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December 12, 2026

Objection Reviewing Officer:
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Portland, OR, 97204

Electronic submission of this Objection Letter was made via the Project Website at
<https://cara.fs2c.usda.gov/Public/CommentInput?Project=63961>

**Re: OBJECTION to the Little White Salmon Forest Resilience and Fire Risk Mitigation,
Gifford Pinchot National Forest, Project 63961**

Ladies and Gentlemen,

Please accept this Letter as the Sierra Club, Washington State Chapter, *Loo Wit Group's*, Objection to the referenced Project.

The Responsible Official for the project is Forest Supervisor, Johanna Kovarik.

The Sierra Club has objections to certain of the new material issued with the Final EA, as well as objections to comments which were not addressed to the Sierra Club's satisfaction.

The Table of Contents for this Objection letter follows:

Section I. Objections to certain New material in Final EA, and in other project documents, as well as certain new documents including the Draft Final Decision, Draft FONSI, and certain Specialist reports and Appendices.

Section II. The Sierra Club's replies, and Objections where indicated, to the Forest Service's (the "FS") responses in Appendix J to selected Sierra Club comments in its October 28, 2024 Comment Letter (the "Comment Letter"). Appendix J is a *new* document, with *new* statements by the FS, and the Sierra Club is entitled to respond to the Appendix J statements by the FS.

Section III. The Sierra Club identifies certain comments in the Comment Letter as Objections which were not addressed completely, or not otherwise satisfactorily addressed, in Appendix J.

SECTION I. THE SIERRA CLUB'S COMMENTS ON NEW PROVISIONS AND NEW DOCUMENTS NOT PREVIOUSLY PART OF THE DOCUMENTATION FOR THE LITTLE WHITE SALMON PROJECT

The following comments and objections in this Section I. concern issues, provisions and documents that arose after the designated opportunity for formal comment, which thus qualify as new matters appropriate for comment in this Objection.

A. Comment on New Survey and Manage Amendment, provided in the EA and in Appendix I to the EA

The Forest Service added to the project, after the closure of the Public Comment Period, a proposed project specific Amendment to the Survey and Manage provisions applicable to this project and to the Gifford Pinchot National Forest Land Resource and Management Plan (the "LRMP"). **The Sierra Club objects to the proposed Amendment to the Survey and Manage provisions as follows:**

1) It is unclear and unknown if the Forest Service provided notice of the proposed Amendment to members of the public who did not file Public Comments pursuant to the comment period. If the Forest Service has merely given notice to those members of the public who had submitted Public Comments during the Comment Period *and who were thus entitled to notice for the Objection process*, that limited notice by the Forest Service does not reach the public at large who had received notice during the Public Comment period but *who did not submit Public Comment*.

a) Persons and entities specifically interested in

the 2001 Survey and Manage Standards and Guidelines ("SM S&G"), which are ATTACHMENT 1 to the 2001 *Record of Decision for Amendments to the Survey and Manage, Protection Buffer, and Related Mitigation Measures Standards and Guidelines* (the 2001 ROD S&M")

might not have anticipated that the Forest Service would propose an amendment to the SM S&G, released in November, 2025, notice of which amendment, to the best of our knowledge, was sent **only to those members of the public who had previously submitted Public Comments**. Persons and entities *which had declined to submit Public Comments would not usually be entitled to legal notice of the proposed Amendment during the Objection time period*.

b) The original notice for public comment on the Draft EA of the proposed project was issued in September 2024 (with scoping prior to that time) and did not include any issues regarding SM S&G.

c) Availability of the results of Surveys to the public during a NEPA process is a *substantive issue*, and is in fact related to the *effects of the project*, and thus should be made available to the public during the NEPA process rather than being performed after the conclusion of the NEPA process and thus not part of a public process.

