



May 15, 2025

Via Project Website

Johanna Kovarik, Forest Supervisor
Gifford Pinchot National Forest
987 McClellan Rd
Vancouver, WA 98661

In Reply to: Plantation Thin and Potential Control Line Treatment Project

Dear Ms. Kovarik:

The American Forest Resource Council (AFRC) submits the following comments for the Revised Draft Environmental Assessment (EA) for the proposed Plantation Thin and Potential Control Line Treatment Project.

AFRC represents the forest products industry throughout Oregon, Washington, Idaho, Montana, California, and Nevada. AFRC's members include over 50 forest product businesses and forest landowners. AFRC's mission is to advocate for sustained yield timber harvests on public timberlands throughout the West to enhance forest health and resistance to fire, insects, and disease. We do this by promoting active management to attain productive public forests, protect adjoining private forests, and assure community stability. We work to improve federal and state laws, regulations, policies, and decisions regarding access to and management of public forest lands and the protection of all forest lands. Many of our members have their operations in communities adjacent to the Gifford Pinchot National Forest (GPNF), and the management of these lands ultimately dictates not only the viability of their businesses but also the economic health of the communities themselves. The forest products sector in Washington State continues to provide around 40,000 direct and about 100,000 indirect jobs. Many of these are found in rural communities like those in Cowlitz, Lewis, and Skamania Counties and the surrounding areas. In addition to the wages paid, the taxes and other monetary transactions generated by these businesses and family-wage jobs contribute to the infrastructure and well-being of the local communities. AFRC submits these comments on behalf of its members.

Washington and surrounding states continue to face an issue with a lack of raw materials to meet manufacturing demands for wood products. Several mills have closed in the past few years. Vegetation management projects, both current and future, on the GPNF can help contribute to the wood supply that many mills depend on to continue operating and employing their workforce. The economic activity created through these treatments contributes to the greater community's well-being.

Sustainable commercial timber harvest on the Gifford Pinchot National Forest and neighboring National Forests is critical to our members' near and long-term success. Our members and their contractors and employees rely on the timber output from the GPNF and surrounding lands, including other National Forests. The economic activity created by this work also supports local economies and government services, such as those provided by AFRC members, including Skamania and Lewis Counties. Commercial timber harvesting is critical for the vitality of many rural communities in Washington State.

Additionally, much of the non-commercial and non-timber work proposed in the project will benefit from both economically viable and productive commercial timber projects and healthy and vibrant local economies. Too often, we see 'Purpose and Need' statements where the economic contribution of timber harvest appears to be more of an afterthought or byproduct of the proposed work. However, we would suggest that well-maintained roads supported by timber operations lead to the success of other activities such as huckleberry enhancement, safe and efficient recreational access, and ultimately the ability to accomplish much of the restoration work outlined in these proposals.

Because commercial timber management on National Forest lands provides a substantial economic benefit, we are happy to see the Forest include this benefit in the 'Purpose and Need' statement. However, we always encourage the Forest to raise the priority of and use clearer, affirmative, and stronger language regarding economic contributions in future projects' Purpose and Need statement.

Proposed Action

AFRC generally supports the Proposed Action for this project and believes it will provide the best opportunity for the Forest to meet its intended goals with this proposed project. The sections below cover specific concerns and/or recommendations.

General Comments on the Proposed Action

AFRC would strongly encourage the Forest to develop a strategy to address changed conditions within the planning area. A large-scale proposal such as this provides significant efficiency when proposing and implementing thinning and fuel reduction work across the Forest. However, the timeframe needed to complete this work leaves the potential for various disturbances to occur within the planning area. To prevent unnecessary delays in implementation, should an unforeseen significant disturbance occur, we recommend that the GPNF develop and articulate a strategy to address changed conditions as needed in the future implementation of the Plantation Thin and Potential Control Line Treatment Project.

Plantation Thinning Treatments

We do not support the use of variable-density thinning on Matrix lands. As specified in the EA on page 22, *"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....This thinning method is a restoration tool that can accelerate development of old-growth forest structure in plantations and increase landscape habitat connectivity (Spies et al. 2019)."* While this thinning strategy may be appropriate for stands in the Late Successional Reserves (LSRs), we are concerned about its use on Matrix lands, especially in younger Matrix lands, where a sustainable timber supply can occur.

Thinning prescriptions in plantations on Matrix lands, especially those under 50 years of age, should be focused on spacing and density reduction to foster the growth and resiliency of the stands. Using “skips and gaps” is better suited for treatments in LSRs, where the goal is to create late seral diversity and structure. And we question this as a long-term sustainable practice for Matrix lands. Thinning prescriptions on Matrix lands, regardless of age, focused on developing late seral conditions, likely could hamper the future sustainable supply of wood products from these lands. We want to ensure that all stands, including older stands on Matrix lands, are being managed in a manner that will provide for future regeneration harvests and timber production.

