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May 16, 2025

Johanna Kovarik, Forest Supervisor
Gifford Pinchot National Forest
987 McClellan Rd
Vancouver, WA 98664

Re: Forest Wide Thinning & Potential Control Line Treatments Project

Dear District Ranger Black:

WildEarth Guardians (“Guardians”) submits these comments regarding the U.S. Forest Service’s proposed Forest Wide Thinning & Potential Control Line Treatments Project (Project) located on the across the entirety of the Gifford Pinchot National Forest. The Forest Service is proposing nearly 157,000 acres of commercial thinning in plantation stands and approximately 57,000 acres of hand thinning of trees less than 8 inches diameter breast height (DBH) to establish so-called potential control lines (PCLs) along linear f. The Forest Service’s timeframe for implementation of this project should it be approved is several decades, with up to 3,600 acres of commercial plantation thinning and up to 1,000 acres of

Guardians is a nonprofit conservation organization with offices in Washington, Oregon, and five other states. Guardians has nearly 200,000 members and supporters across the United States and works to protect and restore wildlife, wild places, wild rivers, and the health of the American West. Guardians and its members have specific interests in the health and resilience of public lands and waterways.

COMMENTS

I. The Forest Service Needs to Prepare a Programmatic Environmental Impact Statement

The Forest Service needs to prepare a programmatic environmental impact statement (PEIS) as this Project is part of a much broader plan, the Forest Service’s Wildfire Crisis Strategy (WCS), that involves similar actions to those under consideration here. When there are “large-scale plans for regional development, NEPA requires both a programmatic and a site-specific EIS.”¹ Here,

¹ *City of Tenakee Springs v. Block*, 778 F.2d 1402, 1407 (9th Cir. 1985); *see also Kleppe v. New Mexico*, 427 U.S. 390, 409-14 (1976).

the WCS is “large-scale plan[] for regional development” for which the Forest Service must prepare a PEIS.

The WCS is a strategy to “dramatically increase fuels and forest health treatments by up to four times current treatment levels in the West.”² The Forest Service acknowledges that the Project is “relate[d] to the [WCS] by ‘identifying the right locations and tools for fuels and forest health treatments.’”³ Thus, the Forest Service itself connects this Project to its broader WCS.

Congress also recognized the programmatic nature of the WCS, requiring the Forest Service to “determine whether to initiate the preparation of a programmatic environmental impact statement” after development of the WCS.⁴ We are unaware of the Forest Service making any such determination. If the Forest Service determined not to prepare a PEIS, it needs to revisit that decision now before further implementation of the WCS so the public has an opportunity to comment on the true scope and scale of the WCS and offer alternatives that could potentially provide better environmental outcomes than those being pursued by the Forest Service.

Even if the Forest Service does not prepare a PEIS related to its WCS, it still should prepare a PEIS for the Project. The Draft EA itself explains the programmatic nature of the Project. For example, if the Project is approved, the Forest Service says it would have a “phased implementation” due to the “large area covered by the analysis.” Draft EA 20. The Forest Service plans to “announce the selection of thinning units at the beginning of each Fiscal Year” and “start a public comment period for 20-30 days.” *Id.* In other words, the Forest Service plans to tier to this analysis across 157,000 acres of the Gifford Pinchot National Forest for *several decades*. The geographic and temporal scale of the Project requires a PEIS.

II. Forest Plan Amendment

The Forest Service also needs to amend existing forest plans throughout the entirety of the WCS area. Forest plan amendments “should be used to keep plans current and help units adapt to new information or changing conditions.”⁵ Amendments are required “to add, modify, or remove one or more plan components, or to change how or where one or more plan components apply to all or part of the plan area (including management areas or geographic areas).”⁶

Here, the WCS constitutes a significant change to all of the national forests to which it is being applied. Indeed, the Forest Service calls the WCS a “paradigm shift” in its land management practices “by focusing fuels and forest health treatments more strategically and at the scale of the problem, using the best available science as the guide.”⁷ In particular, the Forest Service’s development of potential operational delineations (PODs) and potential control lines (PCLs) are essentially new land use allocations that require consideration at the planning level.

