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Submitted to:
<https://cara.fs2c.usda.gov/Public//CommentInput?Project=65884>

Subject: Plantation Thin and Potential Control Line Treatment Project

Dear Forest Supervisor Kovarik:

The Sierra Club has reviewed the draft Environment Assessment (EA) for the Plantation Thin and Potential Control Line Treatment Project, and we appreciate the opportunity to provide comments, concerns, and suggestions regarding this project. Unfortunately, the proposed action and attendant documentation is inconsistent with applicable laws, regulations and plans, both substantively and procedurally. The Forest Service must substantially revise its proposal, analyses and documentation.

Overview

The Washington State Chapter of the Sierra Club includes more than 100,000 members and supporters who have been working to protect communities and the planet. With more than 3.5 million members nationally, the Sierra Club has the largest membership of all environmental public advocacy groups in the United States. We are the oldest engaged and enduring grassroots organization in the United States.

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), as well as a history of living near and recreating in these forest lands. Our activism reflects our deep and enduring commitment to protecting these lands, and the important role that National Forest lands have in maintaining terrestrial and aquatic ecosystems that are integral to the health and well-being of the plants, animals, and humans that rely upon them.

Project Planning Documents

The Plantation Thin and Potential Control Line (PCL) Treatment Project is exceedingly large in both spatial and temporal terms. The draft EA is only an outline of proposed actions that are intended to be carried out on almost 214,000 acres of the National Forest over the next 56 years. The entire Gifford Pinchot National Forest is 1,373,572 acres, with the Mt St Helens National Volcanic Monument (110,000 acres) and seven wilderness areas (292,000 acres) reducing the managed area to 971,570 acres. Therefore, the area to be affected by this project represents **22%** of the managed acreage of GPNF. Minor changes in the project documents could have major impacts on the Forest, and it is imperative that the project documents “get it right” from the start. Additionally, the scale of this project requires that project documents are prepared that anticipate the changeability of both the natural condition of the Forest and the teams of people who are carrying out this project in the future. Adequate guardrails must be in place to ensure that the intent of the project is not lost as the years progress.

EIS Requirement

This Project must be analyzed in an Environmental impact Statement. An EA is not compliant with laws including NEPA, NFMA, and Endangered Species Act.

Requirements for NEPA compliance set forth in 36CFR§220.6(2)(c) specify that

If the responsible official determines, based on scoping, that it is uncertain whether the proposed action may have a significant effect on the environment, prepare an EA. If the responsible official determines, based on scoping, that the proposed action **may have** a significant environmental effect, prepare an EIS. [emphasis added]

The resource conditions that are to be considered include “Federally listed threatened or endangered species or designated critical habitat,” and “Inventoried roadless area(s)” 36CFR§220.6(2)(b)]. Given the fact that this project covers 22% of the managed acres of the Gifford Pinchot National Forest, and is to be carried out over a period of at least 56 years, it is logical to assume that the proposed action **may have** a significant environmental impact, and that an EIS must be prepared.

The Land and Resource Management Plan (LRMP) of the GPNF was completed in 1995. 36CFR§219.7 specifies that LRMPs should be amended at least every 15 years in order to reflect the changed conditions on the Forest. Ideally, the GP would update the LRMP in order to analyze and prescribe a management condition such as this project, which covers 22% of the managed acres of the GPNF, as the LRMP is now 30 years old (and 15 years past due for an amendment). As the LRMP is not up to date, an EIS would provide the level of analysis required to adequately study the impacts of this large project on the Forest. No project should be approved for a longer period than the Forest Plan. Any plan such as this must be reevaluated in an EIS at least as often as the Forest Plan.

Prioritization

A prioritization matrix must be prepared for the project

A landscape scale project of this scope, intended to be carried out over at least 56 years, requires that there be decisions made to establish which projects will take precedence. A clear prioritization matrix will help in establishing the hierarchy of project importance, in particular when/if current Forest staffing changes over the years and the project document provides the sole point of reference for future management decisions.

