



c/o Forest Supervisor  
Gifford Pinchot National Forest  
987 McClellan Rd  
Vancouver, WA 98661

*Objection submitted project website:*

<https://cara.fs2c.usda.gov/Public/CommentInput?Project=65884>

RE: Gifford Pinchot Thinning and Potential Control Line (PCL) Treatment Project Draft Decision and Final Environmental Assessment (EA) Objection

Pursuant to 36 C.F.R. Part 218.7, Hampton Lumber files this objection to the proposed draft decision for the Gifford Pinchot Thinning and PCL Treatment Project Draft Decision and Final EA. The content of this objection below is based upon the prior specific written comments submitted by Hampton Lumber in response to the Draft EA which are hereby incorporated by reference.

**Objector**

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Hampton Lumber, a fourth-generation, family-owned company, is an integral part of the timber industry in Washington and Oregon, with deep economic and social ties to numerous rural communities. The company's direct interest in the sustainable management of the Gifford Pinchot National Forest stems from its operational dependence on the forest's timber resources and its commitment to the well-being of the communities it supports.

Hampton Lumber operates as a critical economic engine in the Pacific Northwest. Our Cowlitz Division sawmills in Morton and Randle directly rely on consistent raw material outputs from

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the Cowlitz Valley Ranger District (CVRD) of the GPNF. These facilities collectively produce 510 million board feet (mmbf) of kiln-dried stud lumber annually, encompassing 60% Hem fir, 30% Doug fir, and 10% other species, which is distributed to both domestic and international markets.<sup>1</sup>

The operational viability of Hampton Lumber and, by extension, our capacity to support local communities, are intrinsically linked to the predictable availability of raw material from both private and public forestlands. Consistent, predictable, sustained yield from active forest management is not merely a business objective for us; it is vital to the long-term health of the National Forests we depend upon, and to the well-being of the rural communities we call home. This statement underscores our belief that ecological health and economic stability are mutually dependent.

The presence of Hampton Lumber's manufacturing facilities generates substantial family-wage employment, totaling 313 direct jobs, and creates significant indirect employment. This translates to \$31.2 million in local wages and benefits and \$30.7 million in payments to local logging, trucking, and road construction businesses annually. These contributions are fundamental to supporting local schools, businesses, and the overall economic well-being of the region.

## **General Objections to the Draft Decision and Final EA**

### ***Concerns Regarding Forest Service's Capacity (Funding and Staffing) to Achieve Project Objectives***

Hampton Lumber remains deeply concerned about our Forest Service partner's ability to fully implement the proposed actions and maximize the acres treated under this EA, given acknowledged limitations in both funding and staffing. The Forest itself acknowledges these constraints, noting that "numerous positions have been left vacant due to recent reductions in force and delayed resignation programs," which have "significantly hindered the implementation of active forest management". While the final EA states the Forest will "work with whatever funding and staffing we may have" and explore partnerships, this does not provide concrete assurance of achieving the project's ambitious scale.

The reliance on external partnerships to compensate for internal capacity shortfalls suggests a systemic challenge within the Forest Service that could undermine the project's long-term effectiveness and pace. While partnerships are valuable tools for leveraging resources, their necessity to meet the core operational mandates of a large-scale project indicates that the Forest

Service's internal capacity is structurally insufficient for the project's stated goals. This is not merely a temporary "concern" but a fundamental operational constraint that impacts the predictability and reliability of project delivery. If the project's success is contingent on variable external capacity rather than guaranteed internal resources, the objectives of "consistent, predictable, sustained yield" and "streamlined implementation" become inherently less reliable. This raises questions about the long-term feasibility of the project as currently conceived, potentially leading to unmet targets and continued degradation of forest health.