² USDA-FS, Wildfire Crisis Strategy 3, FS-1187a (Jan. 2022) (WCS); *see also* USDA-FS, Wildfire Crisis Implementation Plan, FS-1187b (Jan. 2022) (WCIP).

³ Draft EA, Fuels Report 5.

⁴ 16 U.S.C. § 6592(i)(3).

⁵ 36 C.F.R. § 219.13(a).

⁶ *Id.*

⁷ WCS 4.

Forest Service research on PODs and PCLs underscores their relationship to planning.

In its most basic form, a POD is a polygon or container whose boundaries are defined by features suitable for fire control (e.g., ridgetops and roads), and within which information on ecological conditions, fire risks, *management opportunities*, and *strategic objectives* can be summarized.⁸

Identifying objectives and management opportunities to meet those objectives is precisely what the planning process under the National Forest Management Act (NFMA) entails. So while the Forest Service insists that “PODs are not Land Use Allocations (LUAs),”⁹ the fact is that they operate much the same as any other LUA.

Another reason for the need to consider PODs and PCLs in the context of an amendment is to determine whether, as the Forest Service claims, it is “using the best available science.”¹⁰ Under Forest Service’s planning regulations, whenever a forest plan developed, amended, or revised, it “shall use the best available scientific information to inform the planning process.”¹¹ In doing so, the Forest Service “shall determine what information is the most accurate, reliable, and relevant to the issues being considered.”¹² The Forest Service also “shall document how the best available scientific information was used to inform . . . the plan or amendment decision.”¹³ That documentation must “[i]dentify what information was determined to be the best available scientific information, explain the basis for that determination, and explain how the information was applied to the issues considered.”¹⁴

By developing PODs and PCLs outside of the NFMA planning context, the Forest Service evaded its obligations to “determine what information is the most accurate, reliable, and relevant” and have those determinations scrutinized by the public in the context of required notice and comment processes.¹⁵ The Forest Service should remedy this by initiating an amendment process so the public has a chance to weigh in and scrutinize the scientific basis for large-scale “paradigm shifts” in how national forests across the western U.S. are to be managed for years into the future.

III. Timber targets

The Forest Service also needs to disclose the degree to which the Project and the WCS are being prioritized for the purpose of meeting increasing timber targets. In April 2022, the Forest Service published a report documenting how the agency could increase the annual output of timber

⁸ Thompson, M.P. et al., Potential operational delineations: new horizons for proactive, risk-informed strategic land and fire management, *Fire Ecology* (2022) (emphasis added).

⁹ Draft EA, Fuels Report 1.

¹⁰ WCS 4.

¹¹ 36 C.F.R. § 219.3.

¹² *Id.*

¹³ *Id.*

¹⁴ *Id.*

¹⁵ 36 C.F.R. §§ 219.4(a); 219.5(a)(2)(ii).

volume sold throughout the National Forest System.¹⁶ The Timber Targets Report outlined a series of so-called “barriers” to increasing timber volume sold.¹⁷ For example, the Forest Service requested that Congress enact “legislative fixes to address the challenges created by litigation,” which, the agency said would “help increase timber volume sold.”¹⁸ The Forest Service also emphasized “expediting environmental analysis for active forest management projects, including fuel reduction and timber sales, especially in the wildland-urban interface setting.”¹⁹ In addition, the Forest Service specifically identified the Pacific Northwest as one of three regions that “should have the greatest increase in total volume sold.”²⁰

In February 2023, the Forest Service Chief announced an increase of the agency’s timber target to 4 billion board feet (BBF) annually.²¹ The Region 6 targets increased from 575 million board feet (MMBF) in FY2023 to 653 MMBF in FY2024.²² The Forest Service needs to disclose the relationship between the increase in regional timber targets and projects such as the one proposed here.