This prioritization must present the guidelines with which the implementation of the project will be carried out. Some questions that might need to be answered:

- Will projects be designed to focus primarily on fire safety near developed areas? Will these projects be carried out first?
- Will ecological restoration for NSO habitat take precedence?
- Will projects with severe aquatic degradation take priority over commercial thinning?
- Will non-commercial thinning and burning be performed despite the cost to the Forest, and despite the challenges of scheduling prescribed burns (air quality, etc)?
- Will timber extraction through commercial thinning take precedence over those activities that cost the district money?
- How will the proceeds from commercial thinning sales be spent? Will these proceeds be used only for subsequent restoration projects within the project area?
- Which PCLs will take precedence? How will maintenance needs for PCLs be accomplished alongside new PCL treatments?

A structured decision matrix that attempts to quantify the prioritization decisions must be developed for the environmental document produced after review of comments on the Draft EA, whether an EIS, as requested in this Comment Letter, or a Final EA (referred to as the 'Environmental Document').

Monitoring

A Monitoring Plan must be described and developed

Any plan with a 56 year duration must include monitoring and periodic reviews to establish efficacy of projects, in particular those designed to improve both terrestrial and aquatic habitat. Is the project "increasing structural diversity" and "building resiliency"? Given the project design and how it's carried out, are conditions changing that result in lack of efficacy (ie climate change)? What are measurable parameters that can be used to chart the success of the program?

Note that monitoring of Forest projects is a requirement of the Northwest Forest Plan (NWFP), in which the Standards & Guidelines specify:

Monitoring is an essential component of natural resource management because it provides information on the relative success of management strategies. The implementation of these standards and guidelines will be monitored to ensure that management actions are meeting the objectives of the prescribed standards and guidelines, and that they comply with laws and management policy. Monitoring will provide information to determine if the standards and guidelines are being followed (implementation monitoring), verify if they are achieving the desired results (effectiveness monitoring), and determine if underlying assumptions are sound (validation monitoring). (NWFP, S&G p E-1)

Currently, the only discussion of monitoring within the EA is in Appendix C – Project Compliance, Notification, and Reporting of the draft EA. This appendix explains the monitoring that will be reported in the annual coordination meetings, which as described appears to be reporting only on impacts to Northern Spotted Owl: “It will include the actual acres of disturbance, individual suitable nest trees removed, and suitable habitat affected”. While these are important and necessary impacts that must be tracked, there are many other impacts that this project will have on the Forest: aquatic impacts due to thinning in Riparian Reserves, impacts to marbled murrelet nesting/foraging areas, efficacy of clearing for huckleberry management, and other project goals.

The Resource Specialist reports described in Appendix A: Plantation Thin Implementation Process would provide a suitable structure to a monitoring plan. These Resource Specialist reports would have been prepared prior to the implementation of annual projects, and would provide reference points for elements within each specialty that would be worth monitoring. It would be reasonable to expect that a regular monitoring program, combined with a scheduled status report, would provide a basic overview of the success of this decades-long project. For example, the Resource Specialist reports would delineate monitoring elements, annual implementation monitoring is carried out that is summarized in an annual report to be presented at the annual coordination meeting, and additional monitoring to demonstrate effectiveness and validation to be presented every 5-years would provide guidance for future project adaptations and adjustments.

A monitoring plan would clearly describe in the EA how the annual monitoring will take place, what will be measured and tracked, and how the forest will apply adaptive management to study the cumulative impacts of the project. This would describe when, why, and how they will make changes to future projects as a result of such monitoring.

Adaptive Management Review and Reporting / 5-year Supplement

We urge the FS to include an Adaptive Management component to the monitoring and compliance that we have requested. Given the number of years to complete the project, we request that there should be periodic reviews of the entire project, both as implemented to date and as contemplated still to be completed. In addition to the requested compliance and impact reports and periodic public participation, incorporating

information learned into the next stages of completion of the project is critical in all projects, but particularly in a project such as this one with a 52 to 56-year lifetime.