**1. The Selected alternative would not meet the project's stated purpose and need. The selected alternative provides inadequate assurance of consistent, predictable, and sustained timber yield.**

Despite the project's stated purpose to "provide a sustainable flow of timber to local communities", the proposed action, as analyzed, fails to provide adequate assurance of the consistent and predictable timber volume essential for supporting existing milling infrastructure and rural economies. The EA analyzes potential treatment of approximately 157,000 acres, representing only 12 percent of the 1.32 million-acre Forest. At the maximum proposed treatment rate of 3,600 acres per year, it would take over 40 years to treat this limited analysis area. The Forest itself concedes that this acreage is "likely more than what we can implement completely".

The project's analyzed scope and annual treatment limits, coupled with the Forest's own acknowledgment of likely incomplete implementation, reveal a significant disconnect between the stated purpose of providing a "sustainable flow of timber" and the practical reality of the project's design and anticipated execution. The project is presented as addressing the "need to provide sustainable flow of forest products". However, if the project is designed to take over four decades to treat only a fraction of the suitable lands, and even that is acknowledged as potentially unachievable, then the project's design itself is inherently limited in its ability to deliver a sustained and predictable flow at the scale required by the industry. The "sustainability" is therefore questionable in a practical sense. This suggests that the project, while contributing incrementally, is not structured to fundamentally resolve the long-standing issue of "unrealized timber yields" from federal lands, which is critical for the long-term stability of timber-dependent communities and industries. The gap between ambition and practical capacity remains.

**The Administration's recent emphasis on increasing timber production and the urgent need for active forest management to address escalating wildfire management costs and declining forest health are not adequately reflected in the project's constrained pace. there is a discrepancy between proposed pace/scale and urgent need for active forest management.**

The project's maximum annual treatment capacity, even at 3,600 acres of thinning and 300 acres of regeneration harvest, is insufficient to address the pervasive threats of "catastrophic wildfire, insects, and disease" across the vast NWFP area forests. The current pace means large areas will remain vulnerable for decades.

The project's lengthy implementation timeline and limited annual acreage, despite being touted as "streamlining", may inadvertently perpetuate the very challenges it aims to mitigate, particularly the escalating wildfire risk across the GPNF. "Streamlining" in the context of an "urgent need" for wildfire risk reduction implies a rapid increase in the pace and scale of treatments. However, a multi-decade project to treat a limited percentage of the forest, even if procedurally efficient (e.g., through NEPA), does not translate to rapid, on-the-ground operational scale.

The scale of the threat (e.g., 47,278 acres burned in 2020-2024) far outstrips the proposed annual treatment rate. This indicates that while the project may be procedurally "streamlined," its operational capacity is insufficient to meaningfully impact the "wildfire crisis" and widespread forest health issues in a timely manner. This could lead to continued and potentially increasing losses of forest resources and habitat to fire and disease before treatments can be effectively applied across the landscape, in addition to a significant risk to the community.

## **IV. Detailed Objections and Analysis of Forest Service Responses**

### **A. Inadequate Management of Matrix Lands for Timber Production**

In previous comments, we previously asserted that "with less than 15 percent of the NWFP's footprint is classified as "suitable for timber production" under the Matrix land use allocation, it is imperative that Matrix lands are managed in a manner to meet the need to provide sustainable flow of forest products long term". A clear differentiation between management objectives for Late Successional Reserves (LSRs) and Matrix lands is appreciated, where Matrix lands are intended "to produce commercial timber while retaining old-growth components and creating early seral habitat".

We explicitly stated our opposition to "variable-density thinning on Matrix lands," advocating instead for the proposed action on these 89,047 acres to "1) Explicitly identify timber production as the primary focus on stands identified as Matrix under a clearly outlined sustained yield principle; and 2) Significantly increase harvest intensity across available Matrix acres, including a management paradigm shift from thinning to regeneration harvest". The concern stems from the knowledge that "prioritizing the development of late-successional forest conditions through

thinning on Matrix lands will jeopardize the continuous supply of wood products from these stands".

