

**To:** USFS Region 6 Regional Forester  
**Re:** NWFP Amendment #64745 Public Comments  
**From:** The South Gifford Pinchot Collaborative  
**Date:** 3-10-25



To Whom It May Concern:

Please accept this letter as formal comments on behalf of the **South Gifford Pinchot Collaborative** (SGPC) pertaining to the **Northwest Forest Plan (NWFP) Amendment #64745 Draft Environmental Impact Statement (DEIS)**. Our group has thoroughly reviewed the DEIS and has developed the below list of associated recommendations/thoughts related to where, how, and when to implement specific management activities on Gifford Pinchot National Forest (GPNF) and the Pacific Northwest (PNW) more broadly.

The SGPC formed in December of 2011 through combining the former Mt. Adams District Collaborative and Lewis River Collaborative. Our intent is to develop solutions to natural resource issues facing the area with a common vision to move beyond controversy towards management of our public lands that supports both restoration of our forestlands and revitalization of rural communities. In particular, the SGPC's mission is to collectively improve the development, facilitation, and implementation of projects that enhance economic vitality, forest ecosystems, outdoor recreation, and public safety on the south end of GPNF and surrounding communities. The SGPC has over 40 members with a diversity of backgrounds including (but not limited to) conservationists, community members concerned about GPNF, local government agency personnel, former US Forest Service (USFS) employees, the forest products industry, and the outdoor recreation community. For more information about the SGPC, go to [www.southgpc.org](http://www.southgpc.org).

The SGPC recognizes the unique ecological, socio-cultural and spiritual values associated with PNW forests. As such, we support efforts to update the NWFP to proactively manage and protect these valued resources while also prioritizing rural community wellbeing, including tribal lands. While we have reviewed the DEIS in its entirety, we have focused our efforts on **Alternative B** (referred to as 'the proposed action'). We recognize and appreciate the immense collaborative effort undertaken by the Federal Advisory Committee (FAC) to develop these consensus recommendations.

Broadly, the **SGPC supports the following four overarching attributes of Alternative B** outlined in the DEIS:

- Tribal Inclusion, incorporation of Indigenous Knowledge in decision making, and opportunities to expand co-stewardship on National Forest System lands to better address tribal cultural needs, achieve forest management goals and meet Agency trust responsibilities.
- Modified plan direction for moist and dry vegetation communities within Late-Successional Reserves (LSR), Adaptive Management Areas (AMA), and Matrix to address conservation of old-growth and mature forests and biodiversity threatened by uncharacteristic disturbance associated with climate change while providing allowances for ecological forest management principles in some older stands in Matrix and AMAs.
- New and modified plan direction to proactively enhance resistance and resilience of forest ecosystems and communities to wildland fire within community protection areas.
- Additional plan content to sustain rural and underserved communities.

Additionally, we have the following **specific comments** (i.e., management recommendations, sideboards) pertaining to the implementation of NWFP amendments **on GPNF**:

- Tribal inclusion
  - All relevant regional tribes (e.g., Yakama, Cowlitz) should be engaged in USFS planning efforts.
  - The USFS should consult with tribes about local land-use histories to incorporate indigenous/traditional ecological knowledge (TEK) where appropriate.
  - USFS management practices should consider culturally significant places and species (e.g., camas, huckleberries) on GPNF and adjacent tribal lands and consult with tribes to identify and protect valued resources.
- Local USFS leadership
  - District Rangers (e.g., Mt. Adams Ranger District) should have management authority and latitude to implement the proposed action based on local resource conditions and site-specific considerations.
- Climate change adaptability and transitional forests (SPECIES)
  - We appreciate efforts to distinguish proposed management treatments on moist versus dry forest types. However, we also believe this dichotomy could be problematic on transitional forests like GPNF.
  - In transitional watersheds/stands on GPNF, we recommend additional analyses and consultation with local forest collaboratives to incorporate relevant local knowledge.
  - We support the use of the best available science (i.e., scientific consensus) and local knowledge to project future site-specific/local climate change impacts.
  - We support proactive efforts to anticipate temperature and moisture regime changes and manage species compositions accordingly in USFS planning.
- Site-specific prescriptions
  - In addition to broader climate change impacts, we support USFS management that addresses forest health threats such as insects, pathogens, and drought.
  - We support a tailored approach that considers individual site characteristics while also embracing a landscape-scale management approach.
- Fire resilience and responsiveness
  - We support USFS efforts to improve routes of ingress/egress to allow first responder access and protect rural communities (e.g., Mill A, Willard, Trout Lake, Stabler, North Woods) and adjacent valued resources.
  - We support the maintenance and improvement of potential operational delineations (PODs) and potential control lines (PCLs).
- Rural community well-being
  - We support USFS contracting that prioritizes local timber companies and efforts to restore local mill infrastructure.
  - We support flexible contracting (e.g., timing, hiring) for local timber companies.
  - We support efforts to engage local communities in forest management issues and shared learning opportunities (e.g., rural youth, experiential learning).

- Collaboration
  - We support regular engagement with relevant forest collaboratives (e.g., SGPC, Pinchot Partners) to ensure transparency in decisionmaking and to provide social license to the USFS.
  - We support an 'All-Lands' approach to managing GPNF that leverages partnerships between the USFS and other federal (e.g., US Fish & Wildlife), state (e.g., WA Dept. Natural Resources), local (e.g., Skamania/Klickitat County Commissioners), and tribal (e.g., Yakama Nation, Cowlitz) entities.

Thank you for your efforts and for considering the comments herein. Please reach out to the SGPC's Executive Director at [joshua.petit@southgpc.org](mailto:joshua.petit@southgpc.org) for any necessary clarifications and/or additional information.

Sincerely,

The South Gifford Pinchot Collaborative  
*'Working together for the greater good!'*

**Active Member Organizations**

Backcountry Horsemen of Washington  
Backcountry Hunters and Anglers  
Cascade Forest Conservancy  
Concerned Citizens  
Confederated Tribes of the Yakama Nation  
Green Diamond Resources  
High Cascade  
Interfor  
Mt. Adams Resource Stewards  
Rocky Mountain Elk Foundation  
Skamania County Commissioners  
Skamania County Noxious Weed Control  
Washington Department of Fish and Wildlife  
Washington Department of Natural Resources  
Washington Trails Association