Neither a) the annual consistency reviews and reports required in the Draft EA and Appendix C, which reference the requirements of the Western Washington Restoration and Collaboration Zone Biological Assessment, nor b) the annual October proposed work descriptions, maps, scoping and public comment as provided for in the Draft EA and Appendix A, address the need for periodic review of the impact of the project to date as well as compliance with requirements of the entire project, nor the need for periodic public participation and public comment on the *effectiveness* of such a long term project.

For these reasons, the project should include provisions for a Supplemental Environmental Document to be prepared every 5 years throughout the course of the project life cycle. This Supplement should review the effectiveness and validation monitoring that has been completed, consider the efficacy of the project components, review the change in Forest conditions that have occurred over time, analyze the financial impacts of the project, and take into account public comments regarding these elements. Adaptive Management is an integral part of long-term forest management, and must be proactively designed in order to be successful. A 5-year Supplemental Environment Document would allow the Forest Service to study and consider the impacts of their actions, and change course where the need arises.

Inventoried Roadless Areas

The proposed action should specifically exclude any actions within Inventoried Roadless Areas.

The Draft EA on page 17 states that PCLs are proposed along roadsides that border some of the Inventoried Roadless Areas (IRAs) within the GPNF. There are 16 IRAs, identified in Table 4 of the Draft EA, into which the FS is proposing entry for treatment of materials less than 8-inches in diameter for a distance of 500 feet into the IRA.

First, we request maps and specific acreages of the portions of the borders of Inventoried Roadless Areas which are within the proposed PCLs. Given that the Federal Regulation 36 CFR § 294.13 (b) stipulates that any timber cuts in IRAs must be 'infrequent,' and given that the EA provides that there will be periodic maintenance of the PCLs, it is expected that the cutting of trees within the boundary of IRAs will be repeated over the course of the life of the Project. If maintenance is conducted as proposed, the trees that are within the IRAs will not have been replaced through natural planting and regeneration. Therefore, the timber cuts in the IRAs are not 'infrequent' as the use of that word would permit natural regeneration to persist.

Second, 36 CFR 294.13 (b) (1) (ii) states that the following type of cutting is permitted:

- (ii) To maintain or restore the characteristics of ecosystem composition and structure, such as to reduce the risk of uncharacteristic wildfire effects, within the

range of variability that would be expected to occur under natural disturbance regimes of the current climatic period;

However, the EA does not show or discuss how these requirements are met specifically regarding the IRAs. In order to comply with this rule, any final environmental document must include information about how the PCLs would ‘*reduce the risk of uncharacteristic wildfire effects*’ that would be within the stated “*range of variability*” specifically for the borders of the IRAs. A landscape cleared of all vegetation under 8” dbh is not consistent with a naturally occurring forest

Third, in addition we request that the Environmental Document must describe how the Project meets the requirements of Subsection (1):

(1) The cutting, sale, or removal of generally small diameter timber is needed for one of the following purposes and will **maintain or improve one or more of the roadless area characteristics** as defined in § 294.11.

Cutting small diameter timber for the PCLs that are within the borders of IRA must show how they will maintain or improve one or more of the Roadless Area Characteristics, as defined in 36 CFR § 294.11:

Roadless area characteristics.

Resources or features that are often present in and characterize inventoried roadless areas, including:

- (1) High quality or undisturbed soil, water, and air;
- (2) Sources of public drinking water;
- (3) Diversity of plant and animal communities;
- (4) Habitat for threatened, endangered, proposed, candidate, and sensitive species and for those species dependent on large, undisturbed areas of land;
- (5) Primitive, semi-primitive non motorized and semi-primitive motorized classes of dispersed recreation;
- (6) Reference landscapes;
- (7) Natural appearing landscapes with high scenic quality;
- (8) Traditional cultural properties and sacred sites; and
- (9) Other locally identified unique characteristics.

