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10600 N.E. 51st Circle
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Via website: <https://cara.fs2c.usda.gov/Public/CommentInput?Project=65884>

RE: Comments on Forest Wide Thinning & Potential Control Line Treatments Project Environmental Assessment

Dear Mr. Chapman:

Thank you for the opportunity to comment on the Forest Wide Thinning & Potential Control Line Treatments Project Environmental Assessment (EA). 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 generally supports the treatment of plantation stands under 80 years of age. However, we have a few concerns and questions regarding this draft proposal that we would like to see addressed in the final EA, and we will address them below by topic.

I. Potential Cumulative Impacts to Waterways

We raised this concern in our scoping comments and have not seen this issue adequately addressed by the EA. Therefore, we have included this issue again here. Because it is unknown where these 300 acres of regeneration harvest will occur each year, we would like the Forest to consider cumulative impacts from placing multiple treatments, particularly regeneration treatments, in the same drainage or near the same stream. Allowing 300 acres of regeneration in a concentrated area could have negative impacts on waterways like increased stream temperature¹, peak flow increases that adversely affect stream morphology², and reduced

¹ Michael M. Pollock et al., *Stream Temperature Relationships to Forest Harvest in Western Washington*, 45 J. AM. WATER RESOURCES ASS'N 141 - 156 (2009).

² Francois Guillemette et al., *Rainfall generated stormflow response to clearcutting a boreal forest: peak flow comparison with 50 world-wide basin studies*, 302 J. OF HYDROLOGY 137-153 (2005).

amphibian and fish densities.³ Which is of particular concern in streams that are already temperature-limited, support ESA-listed fish, or have other characteristics that increase their sensitivity to disturbance. To limit the potential cumulative impacts from concentrated regeneration harvest, CFC would like to see the total amount of regeneration allowed per year decreased and other protective measures included in the plans to ensure any particular waterway(s) do not bear the burden of most or all of the allowable acres of regeneration in a year. CFC requests the Forest include more direct measures and Project Design Criteria (PDCs) in the final EA to ensure a mosaic is created across the landscape and no one area or subwatershed is targeted for either the full amount or a substantial percentage of the regeneration harvest allowed per year.

CFC acknowledges that some protective measures are within the EA and we are fully supportive of these, i.e. prohibiting regeneration harvest in LSRs and RRs. CFC believes any regeneration in these land use types would be against the purpose and management direction for LSRs and RRs. We support the Forest Service in making this restriction very clear. Although these PDC's provide some guardrails on regeneration harvest, CFC feels these protections alone do not address the point made in this section. In addition to adding limits on the amount of regeneration harvest allowed in a concentrated area, CFC requests that the restriction noted in the Wildlife Report, restricting the size of the regeneration patches to less than 5 acres, be included as a PDC.⁴ This restriction is not clear in the EA and current PDC table. All of the restrictions discussed in this section are needed as mitigation or else this project may have significant impacts on the environment, particularly aquatic ecosystems, and would therefore require the development of an Environmental Impact Statement.⁵

II. Enforcement of Project Design Criteria

CFC is concerned with the Forest's ability to adequately enforce all of the PDCs in the EA given staffing and funding cuts. The PDCs are critical for ensuring ESA compliance, protecting sensitive species and habitats, and for minimizing the spread of invasive species. CFC is generally supportive of the PDCs listed in the PDC table⁶, but is worried about the Forest's capacity to ensure contractors are in compliance with them. Several PDCs, especially those related to what to do when individuals of certain species are seen, or dens are found, are particularly difficult to enforce and rely on self-reporting from the contractors.⁷ Without a

³ Deanna H. Olson, & Adrian Ares, *Riparian buffer effects on headwater-stream vertebrates and habitats five years after a second upland-forest thinning in western Oregon, USA*, 509 FOREST ECOLOGY & MGMT 120067 (2022).

⁴ See "300 acres annually of regeneration units limited to < 5 acres in size." ADAM RICH, BIOLOGICAL EVALUATION & WILDLIFE REPORT: FOREST-WIDE PLANTATION THINNING & PCL TREATMENTS PROJECT, 23 (Feb. 2025).

⁵ 36 C.F.R. § 220.7(b)(3)(i), (iii) (2025).