If the Forest Service failed to provide adequate public notice in 2025 to all interested members of the public (who had received notice in 2024 for scoping and public comments) for this substantive issue of the proposed Amendment, then the FS has not provided appropriate notice of the proposed Amendment, and the NEPA process for approving the Amendment should be redone. **The Sierra Club objects to that failure unless otherwise shown that notice was given to the members of the public on the original comment notice list rather than on the objection notice list..**

The Sierra Club requests that the Forest Service:

- i) confirm whether or not it provided public notice to all members of the public who had received notice of the original opportunity to comment; and
- ii) if the FS did not provide such broad notice, then provide full public notice to all member of the public who had received notice of the opportunity to comment, of the proposed amendment, and an opportunity for public comment to the public at large.

However, if the FS did provide notice to the public at large including those who did not file Public Comments, then the Sierra Club retracts this objection.

2) the EA and Appendix I state that Surveys of wildlife that are not completed prior to issuing the Final Decision under the EA will be conducted prior to any disturbances; see the following quote from page 8 of the EA, and page 2 of Appendix I:

“Allowing any required pre-disturbance surveys to occur post-NEPA decision but prior to final project planning and implementation would minimize impacts to project delivery while meeting the intent of Survey and Manage provisions. Post-decision surveys would be more targeted and efficient, focusing only on areas identified for actual implementation. As an added benefit, surveys conducted closer to actual disturbance would more accurately reflect current habitat conditions and species presence.”

The Sierra Club requests that the EA be amended to provide full public notice, and an opportunity for public comment and review process, of the results of each of the project Surveys when actually conducted. Such public notice and opportunity for public comment would meet the plain words of the SM Standards and Guidelines (Appendix to the 2001 ROD S&M), at page 24:

“Timing Requirements for Pre-Disturbance Surveys

*The intent of “surveys prior to habitat-disturbing activities” is to gather relevant information during the NEPA process so that it is available for the decision-maker before actions are taken. Ideally, this information would be available to the Interdisciplinary Teams during preparation of an EA or Draft EIS so it could be used in project analysis, formulation of alternatives, and evaluation of effects. Required surveys should be completed and their results included in an EA or Draft EIS whenever practicable. **This would have the added advantage that results would be available during the public review and comment process.** [emphasis added]*

Project schedules could be severely disrupted if the requirement for additional pre-disturbance surveys were imposed after the decision is made and final design, field layout, or contract preparation has begun. Therefore, the date of the decision is the cut-off date for the requirement to conduct “surveys prior to habitat-disturbing activities.” In other words, once the decision is made no additional survey requirements are imposed; no NEPA analysis will have to be re-done and no decisions will have to be re-made because of additional survey requirements.”

3) In addition, the Forest Service’s proposed amendment to change the date when Survey and Manage reporting is done does not comply with the requirements for amending or modifying the 2001 ROD S&M. See Page 58 of 2001 ROD S&M:

“9. Authority to Amend or Modify this Decision

As with other parts of the Northwest Forest Plan, amendments of forest and district plans that would modify the standards and guidelines established by this Record of Decision will be coordinated through the Regional Interagency Executive Committee (RIEC) and the Regional Ecosystem Office (REO) as described in the original Northwest Forest Plan Record of Decision.”

Although page 58 of the 2001 ROD S&M also states an expectation of *minimal modifications*, which would not require formal consultation with the RIEC and the REO, the Sierra Club finds that the proposed change in timing of the Survey and Manage process is not *minimal*.

As proposed, **the Sierra Club requests** that the Forest Service obtain approval of the REO and RIEC as changing the timing of the conduct of Survey and Manage is *not minimal*, and the **Sierra Club objects if the FS fails to obtain such approval.**

If the FS has already consulted with the REO and RIEC on this proposed amendment, and has received a decision, the Sierra Club requests that the consultation request and the REO and RIEC decision be posted to the project website.

B. Comments on New Provision for Withdrawal of Stands over 80 years of Age in LSR and of Trees over 20” DBH in LSR

The Sierra Club has six (6) comments on *withdrawal of*:

- i) stands over 80 years of age in LSR from treatment, and
- ii) trees over 20” DBH from treatment

as provided in new language on both page 3 of Draft Decision Notice and page 23 of EA. Both cutting of trees over the 80- year threshold and cutting of trees over the 20” threshold require approval of the REO, as noted on page 23 of the EA.