The Forest responded by stating it has "attempted to balance the direction in the NWFP with [our] needs to address our ESA consultation and conservation requirements with our proposal". It clarified that the silvicultural prescriptions are aligned with the Western Washington Restoration Coordination Zone Biological Opinion (WWRCZ BO), which allows for 300 acres of regeneration harvest annually and permits thinning in Matrix with canopy covers ranging from 30-50% (average 40%) and gaps up to 5 acres, further asserting that modifying these prescriptions for Matrix lands would require reinitiating ESA consultation, potentially delaying the project for years.

It is imperative that the Final EA provides for the ability to sufficiently implement the right treatment on the right acreage at the right time. The Forest's response, while citing the need for balance and adherence to existing consultation documents, fails to adequately prioritize and maximize timber production on Matrix lands as explicitly intended by the NWFP, as urged by Hampton Lumber, and recently mandated by the Administration, the USDA, and USFS. The NWFP clearly designates Matrix lands for commercial timber production, aiming for "optimum and sustainable yield of timber". While ESA compliance is critical, the current approach appears to apply a conservation-oriented thinning prescription (variable-density thinning, described as a "restoration tool that can accelerate development of old-growth forest structure") to Matrix lands, which are primarily designated for timber yield. These variable-density thinning treatments applied broadly across the landscape effectively dilutes the timber production objective on these critical acres and is in direct conflict with current guidance and direction.

We continue to advocate for a proactive, science-based, and adaptive approach to managing these areas, focusing on overall forest health and resiliency rather than for narrowly-focused habitat development objectives. The focus on plantation thinning, rather than the planned harvest of larger remnant patches in the matrix, has hindered the economic goals of the NWFP and negatively impacted the timber industry.

The "balance" achieved in the WWRCZ BO, as applied to Matrix lands, appears to be a compromise that prioritizes ESA compliance over the full realization of timber production potential, even on lands explicitly designated for timber. The NWFP's objective for Matrix is "production of commercial yields of wood". Variable-density thinning is explicitly described as a "restoration tool that can accelerate development of old-growth forest structure". While some timber is produced, the primary silvicultural objective for variable-density thinning is ecological.

If this is the predominant treatment on 89,047 acres of Matrix, then the primary focus for timber production is not being met. The 300 acres of regeneration harvest is a very small fraction of the

total Matrix acreage, reinforcing that a "paradigm shift" to regeneration harvest is not occurring. The Forest's reliance on the WWRCZ BO as a constraint implies that the BO itself may not fully optimize timber production on Matrix lands, essentially trading potential timber yield for procedural expediency (avoiding re-consultation).

The argument that increased harvest intensity or a shift to regeneration harvest on Matrix lands would necessitate reinitiating ESA consultation highlights a significant procedural barrier that is hindering the Forest's ability to fully realize the economic potential and policy objectives for these specific land allocations. This procedural rigidity, while perhaps efficient in the short term, undermines the long-term goal of a "sustainable flow of forest products". This approach risks undermining the economic viability of timber production from federal lands, which we have clearly outlined as "vital".

If Matrix lands are not managed for optimal timber production, the overall timber supply from the GPNF will remain suboptimal, potentially exacerbating the "unrealized timber yields" problem and failing to fully support the "Executive Order on the Immediate Expansion of American Timber Production". The current "balance" appears to be skewed towards conservation, even on lands where a more aggressive timber production approach is ecologically and legally permissible under the NWFP.

The following table illustrates the stated objectives versus the proposed actions for Matrix and Late Successional Reserve (LSR) lands within the project:

<b>Land Use Allocation</b>	<b>NWFP Stated Management Objective</b>	<b>Proposed Action Primary Prescription</b>	<b>Primary Stated Outcome of Proposed Prescription</b>	<b>Actual Acreage in Project</b>
<b>Matrix</b>	To produce commercial timber while retaining old-growth components and creating early seral habitat <sup>1</sup>	Variable-density thinning (primary); Regeneration harvest (limited)	Accelerate development of old-growth forest structure; Promote early seral species; Increase structural diversity and build resiliency	89,047 acres (thinning); 300 acres/year (regeneration harvest)
<b>Late Successional Reserve (LSR)</b>	To protect and enhance conditions of late-successional and	Variable-density thinning	Accelerate development of old-growth forest structure; Increase	51,130 acres

