



May 16th, 2025

Joshua Chapman
Natural Resources Staff Officer
Gifford Pinchot National Forest
987 McClellan Road
Vancouver, WA 98661

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

Mr. Chapman,

Thank you for the opportunity to comment on the draft environmental assessment (EA) regarding plantation thinning and potential control line (PCL) treatments on the Gifford Pinchot National Forest. I work for Interfor, a lumber manufacturer with locations throughout the United States and Canada. In the Pacific Northwest, Interfor is a purchaser of federal timber contracts and participates in local collaborative groups alongside the forest service and other stakeholders.

I would like to acknowledge the hard work completed by your staff and all the stakeholders involved with this EA. This project is a great undertaking by your organization and I'm excited to see it get implemented. With climate change, the increase of catastrophic wildfire, and a willing timber purchaser base; projects like this will help create a more resilient landscape.

The selection of 156,863 acres of plantations needing thinning is great, but limiting the acreage to 3,600 per year is concerning. If the forest was able to sell 3,600 acres of plantation thinning each year, it would take 43 years to implement this EA. With the pace and scale of treatment needed on the landscape, that is far too long to be effective. Many of the stands that are plantations today will age out before they're ever thinned, subjecting them to an additional EA for mature stand harvest. Does the forest even have the field staff to set up thinning projects on 3,600 acres a year?

I am encouraged by the scope and size of this project. Our contractor base really appreciates the ability to use tethered logging equipment on steeper slopes. Allowing 300 acres/year of regeneration harvest as well as creating 0.5-5 acre gaps are great to see on this EA. Additional opportunities to increase the number of gaps and regeneration harvest acres is always welcome. Being able to treat these plantations within Late-successional reserves is also encouraging if we are to protect old growth from the most common threats of wildfire, insects, and disease.

My other concern is regarding the future timber supply from the Gifford Pinchot. Will there be additional EA's for the stands that aren't plantations? Mature stands that are more than 78 years old will also need treatment. Will those be addressed in future EA's? It's important to remember that thinning plantations is only one part of maintaining a sustainable timber supply.

Creating 56,620 acres of PCL's across the landscape will aid wildland firefighters to control and contain wildfires. PCL's create opportunities for reduced flame length on a fire. The lower the flame length, the safer it is for wildland firefighters to directly attack without having excess fuel between them and the fire. PCL's across the landscape will also aid firefighting personnel in defense of local communities.

Thank you again for the opportunity to comment on the draft EA. Your team has taken on a lot with a project this size and moving one step closer to implementation. Interfor looks forward to our continued working relationship with the Forest Service to help address our nation's wildfire and forest health crisis.

Sincerely,



Neil Kissler
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