⁶ See Section VII below for suggested edits to particular PDCs.

⁷ Examples of important PDC's requiring self-reporting and/or Forest Service oversight at the harvest and hauling locations: PDC 30 ("If any individual spotted owl or marbled murrelet (including their young or eggs) is observed in the project area during project operations, a Forest Service Wildlife biologist will be notified. . ."); PDC 31 ("If wolverines or sign (tracks, scat, kill site, etc.) are seen frequently in an area, operations would stop, and the observances immediately reported to a Forest Service wildlife biologist . . ."); PDC 51 ("If a den is discovered during implementation of project activities, the one-mile seasonal restriction will be implemented . . ."); PDC 78

noticeable oversight presence from the Forest Service, CFC is concerned many PDCs will be ignored. Therefore, CFC requests the Forest make contract monitoring and oversight a high priority.

III. Public Input Process Pre-Implementation

As we stated in our scoping comments, a pre-implementation site-specific public involvement process is critical to the success of this project. Although the EA includes more detail than the scoping documents, the EA identifies the public involvement process as a “proposal” instead of a requirement. Given the large number of acres covered by this proposal, CFC thinks it is vital to have another required level of public involvement around the selected stands every year to help identify any site-specific concerns or issues. Our understanding is having a public comment period around the selected stands every year is the Forest’s current intent.⁸ However, we’d like to see that process formally included as a requirement of implementation in the final EA to ensure that the engagement process post-decision is not abandoned.

IV. Analysis of Impacts from Roadways

CFC has several concerns regarding the impacts from roadways and whether the EA has adequately analyzed their possible impacts and whether the mitigation measures are sufficient. With respect to temporary roads, we have questions about the length of time the temporary roads will be allowed to remain on the landscape, and whether that full timeline was accounted for when analyzing possible impacts. For example, the EA states “[t]emporary roads for this project are intended to provide as short-term access to a specific area for wood product removal and/or follow-up treatments, such as prescribed burning.”⁹ Does this mean that the temporary roads will remain on the landscape until after maintenance treatments occur? The EA mentioned that these follow-up treatments could be 10-15 years after harvest. Does that mean the temporary roads would be on the landscape for 10-15 years after harvest? If so, was that longer time frame analyzed with respect to impacts?

Additionally, CFC recognizes that this EA is programmatic and that more analysis will be done at the site-specific level. However, the roads analysis in this EA was very cursory. Given the significant impacts roads can have on the landscape, CFC requests the Forest Service pay particular attention to road impacts, placement, and amount when doing pre-implementation

(“Soil disturbance will be rectified before operations continue if harvesting operations cause soil ruts greater than six inches deep for ten feet or longer . . .”); PDC 82 (“Timber hauling operations will be stopped immediately if road use is causing deep rutting of the road surface. . . .”) PROJECT DESIGN CRITERIA - GIFFORD PINCHOT FOREST WIDE PLANTATION THINNING AND POTENTIAL CONTROL LINE TREATMENTS PROJECT (Apr. 2025).

⁸ Public involvement in later subsequently tiered NEPA analysis would also be in line with CEQ’s 2014 guidance on the effective use of programmatic NEPA reviews. See MEMORANDUM FOR HEADS OF FEDERAL DEPARTMENTS AND AGENCIES FROM MICHAEL BOOTS, COUNCIL ON ENVIRONMENTAL QUALITY, EFFECTIVE USE OF PROGRAMMATIC NEPA REVIEWS, 40 (Dec. 18, 2014).

⁹ U.S. FOREST SERVICE, GIFFORD PINCHOT NATIONAL FOREST, FOREST WIDE PLANTATION THINNING & POTENTIAL CONTROL LINE TREATMENTS PROJECT, DRAFT ENVIRONMENTAL ASSESSMENT, 80 (Apr. 2025).

work, particularly around site-specific impacts to aquatic ecosystems and the possible spread of invasive species. Site-specific public outreach around particular stands each year should also include planned road work, including expected placement of temporary roads, to allow for meaningful public engagement related to roads.