Land Use Allocation	NWFP Stated Management Objective	Proposed Action Primary Prescription	Primary Stated Outcome of Proposed Prescription	Actual Acreage in Project
	old-growth forest ecosystems		structural diversity and build resiliency	

This table highlights that while Matrix lands are designated for commercial timber production, the primary proposed treatment (variable-density thinning) is largely aimed at developing old-growth characteristics and increasing structural diversity, which are more aligned with LSR objectives. The limited regeneration harvest acreage further underscores the lack of a "paradigm shift" towards maximizing timber yield on these lands.

### **B. Unaddressed Concerns Regarding Late-Successional Reserve (LSR) Stand Aging**

We previously expressed significant concern that "considering the limited annual treatment capacity, many LSR stands will exceed this age [80 years] before they can be managed". To address this, it was suggested that the Forest "clearly state that all stands under 80 years old in LSRs when the Decision Notice is signed are covered by this analysis and are available for treatment" or, at a minimum, "include an additional alternative that would allow for this adjustment once the NWFP is amended."

The Forest confirmed that NWFP Standards and Guidelines prohibit harvest in stands over 80 years old, and that thinning is allowed only in stands up to 80 years old. It stated that the project utilizes "Pechman Exemptions" for thinning projects in stands under 80 years old, which allows for implementation without pre-decisional Survey and Manage (S&M) surveys. The Forest Service explicitly noted that including Hampton's suggested statement (covering stands aging out) would necessitate S&M surveys, thereby delaying implementation. The Forest Service committed to "prioritize thinning the oldest plantations first with the goal of treating them prior to them exceeding 80 years old".

While the Forest Service acknowledges the 80-year age limit and commits to prioritizing older stands, its response provides no substantive or legally binding solution to the fundamental problem of LSR stands aging out of eligibility for critical thinning treatments during the project's multi-decade lifespan. The reliance on the "Pechman Exemptions" to avoid S&M surveys, while procedurally convenient, creates a rigid cutoff that prevents proactive management of stands that are currently suitable but will inevitably "age out" given the project's 40+ year timeline. This means that stands needing restoration to accelerate old-growth characteristics (LSR objective) may be left untreated, potentially increasing their vulnerability to wildfire, insects, and disease. The commitment to "prioritize" older stands is a management intent, but without a mechanism to legally "cover" these stands beyond the 80-year threshold at the time of actual treatment, it



remains an aspiration rather than a guaranteed outcome. This undermines the long-term effectiveness of the LSR management strategy, which aims to accelerate the development of complex, multilayered stands.

The procedural "streamlining" offered by the Pechman Exemption, when applied to a multi-decade programmatic project, becomes a long-term strategic impediment to achieving LSR objectives for stands that mature during the project's lifespan. The core issue is a conflict between a fixed legal age limit (80 years) for applying a specific procedural exemption (Pechman) and the dynamic reality of forest growth over a project spanning 40+ years. The Forest is prioritizing the immediate procedural benefit of the exemption now over the long-term ecological and management needs of stands that will cross the 80-year threshold later. This creates a "use it or lose it" scenario for thinning in these stands: if they are not treated before 80, they become ineligible under the current framework. This is suboptimal for accelerating old-growth characteristics, which is the primary objective for LSRs. This approach could lead to a significant backlog of unthinned LSR stands that eventually exceed 80 years. These stands would then either require entirely new, more complex, and potentially litigious NEPA processes for future treatment (without the Pechman exemption), or simply be left unmanaged. Failure to proactively manage maturing LSR stands directly undermines the NWFP's objectives for LSRs and could increase their susceptibility to disturbances like wildfire, insects, and disease, contradicting the project's overall goal of building resiliency.