Fourth, for all the above reasons, any entry into IRAs for the purposes of PCLs must be reduced to the minimum extent possible.

Finally, fine detail maps of the IRAs included in this project must be included in a final Environmental Document.

Potential Control Lines (PCLs)

Proposed PCLs are not scientifically justified or mapped

PCL Widths

Despite the discussion on page 24 and 25 of the Draft EA presenting justification for the use of the 500 foot width on either side of the roadway for PCL treatment, the scientific basis for this extremely wide treatment category is not given. What is the rationale for 1,000' wide clear zone? Will the PCL width be the same for high elevation lands and low elevation lands? What is proposed in Riparian Reserves? (Also, note that while the text promises 3 justifications, only 2 are presented).

As the PCL work proposed through this project "would not go through the (annual) public review process described ... for the plantation thinning" (EA p. 21), it is imperative that the PCL limits and impacts are fully defined and analyzed within this programmatic Environmental Document, as it is the **only** time such limits and impacts will be investigated, described, or modified.

Categorical Exclusions

It is unclear how Categorical Exclusion (CE) Regulation referenced in the EA is pertinent, as this project is neither proposed as a CE, nor does the project meet the requirements of the referenced CE Regulation. Clearly, the 56,620 acres of PCL treatment planned through this project is clearly beyond the 3,000 acre allocation for a CE, as the cumulative effects of the 56 year project are far beyond those of a one-year CE project.

Therefore, any Environmental Document must include a discussion of Best Available Scientific Information to support the 500 feet width of linear fuel breaks proposed under the PCL portion of this Project. Even considering the CE Regulation referenced in the EA, the excerpt from 16 USC 6592d (3) below outlines the required consideration of the Best Available Scientific Information, as well as compliance with subsection (d) (2), which requires verification that all locations of the PCLs are in the locations listed in subsection (d) (2):

(d) ACREAGE AND LOCATION LIMITATIONS

Treatments of vegetation in linear fuel breaks covered by the categorical exclusion established under subsection (b)—

- (1) may not contain treatment units in excess of 3,000 acres;
- (2) shall be located primarily in—
 - (A) the wildland-urban interface or a public drinking water source area;
 - (B) if located outside the wildland-urban interface or a public drinking water source area, an area within Condition Class 2 or 3 in Fire Regime Group I, II, or III that contains very high wildfire hazard potential; or
 - (C) an insect or disease area designated by the Secretary concerned as of November 15, 2021; and
- (3) shall consider the best available scientific information.

All of these location requirements must be analyzed as a part of a clear and complete scientific analysis of the impacts of the 56,620 acres of PCL clearing.

PCL Locations

Page 24 of the EA states that "The PCL selection process was informed by prioritizing treatments near adjacent forest communities and important infrastructure (buildings, power lines, hydro power facilities, communication sites) and along strategic road systems located in the interior of the GPNF." The Environmental Document must identify and map the locations of communities and high value infrastructure and assets which are intended to be protected by PCLs. In addition, a cursory review of the GPNF map shows that those PCLs would be a fraction of the proposed project, unless every road on the NF was declared "strategic". If using this approach, the definition of "strategic road system" must be defined and mapped.

Cutting trees over 20-inch DBH

Proposal is inconsistent with REO Memo 694, regarding trees over 20" dbh

The Forest Service must comply with all the terms and provisions of REO Memo 694, dated July 9, 1996, regarding cutting of trees over 20" DBH. REO Memo 694, quoted further below, does not include these suggested actions described on page 33 of the Draft EA:

Depending on the diameter distribution and growth of some stands, for thinning to be effective in accelerating the development of large diameter living trees and a multiple canopy layer, more than an incidental cutting and removal of >20" DBH trees may need to occur. Should this be needed, a **project-level consistency review by the Regional Ecosystem Office would be conducted** and would be fully disclosed when **plantation stands are scoped for public comment**. [emphasis added]

