA.

The current Planning Rule requires the following process for every plan amendment: 1) determine the need for a forest plan amendment, 2) identify which of the substantive requirements in 36 C.F.R. §§ 219.8 through 219.11 are “directly related” to the needed amendment, 3) apply those to the amendment, and 4) create new Forest Plan requirements that address the same protection needs.<sup>12</sup> In short, it appears the agency did not do step three or four properly in this case.

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<sup>10</sup> CFC sent this analysis in map form to the South Zone Planning Team in March. Email from Shiloh Halsey, Director of Programs, Cascade Forest Conservancy (March 18, 2024 4:26 PM PST) (on file with author).

<sup>11</sup> LITTLE WHITE SALMON FOREST RESILIENCY AND FIRE RISK MITIGATION PROJECT DRAFT ENVIRONMENTAL ASSESSMENT, 32 (Sept. 2024).

<sup>12</sup> 36 C.F.R. § 219.13 (b) (2024).

CFC has noted that at least one of the thinning units proposed is located within the boundaries of a special interest area (9L) near the Monte Cristo RNA. Conversations with the agency around the proposed amendment led CFC to believe that the special interest areas would only be impacted by management of adjacent units, given the focus on visual quality impacts in conversations and a lack of discussion around thinning needed within the special interest area. The supplemental scoping notice seems to suggest only a minimal amount of tree removal is proposed, i.e. on the scale of hazard tree removal or hand thinning of very small trees, given this statement: “[i]t is worth noting that while trees will be removed to meet project objectives and sold as part of timber sales, the primary purpose of this project is not for timber harvest.”<sup>13</sup> However, Unit 303695A is slated to be cut down to 40% residual canopy cover, and the timber is to be sold, making the prescription a scheduled timber harvest for the purposes of the GP Forest Plan. The MACs for 9Ls do not say anything about the purpose of the timber harvest. The MACs only state the following:

1. There will be ***no scheduled timber harvest***.
2. Trees should be removed when they are a hazard to life or property. Logs and debris from these operations should be yarded away from roads, trails, and other concentrated use areas. Trees may be removed to enhance recreation; e.g., the creation of a scenic view or construction of a road. Ordinary timber salvage should not be permitted.<sup>14</sup>

Given these standards, the amendment-related analysis in the EA and specialist reports should have addressed more than just the scenery standards for special interest areas and should have included the timber production restrictions as well. It is clear from the MACs for any 9L areas that large amounts of timber harvest, regardless of their primary purpose, could undermine the management goals and desired conditions. Therefore, the EA and accompanying specialist reports should have included a discussion around the timber harvest restriction and whether or not any changes to the language were required for this project. There is also no discussion or identification of new standards that would replace the existing timber restrictions – step four of the 2012 Planning Process above.<sup>15</sup>

Finally, the language of the amendment as written does not seem to limit itself to the project area or the temporary time frame suggested in the EA and other relevant documents. The GP Forest Plan’s proposed amendment language is very broad and read alone would not be limited to the proposed stands for the proposed amount of time. CFC requests that any amendment language be

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<sup>13</sup> LITTLE WHITE SALMON SCOPING SUPPLEMENT, 2 (July 2024).

<sup>14</sup> GIFFORD PINCHOT NATIONAL FOREST LAND AND RESOURCE MANAGEMENT PLAN, FINAL ENVIRONMENTAL IMPACT STATEMENT, IV. 92 (1990) (emphasis added).

<sup>15</sup> See *supra* note 12; see also CFC’s scoping comments Section I., which discusses the 2012 Planning Rule requirements in detail and are incorporated here by reference. CFC Final Comments Scoping Little White Salmon 5.3.2023, 1-3 (May 3, 2023).

specific to ensure that the amendment only applies to the proposed scope of the project specific amendment and is not accidentally broadly applicable.

In sum, the EA and accompanying specialist reports do not currently comply with the requirements of the 2012 Planning Rule. The agency has failed to analyze and consider an amendment to the timber harvest restrictions for 9L special interest areas and has not applied all the relevant substantive requirements in sections 219.8 through 219.11. New timber harvest restrictions and scenery protections should replace any amended standards that are deemed in need of updating. Without new standards for timber harvest and scenery protections for the affected special interest areas, the amendment does not comply with the NFMA.

## **B. Impacts to Special Interest Areas**

The EA potentially violates NEPA by failing to address direct, indirect, and cumulative impacts to the 9L special interest areas near the Monte Cristo RNA. Currently, the only impacts discussed for these areas are scenery-related. CFC's understanding is these areas "are unique because they include features deserving special management."<sup>16</sup> If these areas are deserving special management due to their plant communities or other potentially sensitive resource reasons, then special attention and consideration should have been given in the EA and relevant specialist reports. In the EA and specialist reports, the purpose of the special interest areas was not clearly discussed, and the impacts the thinning and fuels treatments would have on these special interest areas were not discussed either.