We strongly encourage the forest to re-evaluate the types and scale of proposed treatments/prescriptions on Matrix lands.

For stands proposed for treatment in LSRs, we encourage the Forest to first target stands in the 60 to 80-year-old class. While the EA specifies that those stands under age 80 at the time of “timber sale or stewardship contract” are covered by this analysis, given the limited scale of annual treatments, some LSRs will likely “age out” before the Forest gets to them. If possible, the Forest should state that stands under age 80 in LSRs when the Decision Notice is signed are covered by this analysis and are available for treatment.

Regeneration Harvest

AFRC strongly supports the application of regeneration harvest in this proposal. As mentioned above, the long-term sustainability of timber harvest on National Forest lands, particularly on Matrix lands, in western Washington requires that stands be re-initiated. Regeneration harvest is the primary tool to accomplish this work and ensure ongoing sustainability. The limited acres proposed for regeneration harvest are a small percentage of the overall proposed treatment acres. While likely not enough to ensure future sustainability at a landscape level, it is a start.

We are concerned about the focus areas for regeneration harvest. Focusing on huckleberry enhancement potential may come at a cost to the project (e.g., lower-value timber), and the need for reforestation would limit the effectiveness of the huckleberry enhancement. We believe the initial focus for regeneration harvest should be on stand health and resiliency, thus promoting a long-term sustainable supply of timber from Matrix lands.

Despite the minimal proposal, we applaud the Forest for undertaking this proposed treatment and fully support maintaining the proposed regeneration footprint. We would encourage the Forest not to reduce the acres proposed for regeneration, but to explore expanding the regenerated acres.

Potential Control Lines

We support the development of ‘potential control lines’ (PCLs) in this proposal. Conducting this work ahead of a fire can be more efficient and strategic. While we understand the Forest’s intent on hand-thinning fuels of less than 8 inches dbh and not conducting a commercial activity, this will be costly, and we are concerned that little will be completed. We also worry that limiting the thinning to material under 8 inches may not remove some of the critical ladder fuels in what is essentially a “shaded fuel break.” Additionally, the ongoing maintenance of these PCLs will be a cost center for which the Forest will need to budget. The prescribed fire use

and/or underburning track record is not excellent across the western Washington National Forests. It will be essential to ensure adequate fuels are reduced and maintained in this reduced state for this portion of the project to be successful.

Riparian Reserve Management

AFRC is pleased to see the Forest propose some treatments within the Riparian Reserves. Many streams in the project area were not buffered during the previous harvest operation. Wide “no-cut” buffers can limit the ability to treat the area that would provide the most significant benefit for accelerating desired future conditions for the Riparian Reserves.

Harvest Operations

AFRC is pleased to see the inclusion of tethered logging systems as a timber harvesting method. Providing operators with flexibility in harvesting systems, especially given the current challenge of finding qualified cable systems loggers, is critical to the success of this project.

As the Forest and Ranger Districts move into the implementation phase, we encourage the Forest to engage the purchasing community when planning helicopter logging operations. Due to the costs of operations, potential volume removals, timing restrictions, and more, the risk of creating non-economically viable sales is real. Early dialogue can help the Forest be successful with high-cost projects, such as those presented with cable/skyline or helicopter logging.

Quarry Development

We are pleased to see the Forest include the potential for using rock from existing pits on the Forest. ‘On-Forest’ rock pits and the associated products that can be made from them (pit run, crushed aggregate, etc.) can help reduce future costs for maintenance and timber harvest projects. Costs associated with hauling rock long distances have escalated in recent years, often representing a significant cost in timber sale implementation for our members. The rock source for required and optional road work usually influences timber sale economic viability. The long haul distances from commercial rock sources can lead to economically non-viable timber sales.

Additional Project Design Criteria Comments

We are pleased to see the broad operating periods associated with logging operations proposed in the project. However, we continue to be concerned with some of the relatively narrow Limited Operating Periods (LOPs) identified in the Project Design Criteria. While we understand most of these are related to ESA obligations, the narrow windows these create to operate can significantly challenge the economic viability of projects being offered. Helicopter and cable thinning operations are the most impacted by these. Efforts to minimize these LOPs so that operations on the ground have the most significant number of days available are strongly encouraged by AFRC.

We are pleased to see the Forest include tethered harvesting equipment for this project and provide flexibility for winter operations. This will be critical for the economic viability of the harvesting projects.

Thank you for the opportunity to comment on this project. We look forward to participating in the further development of this proposal. If you have any questions regarding the above comments or additional information, please contact me at 360-352-3910 or mcomisky@amforest.org.

Sincerely,

A handwritten signature in blue ink, reading "Matt Comisky". The signature is fluid and cursive, with the first name "Matt" and last name "Comisky" clearly legible.

Matt Comisky
Washington State Manager
American Forest Resource Council