V. Cumulative Effects Analysis

It is not clear whether the cumulative effects analysis took into account all relevant past and reasonably foreseeable future actions. The list in Appendix B at times seems focused on the Little White Salmon watershed and the Yellowjacket watershed instead of the whole Forest. For example, action labeled as “timber sales” states “[s]ome managed stands in the Little White Salmon watershed were thinned, followed by planting.” The “road decommissioning” action states “[a] total of 11.6 miles of road were decommissioned in the watershed.” These are just two of several examples of “actions” in the Appendix B - Cumulative Effects Analysis Projects that seem specific to one watershed, likely the Little White Salmon, instead of including projects for the whole Gifford Pinchot National Forest. Additionally, the Wildlife Report only mentioned the Little White Salmon Timber sale as the only other “large vegetation management” happening on the Forest.¹⁰ What about other sales that are still being implemented like Yellowjacket? Without a more accurate list and description of relevant actions Forest wide, it is difficult to determine whether or not the EA and specialist reports adequately considered cumulative impacts as required by NEPA.¹¹

VI. Analysis of Impacts to Wildlife, Plants, Fisheries, & Waterways

There are several discrepancies between the specialist reports and the EA, making it difficult to determine whether or not impacts to wildlife, plants, fisheries and waterways were properly analyzed. First, the Wildlife Report, Botany Report, and Fisheries & Hydrology Report state that thinning will occur on 3,000 acres a year, but the EA states thinning will occur on 3,600 acres a year.¹² Was the analysis regarding impacts to these resources updated to look at the impacts from an additional 600 acres per year? Second, the Wildlife Report, when discussing PCLs states “[t]he PCL treatment rate would largely be determined by available funding. Optimistic budget projections put the annual average estimate at 4,645 acres which equates to < 8% annually of the total 56,875 PCL acres and less than 1/10 of one percent of the action area.”¹³ However, the EA

¹⁰ ADAM RICH, BIOLOGICAL EVALUATION & WILDLIFE REPORT: FOREST-WIDE PLANTATION THINNING & PCL TREATMENTS PROJECT, 25 (Feb. 2025).

¹¹ 36 C.F.R. § 220.4(f) (2025).

¹² *Id.* at 18 (“This treatment would take place on up to 3,000 acres per year.”); MEGAN CHAPMAN, GIFFORD PINCHOT NATIONAL FOREST: FOREST WIDE THINNING & POTENTIAL CONTROL LINE TREATMENTS PROJECT ENVIRONMENTAL ASSESSMENT, BIOLOGICAL EVALUATION, BOTANY, 5 (Feb. 2025) (“Plantation Thinning, the project proposes to complete the following activities annually: Identifying up to 3,000 acres of plantation stands to be treated annually.”) J.D. JONES, FOREST WIDE PLANTATION THINNING & POTENTIAL CONTROL LINE TREATMENTS PROJECT, AQUATICS REPORT, 4 (March 2025) (“Annual implementation activities would include: Identifying up to 3,000 acres of plantation stands to be treated annually . . .”).

¹³ ADAM RICH, BIOLOGICAL EVALUATION & WILDLIFE REPORT: FOREST-WIDE PLANTATION THINNING & PCL TREATMENTS PROJECT, 23 (Feb. 2025).

limits PCL treatments to 1,000 acres per year of hand thinning, 1,000 acres per year of prescribed fire, and 500 acres per year of pile burning.¹⁴ That amount does not equal 4,645 acres. Where did that number come from? Which number was used when analyzing the impacts to wildlife? Third, as mentioned above in the cumulative impacts section, the Wildlife Report seems to have excluded in its analysis some management actions on the Forest like implementation of older sales like Yellowjacket. Fourth, the Wildlife Report notes that regeneration patches will be limited to less than 5 acres in size.¹⁵ However, the EA and the PDCs do not make this restriction clear.