In sum, the EA, as currently written, has not analyzed all of the potential environmental effects by failing to directly discuss impacts to the special interest areas near the Monte Cristo RNA. The EA and relevant specialist reports should be updated to discuss all of the direct, indirect, and cumulative impacts to the special interest areas, or the units in these areas should be dropped from the plans to ensure compliance with NEPA.

## **VIII. Miscellaneous**

CFC also has a variety of project aspects we support and other concerns and questions regarding the PDCs and specialist reports. First, we will address other project components and aspects that are not otherwise addressed in this letter:

- Custom No-Cut Buffers for Temperature Limited Streams: CFC is supportive of the larger custom no-cut buffers to better protect the identified impaired reaches of the Little White Salmon River and Moss Creek.
- Tree Planting to Increase Species Diversity: CFC is supportive of efforts to diversify the composition of tree species in the watershed.

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<sup>16</sup> GIFFORD PINCHOT NATIONAL FOREST LAND AND RESOURCE MANAGEMENT PLAN, FINAL ENVIRONMENTAL IMPACT STATEMENT, IV. 90 (1990).

- Golden Chinquapin Enhancement: CFC is supportive of measures to enhance growing conditions for golden chinquapin.
- Amphibian Corridor Creation: CFC is supportive of creating amphibian corridors. The Wildlife Report used the word “may be implemented.”<sup>17</sup> We encourage the Forest Service to instead make this a mandatory part of the project.
- Aquatic/Riparian Enhancement: CFC is supportive of re-establishing appropriate drainage channels and channel forms that are suffering degradation from existing and abandoned temporary roads in the project area. We support repairing un-authorized user created trails. We also support felling trees in stands 303197A and 301927A towards the creeks using hand-based mechanisms only.
- Snag and Down Wood Enhancement: CFC supports the creation of snags and increasing the density of downed wood in strategic locations.
- Avoiding Old-Growth Inclusions: CFC supports the PDC that requires temporary roads and landings to be re-routed to avoid any old-growth inclusions.

Specific concerns and questions regarding documents in the project file including Appendix D Project Design Criteria and Mitigation Measures:

- LSR DBH Limit: The LSR 20” diameter limit does not appear to be included in the PDC Appendix. We are supportive of this limitation and want to ensure its inclusion in the PDCs.
- Temporary Stream Crossings: The PDCs on stream crossing for temporary roads talks about crossing within the EA or those that “have approval prior to construction.”<sup>18</sup> It is not clear whether crossings of this type, those added in after the EA is signed, were accounted for and analyzed. How many extra crossings beyond those in the EA were analyzed in the hydrologic analysis and other relevant analyses? If some estimated number of these post-decision crossings weren’t accounted for in the analyses, we ask that the analyses be updated to include them.
- Silviculturist Report: CFC believes that a silviculturist report should be added to the project file. We have many questions and concerns that could have been addressed in a silviculturist report including but not limited to clear ecological justifications for treatments in mature stands and how current canopy conditions are being impacted by existing disturbances. For instance, in units affected by root rot, will the regeneration patches intended to limit its spread be incorporated into the prescribed treatment or added on top of it? For example, if a unit is set to retain a residual canopy cover of 40%, would the regeneration patch be included within that 40% canopy cover, or would the canopy be reduced to 40% with additional reduction for the regeneration patches? The EA is not clear on these points. Historically, most of this information would be included in a silviculturist report. Although we appreciate the Forest Service attempting to provide all

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<sup>17</sup> NEIL CHARTIER, LITTLE WHITE SALMON FOREST RESILIENCE AND FIRE RISK MITIGATION WILDLIFE REPORT, 43 (Aug. 2024).

<sup>18</sup> APPENDIX D. LITTLE WHITE SALMON PROJECT DESIGN CRITERIA AND MITIGATION MEASURES, 14 (Sept. 2024).

the relevant information in the EA itself, given the page limitations of the EA, it appears there was simply not room to adequately address all the needed information. Therefore, we believe the project file could greatly benefit from a silviculturist report that addresses the concerns raised here and other relevant concerns raised elsewhere in these comments.

## **IX. Conclusion**

In conclusion, CFC has several questions and concerns about the proposed action, including but not limited to the inclusion of 549 acres of complex mature in the project, the intensity and scale of harvest in mature stands generally, the lack of a 30" diameter limit for Douglas-fir in matrix stands, insufficient consideration or mitigation of invasive plant species, a faulty assumption that the impacts of wildfire do not need to be considered in wildlife analyses and other projections if logging treatments occur, and concerns regarding how the fire modeling was applied.

We understand this area is particularly challenging for the agency and appreciate the opportunity to comment on the EA for the Little White Salmon Forest Resiliency and Fire Risk Mitigation Project. We look forward to working with the agency and other partners to finalize this project. Please let us know if you have any questions regarding these comments and concerns.

Sincerely,

A handwritten signature in black ink, appearing to read 'Ashley Short', with a stylized 'A' and 'S'.

Ashley Short  
Policy Manager  
Cascade Forest Conservancy  
[Ashley@cascadeforest.org](mailto:Ashley@cascadeforest.org)