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submitted via email to www.fs.usda.gov/r06/giffordpinchot/projects/65884

Re: Forest Wide Thinning & Potential Control Line Treatments Draft Environmental Assessment

Dear Ms. Kovarik,

I previously commented on the July 1, 2024 Proposed Action Scoping Brochure for Forest Wide Thinning & Potential Control Line Treatments in the Gifford Pinchot National Forest. These are my comments on the Draft Environmental Assessment (EA).

Need for Environmental Impact Statement

My overarching scoping comment was that a project of this size, scope and assumed time duration absolutely should be analyzed in an environmental impact statement. It now appears that project refinement has scaled back the forest-wide plantation thinning proposal a bit from 200,000 acres to 157,000 and the Potential Control Line (PCL) clearing has been scaled back slightly from 59,000 acres to 57,000 acres.

This still is a huge, mind-boggling landscape scale project with a long time span extending from 40 to 60 years or more for plantation thinning, depending on funding, staffing and environmental conditions. The PCL thinning would last into perpetuity, with initial work taking at least 57 years to complete, depending on funding, staffing capacity, and weather conditions. That would be combined with maintenance required every 5-15 years, depending on the speed of vegetation regrowth.

The proposal for public engagement every year, with a 20 to 30 day public comment period, appears intended to offset the need to prepare an environmental impact statement. There is not any statutory or policy requirement, however, for future Gifford Pinchot National Forest (GPNF) staff to follow through on this proposal so I fear it will be ignored by future forest leadership for reasons of convenience and/or cost.

Separate Environmental Analyses for Thinning and PCL Treatments

As I requested in my scoping comments, forest wide thinning should be separated from PCL Treatments into separate environmental analyses. Plantation thinning would presumably only occur once on any given acre but PCL thinning would occur several times on the same acres over a century. Another way to approach forest wide thinning would be on a 5th level watershed basis to allow the in-depth analysis needed to understand the cumulative direct and indirect effects.

Sufficient Staff to Supervise Contractors

The current down-sizing of Forest Service staff through terminations and reductions-in-force raises serious concerns regarding the ability to ensure compliance with mitigations measures, including for

invasive species prevention, road decommissioning and road reconstruction. For example, Scotch broom invasions in thinned areas will need to be prevented or managed to prevent this highly flammable weed from increasing wildfire risk. I am concerned that without land manager oversight, contractors will be tempted to cut corners.

No Entry in Stands Older Than 80 Years in Late Successional Reserves

Since this environmental assessment has such a long implementation horizon, thank you for specifying on page 20 that “stands less than 80 years-old (at the time of the timber sale or stewardship contract award) [emphasis added] would be thinned from below to a variable density, thereby facilitating the development of late-successional characteristics and advancing the area toward meeting LSR objectives.”

PCL Corridor Width Impacts of Wildlife

Neither the EA nor supporting specialist reports address the impacts of up to 1,000 foot (500 feet on each side of the road) cleared areas on wildlife habitat fragmentation and loss of connectivity for non-federally-listed wildlife species like elk, bear, bobcat, cougar, fisher, marten, squirrels, birds, etc. Roads already affect wildlife, as proven by much research on the ecology of roads and wildlife disturbance. Is there a scientific basis for the designation of 500 feet on each side of the road or is it an arbitrary choice by fire managers?

Connections across the landscape necessary for wildlife survival already have been broken by forest roads. Wildlife require the ability to move from one habitat to another in search of mates, food, shelter, and new homes as habitat, season and weather conditions change. PCLs will widen the road corridor up to 1,000 feet, impacting wildlife that need to cross roads as part of their life cycles, but the potential impacts have not been addressed in this EA. Habitat networks should be identified and mitigations should be designed into the PCL corridors.

Monitoring Needed

Since this is a landscape scale project of such long duration, monitoring, review and adjustment will be necessary to determine success in increasing structural diversity in thinned plantations as well as the impacts of long-term maintenance of PCL corridors. The

Trail Restoration Following Thinning

Many trails are overlain by plantations for part of their length; it was the loss of trails to clearcuts that caused trails to become an issue for the 1990 Forest Plan. I remember writing comments on timber sale environmental assessments in the 1980s objecting to the impacts on hiking trails. Thinning projects should be laid out to minimize visual and physical impacts to trails, and trails (and trailheads) should be restored following project completion.

Restore Road Access to Trailheads; Remove Roads in LSRs

Plantation thinning projects should include restoration of recreation access to trailheads where roads have been closed by landslides, washouts over overgrown vegetation. On the other hand, once thinning projects are completed in LSRs, there will be no further need for the spur roads and they should be decommissioned. How many road miles will be decommissioned in LSRs following the completion of projects?

Relationship to Current Projects

The EA does not describe how this landscape-level project will interact with current projects, such as Yellowjacket on the Cowlitz Valley Ranger District and the Little White Salmon on the Mount Adams Ranger District? Will the plantation thinning occur in addition to the work in those projects?

Using Thinning for Meadow Restoration

Trees have been invading many meadows on the forest, reducing the meadow areas and threatening to shade out sensitive, and some times rare, plant species. In addition to using thinning to maintain and restore huckleberry fields, I am interested in conservation of wetter meadows, such as Wright Meadow and Spencer Meadow, from tree invasion, perhaps through hand removal of trees and prescribed burning in the fall.

Thank you for the opportunity to comment.

Sincerely,

Susan Saul