IV. The Draft EA fails to consider impacts to soil carbon and the cumulative impacts related to climate change.

The Forest Service failed to analyze the effects on soil carbon stocks even though that represents 32.7 percent of the total carbon stocks on the Gifford Pinchot National Forest.²³ In fact, the Draft EA does not even discuss soil carbon even though it did in the recent Draft EA for the Little White Salmon Project.²⁴ The Forest Service needs to analyze and disclose the effects of the Project on soil carbon stocks.

V. Invasive Weed Control and Herbicides

The Forest Service references the “Site-Specific Plant Treatment Project” documentation to support its analysis of invasive weeds.²⁵ We do not think it is appropriate to tier to a 17-year-old site-specific EIS that that applied to just 2,687 acres.²⁶

In order to tier to a previous environmental document, the Forest Service “shall discuss the relationship between the tiered document and the previous review, and summarize and incorporate by reference the issues discussed in the broader document.”²⁷ There is no discussion about the 2008 Plant Treatment FEIS and how, 17 years later, it informs the environmental

¹⁶ USFS, Timber Targets Report, *available at* www.fs.usda.gov/sites/default/files/fy2022-agency-timber-target-report.pdf.

¹⁷ *Id.* at 2.

¹⁸ *Id.*

¹⁹ *Id.* at 3.

²⁰ *Id.* at 2.

²¹ David Lytle email (Feb. 23, 2023).

²² *Id.* at 4.

²³ Gifford Pinchot National Forest, Little White Salmon Project Draft EA 40.

²⁴ *Id.*

²⁵ Draft EA 72-74.

²⁶ *See* 70 Fed. Reg. 49905 (Aug. 25, 2005).

²⁷ 40 C.F.R. § 1501.11(b)(1).

analysis for the LWS Project. The Forest Service needs to disclose this information and determine whether it needs to update its analysis on invasive weed control. We also urge the Forest Service to reconsider the need for any road construction (temporary or otherwise) as that creates vectors for the spread of invasive weeds (and then the use of additional herbicides).

The Forest Service acknowledges that roads are vectors for invasive plants and that the PCL portion of the project is poses a particular risk for the further spread of invasive plants.²⁸ The Forest Service claims, however, that post-disturbance monitoring “would allow early detection of new infestation or existing infestation that may be expanding into newly disturbed sites.”²⁹ The Forest Service does not explain how, at a time that the agency is experiencing significant cuts to its staff, it will be able to effectively implement post-disturbance monitoring.³⁰

VI. Northwest Forest Plan Amendment

The Forest Service claims that the commercial thinning part of the Project that would occur in late-successional reserves (LSRs) would be in stands under 80 years old.³¹ However, the Forest Service is also in the midst of a process to amend the Northwest Forest Plan (NWFP) and part of the current proposed amendment would redefine young forests in LSRs up to 120 years old.³² The Forest Service needs to confirm whether it plans to keep the commercial thinning part of the Project that would occur in LSRs in stands under 80 years old.

This is important since the NWFP Amendment process could conclude before a final decision is made on this project. If that occurred and the Forest Service wanted to change the scope of the Project to include commercial thinning in LSR stands up to 120 years old, it would need to supplement or revise the EA as that would be a substantial change.

Thank you for the opportunity to comment.

Sincerely,



Ryan Talbott
Pacific Northwest Conservation Advocate
WildEarth Guardians
213 SW Ash Street
Suite 202

²⁸ Draft EA 73.

²⁹ *Id.*

³⁰ See e.g., Eric Katz, ‘Biohazard’: Forest Service employees warn cuts have devastating, and disgusting, impacts, Government Executive (May 5, 2025) (according to one USFS firefighter, the Forest Service “is far closer to operational collapse than ever before”), <https://www.govexec.com/management/2025/05/biohazard-forest-service-employees-warn-cuts-having-devastating-and-disgusting-impacts/405021/>.

³¹ Draft EA 5.

³² NWFP Amendment DEIS, ES-9.

Portland, OR 97204
503-329-9162
rtalbott@wildearthguardians.org