REO Memo 694 provides explicitly that the Stand Attributes, on page 4 of the Memo (REO review exemption criteria), must be met together with all other conditions of the Memo:

2. West of the Cascades outside of the Oregon and California Klamath Provinces, the basal-area-weighted average age of the stand is less than 80 years. Individual trees exceeding 80 years in those provinces, or exceeding 20-inches dbh in **any** province, shall not be harvested except for the purpose of creating openings, providing other habitat structure such as downed logs, elimination of a hazard from a standing danger tree, or cutting minimal yarding corridors. Where older trees or trees larger than 20-inches dbh are cut, **they will be left in place to contribute toward meeting the overall CWD objective**. Thinning will be from below, except in individual circumstances where specific species retention objectives have a higher priority. Cutting older trees or trees exceeding 20-inches dbh for **any** purpose **will be the exception, not the rule**. [emphasis added]

The Environmental Document must be modified to clarify the restrictions on cutting any trees greater than 20-inches dbh through this project.

Watersheds

The proposed project does not comply with the Aquatic Conservation Strategy of the Northwest Forest Plan

Pages 45 and 46 of the Draft EA discuss the condition of watersheds in the Project Area.

“The **baseline conditions** were rated as functioning properly (FP), functioning at-risk (FR), or not properly functioning (NPF). Currently, within the WCF, 62 out of 110 subwatersheds are Functioning Properly, 48 out of 110 subwatersheds are functioning at-risk, and no subwatersheds are not properly functioning.” (Page 45)

“In general, **road densities** are lower on federal lands than on non-federal lands, however, 104 of 110 subwatersheds are rated either NFP or FR for road density and 39 subwatersheds are NPF or FR for proximity to streams.” (Page 46)

We request that:

- the Environmental Document identify the subwatersheds that need to be modified to function properly, including road maintenance and No-Harvest buffers;
- the at-risk subwatersheds should be specifically identified in a Priority List developed for the entire Forest (see following paragraph); and
- at-risk subwatersheds be specifically identified in Monitoring and Compliance reports prepared annually for this project (see Monitoring section, above).

In addition, we ask that the GP provide a forest-wide watershed review that emulates the review performed in the Mt Baker-Snoqualmie National Forest (MBS). MBS recently released the results of this forest-wide watershed review with which they are prioritizing watersheds for restoration.¹

- We request that the Gifford Pinchot follow the model presented by the MBS and prepare a Watershed Management Strategy prior to undertaking this massive effort.
- We believe this project should be divided into separate projects with planning areas that correspond to the 5th level watershed limits within the Forest.
- The PCL portion of the project should be a stand-alone project.
- The extent of this project – or projects – demands further documentation of the need, purpose, and rationale beyond the few references listed.

¹ The MBS results were presented in their Watershed Management Strategy. Their watershed review covered 1.7 million acres of Forest Service land, and they have broken this area into 21 separate watershed projects, spanning a total of 21 years of planning. In contrast, this project in GPNF proposes to cover all 1.3 million acres of Forest Service Land within one project.

- Please ensure that all thinning and road-building actions proposed by this project are consistent with all aspects of the NWFP's Aquatic Conservation Strategy (ACS).
- There are both Key 1 and Key 2 Watersheds within the project area, each of which will require current Watershed Analyses be developed per the requirements of the NWFP.
- Ensure that the proposed actions do not adversely affect threatened or endangered fish stocks in GPNF. (Surveys for threatened and endangered fish in the Tier 1 Key Watersheds must be completed prior to Final Decision.)
- Identify and map Riparian Reserve boundaries in all LUAs, and follow the buffer requirements per the NWFP's Standards and Guidelines.
- Please provide engineering studies of soils and slopes of each watershed, identifying historical mass wasting/slide areas, and instabilities that could be impacted by timber activities, including erosion.

Roads

Any thinning project along an existing road should trigger an assessment of decommissioning that road once the thinning is completed, to improve water quality and wildlife connectivity.