**C. Limitations in PCL treatment effectiveness and sustainability undermining the project's stated purpose of enhancing wildfire management efficiency and effectiveness and expose communities and forest assets to greater wildfire risk and higher suppression costs.**

The "urgent need" for PCLs suggests that highly effective and reliably maintained fuel breaks are paramount, even if they require a more complex initial NEPA process. This strategic choice, driven by a desire to avoid procedural delays, could result in a PCL network that is less effective than optimally designed, or that degrades over time due to insufficient and unpredictable maintenance. This would undermine the project's stated purpose of enhancing wildfire management efficiency and effectiveness and could ultimately expose communities and forests to greater wildfire risk and higher suppression costs in the long run.

While supporting the proactive development of PCLs, we expressed "concern about the potential cost and limited effectiveness of non-commercial thinning focused only on fuels less than 8 inches DBH". It was further emphasized that "dedicated funding for ongoing PCL maintenance and a demonstrated capacity for reliable prescribed fire outcomes are crucial for the sustained success of fuel reduction efforts". The most recent reductions in force, restructuring and reduced funding (including Regional decisions to sweep Forest retained receipts) only exacerbates our concern.



The Forest acknowledged the funding concern and stated it would "prioritize receipts generated from the plantation thinning and regeneration sales to fund both implementation and maintenance of the PCL treatments". It explained that increasing treatment intensity for commercial removal in PCLs would require a stand-alone ESA consultation and pre-decisional S&M surveys, which would "delay this project's implementation". The Forest Service cited research (Davis et al. 2024, Radcliffe et al. 2025) supporting the efficacy of these non-commercial treatments, with additional maintenance needing to occur 5-15 years after initial treatment, and with required monitoring by Forest fire and fuels staff.

The Forest's reliance on non-commercial thinning, reduced staffing, and uncertain funding mechanisms for PCL maintenance raises serious concerns about the long-term effectiveness and sustainability of these critical wildfire risk reduction efforts. While the Forest cites scientific literature for the efficacy of small-diameter thinning, the concern remains that limiting treatments to <8" DBH may not sufficiently address all ladder fuels or create the most robust fuel breaks, potentially compromising their effectiveness as "shaded fuel breaks".

The funding model, prioritizing receipts from other sales, introduces an element of uncertainty for the sustained maintenance of PCLs, especially considering the Region's sweep of these funds earlier this spring. Without dedicated and predictable funding, the long-term integrity of the PCL network, crucial for "increasing future wildfire management efficiency and effectiveness", is at substantial risk. This is particularly concerning given the acknowledged "urgent need to implement the PCL treatment". Furthermore, the challenges of scheduling prescribed burns (e.g., air quality) further complicate the "reliable prescribed fire outcomes" needed for sustained fuel reduction.

The decision to avoid commercial removal in PCLs due to "delay" prioritizes immediate procedural simplicity over potentially more effective and self-sustaining long-term wildfire mitigation strategies. If commercial removal were permitted in PCLs, it could generate revenue directly from the PCL treatments themselves, potentially creating a more self-sustaining funding model for their ongoing maintenance. The current approach, relying on receipts from other commercial thinning sales, means PCL maintenance must compete with a "variety of aquatic and terrestrial restoration activities", among Administration, Department, Regional and Washington Office priorities, restructuring, staffing reductions, for funding and introduces financial uncertainty for a critical wildfire management tool.

#### **D. The analysis fails to integrate federal timber production directives**

The project, while procedurally aligned with federal directives, falls short of delivering the substantive scale and pace of timber production and active forest management necessary to truly

meet the "immediate expansion" and "boosting" goals. "Immediate expansion" implies a rapid and substantial increase in timber output. However, a project with a 40+ year timeline for treating a limited acreage (157,000 acres), even if it doubles past GPNF averages, does not align with the concept of "immediate expansion" at a national or even regional scale (Region 6 target of 653 MMBF). The 30-50 MMBF from this project, while a contribution, is a relatively small percentage of the larger regional target. Moreover, the Forest's own justifications for not increasing harvest intensity (e.g., on Matrix lands) or commercializing PCLs point to ongoing procedural "barriers" (re-consultation, S&M surveys), which directly contradicts the Executive Order's call to "remove barriers that impede effective forest management and timber production".