CFC requests that the analysis looking at impacts to wildlife, plants, fisheries, and waterways be updated to address all discrepancies between the EA and the reports. Any limitations that any specialist's analysis used, like restricting the amount of harvest or the size of regeneration patches, must be included as a mandatory PDC - or else the EA and accompanying documents did not accurately analyze direct, indirect, and cumulative impacts of the proposed action as required by NEPA.¹⁶

VII. Specific Project Design Criteria Concerns & Questions

CFC has several questions and suggested edits to particular Project Design Criteria. Those questions and suggested edits are included in this section:

- **PDC 13:** While CFC supports the use of gaps as a tool for variable density thinning, we are not supportive of 5-acre gaps, which resemble small clearcuts rather than ecologically beneficial canopy gaps. Aukema and Carey (2008) and Carey et al. (1999), both cited in the EA, recommend gaps between 0.1 and 0.5 ha (0.25–1.2 acres) to promote understory and structural diversity. Gaps larger than 1,000 m² can create altered microclimates and conditions more typical of stand-replacing disturbances¹⁷, and exceed the 1–2 range optimal for Douglas-fir regeneration.¹⁸ We recommend reducing proposed gap sizes to better align with these ecological goals by creating a mosaic of smaller gaps.
- **PDC 17:** This PDC has a requirement to “retain a relative stand density of 35%-40%” within Riparian Reserves. It is not clear whether that density includes both the outer and inner Riparian Reserve. CFC requests that the PDC be updated to make clear which zone(s) within the Riparian Reserves this relative density applies to.
- **PDC 18 & 36:** CFC is supportive of these two PDCs that prioritize using woody debris for riparian and aquatic habitat improvements.

¹⁴ U.S. FOREST SERVICE, GIFFORD PINCHOT NATIONAL FOREST, FOREST WIDE PLANTATION THINNING & POTENTIAL CONTROL LINE TREATMENTS PROJECT, DRAFT ENVIRONMENTAL ASSESSMENT, 20 (Apr. 2025).

¹⁵ ADAM RICH, BIOLOGICAL EVALUATION & WILDLIFE REPORT: FOREST-WIDE PLANTATION THINNING & PCL TREATMENTS PROJECT, 23 (Feb. 2025).

¹⁶ 36 C.F.R. § 220.7(b)(3) (2025).

¹⁷ Sarah A. Schliemann & James G. Bockheim, *Methods for studying treefall gaps: A review*, 261 FOREST ECOLOGY & MGMT 1143–1151 (2011).

¹⁸ D.C. Malcom, W.L. Mason, & G.C. Clarke, *The transformation of conifer forests in Britain- regeneration, gap size and silvicultural systems*, 151 FOREST ECOLOGY & MGMT 7–23 (2001).

- PDC 23: This PDC reads as though it is limited to the White Salmon River/Cascade Creek instead of all proposed/eligible Wild & Scenic waterways. The language in the PDC should be edited to more clearly cover all proposed and eligible Wild & Scenic Rivers.
- PDC 27: The language in this PDC does not protect all “special habitats such as caves, mineral licks, and talus slopes” and instead only protects those that are determined “biologically significant.” CFC requests instead that all of these types of habitats be protected.
- PDC 33: CFC requests this PDC specific to regeneration harvest be updated to include language about ensuring all 300 acres of regeneration are not concentrated over a relatively small area to avoid cumulative effects.
- PDC 41: In (B), there is an exception about constructing temporary roads in suitable nesting habitat when the “reconstruction of an existing road prism [is] necessary to access the treatment unit.” It is not clear from the language of this PDC who determines when it's necessary. CFC requests that this PDC be updated with language to require someone at the Forest Service to determine whether or not it's necessary, rather than the contractor.
- PDC 42: CFC is supportive of this PDC preventing regeneration harvest within 100 feet of suitable nesting habitat.
- PDC 43-47, 49-50: All of these PDCs mention “USFWS-accepted surveys” but the language is not consistent across PDCs. For example, in PDC 43, does “current surveys” refer to surveys that are currently being conducted or planned? Or does this mean to say any new surveys conducted during the life of the EA? CFC requests that all of these PDCs be adjusted to reflect the timing of surveys included in PDC 46: “USFWS-accepted protocol survey results available in the year of the harvest and in the two years preceding the year of the harvest.” Making this update will ensure consistency around how surveys may be used and prevent confusion in implementation.
- PDC 55: This PDC mentions that “effective access controls” will be used when decommissioning temporary roads. This language is quite vague. CFC requests more detail be added to this PDC to ensure contracts and contractors are meeting the intent of this PDC.
- PDC 58: The last sentence in PDC 58 says “necessary to meet” and then cuts off. Is some of this PDC missing?
- PDC 64: It appears that this PDC requires all non-system roads to be decompacted.¹⁹ If so, CFC is supportive of this. CFC believes it is important to maintain the requirement in the final PDC that the “end result of the decompaction will be an uneven, roughened surface without linear gouges or furrows.” Having concrete and objective standards as part of the PDC helps ensure the PDC is enforceable and more easily interpreted by those implementing the project.