In addition to the impacts of roadways noted above, the Forest Service should take this opportunity to use this project to identify roads that would be appropriate for closure or decommissioning. Roadways are the primary cause of sediment pollution in creeks, streams and rivers, and the Forest Service does not have (nor will they have in the foreseeable future) adequate funding to manage and maintain their existing roadways. Closure of unnecessary roads is the only sustainable management solution.

To this end, if no additional vegetation projects are identified in an annual project area, then an **Entry Plan** for all the stands in the project area should be identified during the annual Implementation Process. This annual review process can identify those roadways that are only accessing LSR stands nearing 80 years of age, at which point the NWFP precludes any further entries. For example, if the stands that are accessed during a particular year are 60+ years old, and if thinning treatments are carried out on those stands, it can be reasonably assumed that no further entries will be made and that the 80-year restriction would prevent any future entries. Therefore, any roads associated with those stands should be planned for decommissioning as part of this project. Younger stands might need additional entries in the future to perform treatments. We request the Forest Service should use the Environmental Document to plan for decommissioning roads that only access stands aged greater than 60 years old.

As this project proceeds, we would request that in addition to these reductions, any other opportunities that might be presented to further decommission and obliterate existing roads be undertaken. For example, roads that are currently in ML1-ML3 but that only

access stands 60+ years old should be considered for total decommissioning as there should be no further access required to these stands once they reach 80 years of age.

Temporary roads constructed for this project must be obliterated after use. This obliteration should be full and complete, and should not just rely on road closure and gating in order to reduce the opportunity for unauthorized use and access.

Wild and Scenic Rivers, and ViewSheds

Impacts to potential W&S Rivers are inconsistent with the Wild and Scenic Rivers Act, and must be minimized.

The Draft EA acknowledges that impacts along Wild and Scenic Rivers would be clearly detectable. See Page 86:

In this case, **impacts would be clearly detectable to visitors during active implementation** (e.g. equipment accessing the site, tree felling, tree removal, or smoke from pile burning or underburning) **but are not expected to have an overall adverse effect on the rivers' outstandingly remarkable values.** There would be limited direct effects on scenic values related to the presence of crews working and equipment operating in river corridor areas, as well as short term (up to 3 years post implementation) **effects to the visual condition of stands.** In the long term, scenic values would likely be enhanced as thinning would improve scenic quality since it reduces stand density and stand health would be accelerated. [emphasis added]

In addition, the Draft EA acknowledges that the FS conducted visual surveys and photographic inventories:

To support the effects analysis, a multi-day forest-wide **visual survey** and **photographic inventory** was conducted as part of the environmental review process. The survey documented a variety of the proposed plantation stands and potential control line (PCL) roads in areas with **higher VQOs.** Additionally, the existing visual condition of these areas was assessed to help determine the variety class of the proposed treatment areas, as well as analyze the potential effects of proposed treatments. **Further, to assess the visibility of proposed treatments, a geographic information system viewshed analysis using bare-earth digital elevation model raster data and light detection and ranging derived canopy height data were used to determine potentially viewable areas based on identified key observation points.** [emphasis added]

We request that the FS include in the Environmental Document copies of the photographic inventory and the GIS viewshed analysis, as was done for the North Fork Nooksack project along the Nooksack River in the MBS. The Public needs to be able to visually see the potential impacts, of the PCLs on both the Wild and Scenic Rivers and on the “eleven of the identified PCL roads are selected scenic travel routes, which are higher concern level roads

identified for their opportunities to view near-natural scenery from a vehicle.” (page 91 of the Draft EA)

Economic Impact; Sustainable flow of timber to local communities

The Draft EA states on page 5 and on page 10 that one of its purposes is to provide a sustainable flow of timber to local communities. Yet, the Draft EA does not mention how much timber volume would be cut, or terms of sale(s). We request that the following information be provided in the Environmental Document:

- What log volume in million board feet will be cut annually and over what period of time?
- Please clarify plans for sale of downed timber. Who are the prospective buyers?
- Is all this work in addition to other timber sales across GPNF? We ask that the Environmental Document address how the total acreage of thinning in this proposed project fits into the annual board foot totals for the entire GPNF, as those board feet and/or acres should be aggregated for the cumulative concurrent total. See page 34 of the Draft EA.
- The EIS must describe the following economic effects produced by this timber:
 - changes in timber supply of the adjacent SW Washington Counties produced by this sale over the full period of time the sale is being implemented,
 - impacts of the direct effects from this proposed timber sale in numeric terms including numbers of jobs in each timber sector (forestry, logging, wood products manufacturing, paper manufacturing) and the personal income produced in each of the noted sectors, and
 - the share of total employment and total personal income in the relevant SW Washington Counties that are produced by this timber sale.²

We expect that the Environmental Document will provide a detailed discussion of the impacts of timber sales on the total SW Washington timber supply and how such sales will affect the total economy of the subregion.

² Our research shows that timber sectors in seven counties of SW Washington supported about 3% of the total wage and salary jobs in this area in 2022. Furthermore, overall growth in this subregion added over 73,000 new jobs in non-timber sectors since 2001, while the timber sector contracted. Since the GPNF timber program supported just 4% of the subregion’s timber supply (measured by volume) in 2022, it would appear that the potential effects of this proposed sale would be small at best from an economic perspective.

Date at Which Age of Stands is Determined

Page 22 of the EA states:

Proposed treatments for plantation thinning units would include variable density thinning of **previously regenerated stands** less than 80 years old **at time of award** of a timber sale or stewardship contract. [emphasis added]

However, the 80 year age determination should be made **as of date of cutting**, particularly since timber sale contracts and stewardship contracts can have multi-year terms, and thus not get into a stand to cut until years after the stands have aged past 80 years of age.

We request that the Environmental Document include maps to locate all forested areas by relevant stand ages for all LUAs, with an emphasis on stand age ranges (a) less than 80 years old and (b) over 80 years of age.

Protect Naturally Regenerated Stands

Naturally occurring regenerating stands must be excluded from the proposed cutting.

Page 22 as quoted above: We request that the Environmental Document clarifies that commercial thinning is only in replanted harvested plantations, and **does not include naturally regenerated stands** which grew in disturbance areas caused by fire, or windthrow or other natural disturbances such as landslides. See also page 5, top of page 8 and page 21, 43 of the Draft EA. Naturally regenerated stands, even if surrounded by replanted plantations should not be cut.

Dispersed Recreation

Proposed action will increase off road recreational uses and increase risk of human started fires.

According to a recent report from the National Park Service, “Nearly 85 percent of wildland fires in the United States are caused by humans. Human-caused fires result from campfires left unattended, the burning of debris, equipment use and malfunctions, negligently discarded cigarettes, and intentional acts of arson” (<https://www.nps.gov/articles/wildfire-causes-and-evaluation.htm>). Clearly, managing the National Forests to mitigate the dangers of wildland fires should start with the reduction of fire starts due to human activity. Every project undertaken by the Forest Service should include strategies to reduce the potential for fire starts, particularly this project that is designed to make the Forest less vulnerable to fires.

This project has the potential to increase the risk of fire starts due to human usage in a number of ways. Thinning operations will open and “improve” current roadways, making them more navigable for the public to access more areas of the Forest for dispersed camping, motorized vehicle usage (including ATVs), hunting, shooting ranges, etc. PCLs will

clear underbrush and small trees directly adjacent to the roadways, making access easier for subsequent dispersed camping, hunting access, and off-road vehicle usage, particularly in those areas where existing camping, hunting, and recreation is already popular. Any type of dispersed recreation usage (whether legal or not) must be managed and controlled by the Forest Service in order to reduce the risk of wildland fire.