This suggests that the project, despite its positive contributions, may be more of a symbolic gesture or a constrained incremental step rather than a transformative effort to meet the ambitious timber production and active management targets set by recent federal directives. This could potentially hinder broader forest health objectives if the pace of treatment remains too slow relative to the scale of the problem and lead to continued frustration among timber-dependent communities and industries who rely on federal lands to meet raw material needs.

It is evident that the promised timber yields from projects on Forests managed under the existing NWFP have not been realized. Having had first-hand experience with the closure of Region 6 milling infrastructure due to the NWFP shortcomings, we reiterate our deep concerns about unpredictable or diminished timber volume and associated impacts to the Forest's communities and our business. With less than 15 percent of the NWFP's footprint is classified as "suitable for timber production" under the Matrix land use allocation, it is imperative that the matrix lands are managed in a manner to meet the need to provide sustainable flow of forest products long term.

We previously highlighted the importance of complying with the "Executive Order on the Immediate Expansion of American Timber Production which prioritizes boosting domestic timber supply, improving forest health through active management, and removing barriers that impede effective forest management and timber production".

Despite the Forest's assertion of consistency with EO 14225 and the stated potential annual timber output, the project's inherent limitations in pace and scope appear insufficient to truly achieve the "immediate expansion" and "boosting" of domestic timber supply envisioned by the directive. Stated simply, a project that takes over 40 years to treat only 12% of the Forest cannot be considered an "immediate expansion" of timber production at the scale required to meet national and regional targets (e.g., Region 6 target of 653 MMBF). The 30-50 MMBF from this project represents only a fraction (approximately 5-8%) of the Regional target, indicating that the project, while contributing, is not a primary driver of "expansion."

#### **E. Inadequate Acknowledgment of Barred Owl Competition as a Key Pressure in Analysis**

We previously stated, "We believe it is crucial that the Final EA's description of the affected environment and the no-action alternative acknowledge barred owl competition as a present and continuing threat. This factor, alongside fire, climate change, and historic logging practices initially listed by the FS, represents a key pressure on the ecosystem".

While the Forest Service asserts that barred owl competition is addressed in the Biological Assessment (BA) and BO, its explicit omission or limited integration within the core EA's description of the affected environment and no-action alternative presents an incomplete picture of the ecosystem's health and the true context for the proposed restoration. Barred owl competition is a significant and acknowledged threat to Northern Spotted Owl (NSO) recovery. If a primary purpose of the project is to "support Northern spotted owl recovery" through habitat improvement, then a comprehensive understanding of all major threats, including barred owl competition, should be central to the foundational analysis within the EA, not merely relegated to a separate BO. Failing to fully integrate this "key pressure on the ecosystem" into the EA's baseline conditions and no-action alternative means the EA may not fully capture the cumulative stressors impacting the forest, potentially leading to an underestimation of the urgency of, or specific needs for habitat restoration.

Barred owl competition is a major, ongoing threat contributing to NSO decline. While the project may not directly control barred owls, their presence and impact fundamentally shape the effectiveness and necessity of the NSO habitat restoration efforts that are part of the project's purpose and need. The compartmentalization of significant ecological threats (like barred owl competition) into separate documents, rather than their full integration into the primary EA, suggests a procedural approach that might obscure the holistic ecological context of the project. The "Affected Environment" section of an EA is designed to describe the existing ecological context and "key pressures on the ecosystem". By excluding this critical ecological pressure from the EA's core environmental description, the EA presents a less complete and potentially misleading picture of the overall health and challenges of the ecosystem that the project aims to restore. This approach, while procedurally justifiable from the Forest Service's perspective (i.e., not directly controlling owls), could lead to a less robust or less targeted restoration strategy if the full spectrum of ecological pressures is not explicitly considered in the primary decision-making document. It also hinders public understanding of the complete ecological rationale and context for the project's NSO recovery objectives.