First, the Sierra Club appreciates this addition and the requirement of consultation with and approval by, the Region 6 LSR Workgroup.

The following language on Page 23 of the EA is new:

*“Thinning and other silvicultural treatments in LSRs are subject to review by the Regional Ecosystem Office to ensure that the treatments are beneficial to the creation of late-successional forest conditions. Prior to implementation, any treatments in stands over 80 years-old or removal of trees over 20” DBH **FN8** in LSRs would require consultation with, and approval by, the Region 6 LSR Workgroup. **FN9**. [NOTE: bold emphasis added for the reference marks to each of footnotes 8 and 9; and the letters FN were also added, as the superscript in the EA did not copy*

*“**FN9** At the time of finalizing this EA, the responsible official has decided to not pursue consultation with the Region 6 LSR Workgroup at this time. Treatment of LSR stands over 80 years old was left in the proposed action and analyzed in the EA to preserve future management opportunities.” [NOTE: bold emphasis added for the reference mark for footnote 9; and the letters FN were also added, as the superscript in the EA did not copy]*

Second, Sierra Club requests that the FS add to footnote 9 on page 23 the following words:

a) In the second sentence of footnote9, on page 23, please add the following words “and trees over 20 inches DBH”, immediately after the words “80 years old”.

as “removal of trees over 20” DBH” was included in the next to last paragraph on page 23 where reference to footnote 9 first appears. Contrary to statements in Appendix J, RS0156 (as discussed later in this Objection Letter), **nowhere in the EA, or Appendix D or the Specialist Report on Fire and Fuels Management, is there any statement that trees over 20 inches DBH will not be cut. The Sierra Club objects if the FS intends to cut trees over 20” DBH in LSR.**

Third, the Sierra Club requests that the FS please also add to the above referenced paragraph which was added on page 23 of the EA, the following words:

“...and approval by, the Region 6 LSR Workgroup, and must comply with all parameters listed in the REO Memorandum 694, dated July 9, 1996, including all of the Exemption Criteria in said Memorandum 694, including without limitation, Stand Attributes #1, #2 and #3 listed in the Exemption Criteria.”

The Sierra Club urges that the language suggested above, referring to those specific provisions in REO Memorandum 694, be included in the EA. Since the FS added the concept of withdrawal of certain stands and trees from the project unless it obtained Region 6 LSR Work Group approval, directing the attention of the FS to REO Memorandum 694 is appropriate as it addresses exactly those issues should the FS decide to request approval from the Region 6 LSR Work Group.

Please note that REO Memo 694, July 9, 1996 has an explicit prohibition on cutting trees over 20" DBH in any province, with limited exceptions, as well as additional limits on cutting individual trees exceeding 80 years in the listed provinces; see page 4, Stand Attributes #2 under Exemption Criteria:

*2. West of the Cascades outside of the Oregon and California Klamath Provinces, the basal-area-weighted average age of the stand is less than 80 years. Individual trees exceeding 80 years in those provinces, or exceeding 20-inches dbh in **any** province, shall not be harvested except for the purpose of creating openings, providing other habitat structure such as downed logs, elimination of a hazard from a standing danger tree, or cutting minimal yarding corridors. Where older trees or trees larger than 20-inches dbh are cut, they will be left in place to contribute toward meeting the overall CWD objective. Thinning will be from below, except in individual circumstances where specific species retention objectives have a higher priority. **Cutting older trees or trees exceeding 20-inches dbh for any purpose will be the exception, not the rule.*** [emphasis added]

The Sierra Club objects if the FS does not include those provisions in the EA as the FS has not included either a prohibition of cutting over 20 inches dbh or a prohibition on cutting trees exceeding 80 years of age, and therefore appears to implicitly include the right to request such authorization from the Region 6 LSR Work Group.

Fourth, the Sierra Club requests the following changes to Page 28 of the EA:

The Sierra Club requests adding to page 28 language for cross reference to footnote 9 regarding removal of stands over 80 years of age, or removal of trees over 20" DBH, as follows:

a) Wording should be added to page 28, first paragraph under Thinning, after the following existing sentence:

"The proposed action also includes thinning of conifers on 1,759 acres of mature forest (>80 years old)."