Reduced funding and staffing levels in the Forest Service will make management of these activities harder to control in subsequent years. The Forest Service should consider strict fire management controls related to dispersed recreation. For example, removal of any fire rings at “established” dispersed camping sites along with complete bans on fires at dispersed camping sites would reduce the chance of fire starts due to unattended campfires.

As climate change continues to alter the fire regimes of the Forest, increasing the risk of catastrophic fire events, such behavioral changes must be made in order to protect the Forest resource. It is not reasonable to expect that Forest management through thinning operations will be the lone solution to reduce fire danger. Stopping fires before they start is the most effective, rational, and reasonable method to preserve the National Forests.

Wildlife habitat and connectivity

The Project has unacceptable impacts on wildlife connectivity.

The impact of a 1,000 foot wide clear zone will have substantial impact on wildlife, especially those that are dependent on late-successional forests – some of which are listed under the ESA. Roads have already degraded and split habitat areas and had high impacts on dispersal of Late Successional Old Growth species. This project will exacerbate that situation. Additionally, please address additional impacts to wildlife and connectivity due to access to these areas for winter recreation.

Mt. St. Helens National Volcanic Monument (NVM)

None of this proposal should occur within the Mt. St. Helens National Volcanic Monument

- No thinning
- No roads – not even temporary.
- All activity within the NVM must be designed to protect natural ecological and geological processes.
- Show boundaries of NVM on all maps that include parts of the NVM. It is unacceptable that the GPNF would ignore this congressionally designated conservation area by leaving the boundaries off of maps in the subject Draft EA.

Additional Comments

- Page 95: the list of State Agencies consulted does not include Washington Department of Fish & Wildlife (WDFW). The FS should have discussions with WDFW

regarding fish and other wildlife, as Washington has listed the Northern Spotted Owl as Endangered, rather than merely Threatened as done by USFWS. Washington Department of Natural Resources does not deal with Threatened & Endangered Species.

- We request that all annual and other periodic implementation consistency reviews under WWRCZ for yearly plantation thinning and PCL treatment units be made available publicly both as part of the Public Participation Process as well as permanently either on the project website, or on the GPNF website.
- Maps showing Land Use Allocations and Management Area Categories (GPNF as amended by NW FP) should be included in the project documents. Without mapping, it is not possible to identify the acreages shown on Tables 6 & 7 (EA, pp 21-22).
- The Forest Service's "Aquatic Report" (March 2025 "Fisheries_Hydrology Report_GPNF_04112025.pdf") fails to provide any base-line fishery data, preferring instead to the use of vague quality descriptions of habitat and abundance. We request that the Forest Service present baseline quantitative population numbers on each fish species, as well as any trends over the last 30 years since the last Land and Resource Management Plan, as part of an EIS.
- We request that an EIS be prepared that includes a quantitative and qualitative analysis of pesticide/herbicide use proposed by the Forest Service that includes a listing of past pesticide/herbicide used annually over the past 30 years since the last LRMP and the projected use over the future lifespan of this project.
- Based on the spatial and temporal scale of the project, combined with the forgoing comments presented herein, we reiterate the need for the Forest to prepare an EIS for this project to study the comprehensive impacts to the ecosystems due to the mileage, acreage, and duration of this project.

We appreciate the opportunity to comment on this massive project. The scale of the project, the sensitivity of the lands and waters in the project area, and the duration of the plan require a close analysis of any proposed actions, with plenty of input opportunities from interested parties. Within the draft EA the FS has failed to acknowledge and address the immense scale and impact of the proposal and has exceeded regulatory requirements in using an EA to approve a huge amount of forest disturbing work. It is not acceptable to present this one-time quick review to approve a massive amount of logging over half a century, well beyond the timeframe of an already expired Land and Resource Management Plan. This is ill-advised and illegal both procedurally and substantively.

We hope that our comments and concerns will provide an opportunity for discussion and improvement of this plan going forward. Please provide responses to all of our comments as presented above. Also, please keep us on the mailing list and informed of future

developments, including the annual Public Review process outlined in the Plantation Thin Implementation Process.

Sincerely,

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