## **V. Conclusion and Requested Relief**

Hampton Lumber objects to the Draft Decision Notice and Final EA for the Gifford Pinchot Thinning and PCL Treatment Project. While acknowledging the project's stated objectives and contributions, it is maintained that the proposed action, in its current form, does not adequately address critical concerns related to the long-term sustainability and predictability of timber

supply from Matrix lands, the practical implications of LSR stand aging, and the long-term effectiveness and funding of PCL treatments.

Furthermore, the project's proposed pace and scope appear insufficient to fully align with the ambitious goals and targets set forth by recent USDA and USFS directives for expanding timber production and active forest management. The environmental analysis, by compartmentalizing key ecological stressors, also presents an incomplete picture of the ecosystem's comprehensive health.

### **Request for Specific Modifications to the Decision Notice and/or Final EA**

To address the fundamental concerns outlined above, Hampton Lumber requests the following specific modifications to the Decision Notice and/or Final EA:

- **Matrix Land Management:** The Decision Notice and Final EA should be revised to explicitly commit to managing Matrix lands with a primary and demonstrable focus on maximizing sustainable timber production. This must include a commitment to significantly increased harvest intensity and a management paradigm shift towards regeneration harvest where ecologically appropriate, beyond the current constrained variable-density thinning. This may necessitate a re-evaluation of the Western Washington Restoration Coordination Zone BO's application to Matrix lands to better align with NWFP objectives and federal timber directives.
- **LSR Treatment Flexibility:** The Forest Service must develop a practical and legally sound mechanism to ensure that LSR stands identified for thinning are treated before they age out of eligibility (i.e., exceed 80 years). This could involve exploring amendments to the Northwest Forest Plan or programmatic consultations to allow for continued management of stands that reach 80 years during the project's long implementation period, rather than relying solely on a prioritization strategy that may prove insufficient given the project's multi-decade timeline. At a minimum, the Final EA should include an additional alternative that would allow for this adjustment once the NWFP is amended, or to allow for future re-consultation.
- **PCL Effectiveness and Funding:** The Forest Service should re-evaluate the long-term sustainability and effectiveness of PCL treatments. This includes exploring options for commercial utilization of larger diameter material where appropriate to provide a more robust and potentially self-sustaining funding mechanism for maintenance. A clearly articulated, dedicated, and predictable funding strategy for ongoing PCL maintenance and reliable prescribed fire outcomes is essential to ensure these critical wildfire mitigation efforts are truly effective and enduring.
- **Integration of Federal Directives:** The project's implementation plan and stated objectives should be revised to demonstrate a more aggressive pace and scale of timber production and active forest management that truly reflects the urgency and ambition of the Executive Order on the Immediate Expansion of American Timber Production and increased USDA/USFS timber targets. This includes a clear, quantifiable plan for how

the GPNF will contribute to the Region 6 timber targets beyond the current project's limited scope.

- **Barred Owl Acknowledgment:** The Final EA's "Affected Environment" and "No Action" sections should be amended to explicitly and comprehensively acknowledge barred owl competition as a significant and continuing threat to the ecosystem. This will provide a more complete and transparent ecological context for the project's restoration goals and its stated objective of supporting Northern Spotted Owl recovery.

### **Call for Enhanced Collaboration and Adaptive Management**

We reiterate our unwavering commitment to a productive and collaborative partnership with our Forest Service partners. We urge the Forest Service to engage in enhanced, proactive collaboration with stakeholders to address these fundamental concerns. This includes implementing adaptive management strategies that genuinely balance ecological restoration with the vital economic needs of timber-dependent communities and the overarching federal directives for active forest management and timber supply. Such collaboration should encompass transparent annual updates on project progress, detailed explanations of any barriers to implementation, and meaningful opportunities for stakeholder input on adaptive management adjustments throughout the project's lifespan.