The Sierra Club requests the addition of the following sentence at the end of the sentence quoted immediately above:

"Removal of trees over 80 years of age in LSR and/or over 20 inches DBH in LSR would require consultation with the R6 LSR Working Group; see footnote 9 and its associated reference mark."

b) Wording should be added to the last paragraph on page 28, with a new sentence in the footnote cross reference to footnote 9 re the 20" DBH;

- Existing sentence:

"Thinning treatments proposed in LSR would be limited to trees 20 inches DBH or less."

- Requested addition to be added after the existing sentence quoted above:

"Removal of trees over 20 inches DBH would require consultation with the R6 LSR Working Group; see footnote 9 and its associated reference mark."

Fifth, the Sierra Club requests that any and all references throughout the EA, and in each of the Appendices to the EA, to ‘mature trees’ which are in LSR and ‘mature stands’ which are in LSR, be modified to include the need to consult with the Region 6 LSR Working Group and to obtain approval prior to any such treatment, as described on page 23 of the EA, and include a cross-reference to footnote 9 and its associated reference mark, *including but not limited to the following new provision on Page 6 of Appendix D:*

“Mature stands (≥ 80 years old) will have completed Survey and Manage surveys prior to being included in a timber sale or incurring any ground disturbance.”

By way of further example, Appendix D, page 28 refers to fuel reduction without any reference to the condition of REO consultation and approval for LSR stands over 80 years old or LSR trees over 20” DBH, which should be revised as a result of the addition of the new provision on page 28 of the EA and of Footnote 9 to the EA:

“Proposed control lines within mature and old growth understory fuel reduction stands”

Respectfully, the only inclusion in the EA, on page 23 of the requirements to consult with Region 6 REO could easily get overlooked in the extensive references throughout the entire text of the EA to Mature trees in LSR and Mature Stands in LSR. To ensure that readers and bidders on the timber sales and treatments for this project follow the correct procedures, the consultation with and approval of Region 6 REO prior to conducting treatments must be highlighted or cross-referenced throughout the EA.

The Sierra Club objects if the FS does not make the requested changes to the EA as failure to do so exposes mature trees, mature stands and old growth to inadvertent cutting without the required approval from the Region 6 LSR Work Group.

Sixth, the Sierra Club requests that the words ‘mature forest’, as used in the EA and its Appendices and Special Reports when referring to LSR, be clearly and explicitly defined as being ‘trees or stands over 80 years of age’ as well as “trees over 20” DBH”, as well as “Old Growth trees and stands’.

The EA frequently, but not always, uses 80 years of age as a descriptor of ‘mature’; however, the EA does not have a definition that would apply in all instances.

For example, on page 44, see the following sentence:

*“To better address the purpose and need, the project was expanded to include thinning of additional young forest plantations, fuel management activities, and **mature forest thinning (>80 years old)** ...”* [emphasis added]

See also without limitation pages 80, 36, 33, 28, and 7 of the EA for further examples of the use of the phrase ‘(>80 years old)’. However, there are many uses of the word ‘mature’ without the descriptive phrase, such as the five (5) instances of the word ‘mature’ on page 35.

In addition, after the inclusion of a definition of ‘mature’, the references in the EA, and in its Appendices and in its Special Reports, to mature forest should also be changed to “exclude treatment in mature forest in LSR, subject to page 23 and footnote 9.”

For further example, on Pages 50 and 53, where the phrase ‘mature’ occurs, add the following caveat:

‘except where in LSR, then subject to 80-year and 20-inch DBH restrictions as delineated on page 23 and footnote 9.’

The new definition of Mature in LSR should also include trees over 20” DBH, as well as excluding Old Growth trees and stands.

To the extent that the Sierra Club’s requests in this Section B are not incorporated into the EA, the Special Reports and the Appendices, the Sierra Club objects to the drafting of the EA as impacted by the addition of the new language on page 23 and footnote 9. The addition of such new language requires other consequential changes in the documents.

