

To: Johanna Kovarik
Forest Supervisor
Gifford Pinchot National Forest
Re: Project #65884 Draft EA
From: The South Gifford Pinchot Collaborative
Date: 5-14-25



Forest Supervisor Kovarik and project leadership,

Please accept this letter as formal comments on behalf of the **South Gifford Pinchot Collaborative (SGPC)** pertaining to the **Forest Wide Thinning & Potential Control Line Treatments Draft EA (project #65884)**. Our group has thoroughly reviewed the Draft EA and has developed the below list of associated recommendations and comments.

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 members with a diversity of backgrounds including (but not limited to): conservationists, the forest products industry, community members concerned about GPNF, local government agency personnel, former US Forest Service (USFS) employees, and the outdoor recreation community.

The SGPC recognizes the unique ecological, socio-cultural and spiritual values associated with GPNF. As such, we support proactive management that protects valued resources while also prioritizing rural community wellbeing. While we have reviewed the Draft EA in its entirety, we have focused our efforts on the proposed action. In doing so, **we have developed the following comments/suggestions pertaining to the Draft EA:**

- We recognize and greatly appreciate the USFS consultation with both GPNF forest collaboratives when developing this project, including the incorporation of the SGPC's and Pinchot Partners' Zones of Agreement (ZOA) Documents for Plantation Thinning. We hope this dialogue will continue throughout the implementation of the project.
- We greatly appreciate the three-forest consultation conducted to develop this project and the interagency consultation with US Fish and Wildlife, WA Department of Natural Resources, WA State Historic Preservation, and Skamania and Klickitat Counties.
- We also very much support the noted engagement with all relevant regional tribes (i.e., Cowlitz, Yakama, Muckleshoot, Nisqually, Puyallup, Squaxin) during project development.
- In general, the document was well-written and easily interpreted including the Purpose and Need for Action, which outlined existing conditions and the associated impetus for the project (i.e., to improve stand conditions by reducing density and increasing diversity in previously regenerated stands).
- We support the outlined needs to: increase stand diversity, reduce fuel loading and address wildfire risk and threats to riparian areas and in-stream habitat, honor commitments to tribes, provide a sustainable flow of forest products, provide habitat for late-succesional *and* early-seral dependent species, and support Northern spotted owl recovery.
- We support active management of the proposed 156,963 acres in stands 35-78 years old in Matrix, LSR, and Adaptive Management Areas to increase forest resiliency. Some members, however, expressed concern over the proposed annual limitations (3,000-3,600 acres annually) and the associated requisite timeframe to achieve the total proposed acreage, especially given current federal staffing/funding cuts.
- We support the project's emphasis on maintenance and improvement of 56,620 acres of Potential Control Lines (PCLs) and the associated management sideboards noted on pages 24-25.

- In particular, we support 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 valued resources.
- We support the specified desired conditions to have healthy and vigorous stands that have a diverse native species composition and structure (e.g., early, mid, and late-seral).
- We recognize and appreciate the science tools used to assess current conditions on the Forest, as well as the modelling work undertaken to understand future desired/projected conditions.
- We appreciate efforts to understand and mitigate potential impacts from the project (i.e., indirect, direct, cumulative) on: fire and fuels, soil, hydrology, fisheries, wildlife, botanical and invasive species, transportation systems, recreation, scenery, and heritage resources.
- We appreciate the resulting fuel load comparisons between the proposed action versus the alternatives to understand potential tradeoffs associated with different management actions.
- We appreciate the limitations to new temporary roads but also support: (a) the maintenance of existing road infrastructure for future PCLs, and (b) maximizing road maintenance in timber sale contracts.
- Our members have diverse opinions about the proposed regeneration harvests acreage. Whereas some members appreciate that regeneration harvests are limited to 300 acres annually, others feel strongly that this acreage should be higher. However, all members agree that regeneration harvests should be used to enhance early-seral habitat (i.e., to promote ungulate habitat and landscape heterogeneity), promote huckleberry habitat, and to treat insect/disease infestations whenever possible. We would also refer USFS planners to our ZOA Document on Early Seral Habitat Creation for additional related suggestions.
- We support efforts to increase Late Successional Reserve stand development trajectory to become more complex and resistant to wildfires (e.g., multilayered, larger trees, reduction of canopy fuel connectivity, cooler/moister microclimates).
- We support the proposed riparian reserves outlined in Table 3 (pg. 15) and inter-agency coordination with the US Fish and Wildlife Service and National Marine Fisheries Service.
- We appreciate Table 5 and the provided information about eligible Wild and Scenic Rivers on the Forest and associated required assessments to protect these valued resources.
- We support flexible contracting (e.g., timing, hiring) that prioritizes local timber companies and efforts to restore local mill infrastructure.
- We support efforts to maintain and enhance existing valued recreation resources (e.g., trails, viewpoints, access points) within the scope of the project.
- Given its importance, we would appreciate more details about the proposed maintenance treatment plan (i.e., timeline, duration, long-term monitoring, requirements, funding).
- While we recognize and appreciate the importance and breadth and depth of the proposed action, we are also concerned about USFS capacity limitations due to the federal funding/staffing freezes. Consequently, we would appreciate regular updates on project progress and any associated barriers to implementation.

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

Sincerely,

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

SGPC Active Member Organizations (alphabetical)

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