¹⁹ The Transportation Report seems to contradict this stating “[d]ecommissioning will be accomplished with one or more of the five levels of treatments described above.” MIKE LARMAN, FOREST WIDE PLANTATION THIN AND POTENTIAL CONTROL LINE PROJECT, TRANSPORTATION REPORT, 11 (Jan. 2025). This seems to suggest that blocking the entrance would count as a decommission. CFC requested the Forest Service clear up this discrepancy in favor of PDC 64, and require all non system roads be decompacted.

- PDC 84: Includes language about treating high-priority invasive populations to the “maximum extent practicable.” Although CFC acknowledges the staffing and funding issues that the Forest Service is experiencing, minimizing the spread of invasives is critically important. As the agency knows, catching invasive species spread early is much more effective and less costly than trying to treat a widely established infestation.²⁰
- PDC 86, 87, & 89: CFC is supportive of the language in these PDCs, particularly the requirement to have an inspection or approval from the Forest Service before continuing on with work.
- PDC 94: This PDC states to the “maximum extent practicable,” avoid staging within or immediately adjacent to invasive infestations. CFC requests this PDC be changed to require avoiding staging altogether within and immediately adjacent to invasive infestations. If staging cannot be done anywhere else, then there should either 1) be full treatment of the infestation in a manner that enables the timber harvest activities to proceed without spreading invasive plants into the work areas or 2) the Forest Service Botanist should have to grant approval to stage in an infested area.

Edits to the PDCs listed here will help ensure the actions contemplated in the EA are truly mitigating potential harms of the proposed action. CFC requests all of these edits be incorporated into the final EA.

VIII. Miscellaneous

In this section, CFC will address miscellaneous questions, concerns, and/or areas of support that are not addressed in any of the above sections:

- Fuels Report: The EA mentions a Fuels Report, but it was not included in the project files available to the public. Please make the Fuels Report publicly available. For example, from just the EA, it is unclear what fire conditions were used to derive the results in Figures 12 and 13. CFC is generally unable to provide meaningful feedback on the fire-related components of the EA without the fuels report; there is just not enough information and explanation about the modelling or assumptions made to allow for detailed review at this time.
- Rock Pit Conflicting Language: It is not clear from the EA whether or not rock pits will be developed as part of this proposal. On page 79 of the EA states, “[r]ock pit development would stay within the existing footprint and any timing restrictions would be followed. . . . No new rock pits would be developed at this time.” CFC requests that the Forest Service clear up whether or not new rock pits would be allowed under this EA or whether they would require additional NEPA analysis.

²⁰ “Early detection of populations of invasive species is critical before they become larger and spread. The most effective action against invasive plants is early intervention; otherwise populations increase in number and size, becoming more difficult and costly to control.” MEGAN CHAPMAN, GIFFORD PINCHOT NATIONAL FOREST: FOREST WIDE THINNING & POTENTIAL CONTROL LINE TREATMENTS PROJECT ENVIRONMENTAL ASSESSMENT, BIOLOGICAL EVALUATION, BOTANY, 30 (Feb. 2025).

- Post-Disturbance Monitoring: CFC is particularly concerned about the spread of invasive plants from ground-disturbing activities. As the Botany Report notes, “[p]ost-disturbance monitoring would allow early detection of new infestations or existing infestations that may be expanding into newly disturbed sites.”²¹ CFC requests that post-disturbance monitoring be a firm commitment and priority for the agency when implementing this project.

IX. Conclusion

In conclusion, CFC would like to see 1) additional guardrails to prevent cumulative impacts from regeneration harvest, 2) a commitment by the Forest Service to provide meaningful oversight of contractors to ensure PDCs are complied with, and 3) have all the specific PDC suggested edits, analysis issues, and discrepancies identified in this letter addressed.

We look forward to working with the agency and other partners to finalize and implement 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, cursive script.

Ashley Short
Policy Manager
Cascade Forest Conservancy
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²¹ *Id.*