C. Comment to New Draft Decision Notice

The Sierra Club requests that the Draft Decision Notice, which is a new document, needs to be revised on page 3, to reflect and conform with footnote 9 of the EA and the related source paragraph on page 23 of the EA, to reflect the withdrawal of LSR stands over 80 years of age and withdrawal of mature LSR trees over 20 “ DBH until such time as consultation with, and approval by, the Region 6 REO LSR Workgroup is obtained.

If the change requested by the Sierra Club in this Section C is not adopted for the Draft Decision Notice, then the Sierra Club objects to the Draft Decision Notice. As a new document, the Sierra Club is entitled to make such a request and objection.

D. Comment on New Mapping of PCLs

The Sierra Club requests that the FS provide the following information on locations of PCLs, due to the new mapping provided, as described on page 2 the Draft Decision Notice:

- Linear mileage of PCLs
- acreage of PCLs
- Width of PCL treatment, on both sides of the PCLs
- Need detailed maps.

In addition, the Sierra Club on page 9 of its Oct 28, 2024 Comment Letter (referred to herein as the “Comment Letter”), Section III D, subparagraph 1, states:

“The EA does not specify how much area could be impacted by the PCLs. Of the 18 references to PCLs in the EA, none mention their proposed dimensions or acreages.”

Based on both the new map and the language quoted from the Comment Letter, **the Sierra Club objects to the failure of the FS** to provide the requested detailed information about the PCLs. That information is needed to determine the impact on the environment of the proposed PCLs, and to better inform the public for making comments. See also the Sierra Club's response below to RS0135.

Here, in the Little White Salmon project, there is no detailed mapping of PCLs, so the FS cannot make a meaningful hard look analysis as required under NEPA, and the public cannot make meaningful comment without that information.

The Sierra Club requests the similar type of information for the Little White Salmon project as was provided for the GP Forest-Wide Thinning and PCL project. The Forest-Wide project is more than 156,863 acres (plantation thinning) and 56,620 acres (PCL) (approximate total: 213,483 acres), so the FS surely can provide such detailed information for this much smaller project treating 13,249 acres of National Forest System lands.

If the requested information is not provided, the Sierra Club:

1) objects to fact that the newly revised map still fails to provide the information requested in the Comment Letter;

2) incorporates by reference from the Comment Letter, Section III, subsection D. subparagraph 1, found on page 9 of the Comment Letter, and restates it in its entirety as an objection; Note, see Section III Subsection B of this Objection Letter for a copy, in its entirety, of comments Section III, Subsection D on page 9 of the Comment Letter; and

3) further objects to the Response RS0135, as described in Section II of this Objection Letter, which is the FS' response to Comment Letter Paragraph III D. Note, the discussion of Response RS0135 lays out the Sierra Club's reasoning for that objection.

E. Comments on New Provisions in the EA, and on the Appendix C to the USFS Biological Opinion, which is a New Document, for the Northern Spotted Owl

The Sierra Club has comments on the new provisions and the new document for the Northern Spotted Owl.

1) for the USFS 2023 *STATUS OF THE SPECIES For Northern Spotted Owl and its Critical Habitat (Appendix C of USFWS Biological Opinion)*, note that **text regarding Critical Habitat and the Table 4.5, as well as Table 4.5 itself, are** missing in the document posted on the website: see page 105 of the pdf (i.e. page 2 of Exhibit C, Table of Contents), of the USFWS Bio Op, which states multiple instances on that page 2 of '*Error! Bookmark not defined*', including the following example:

*"NORTHERN SPOTTED OWL CRITICAL HABITAT ERROR!
BOOKMARK NOT DEFINED."*

The Sierra Club requests that the FS please provide the missing text and the missing Table 4.5 from the Appendix C to the USFWS BioOp, and post it on the Project Website.

2) The Sierra Club appreciates that Table 12, on page 75 of the EA, has been revised to show the difference between pre and post treatment acreage of spotted owl suitable habitat. However, there has been a *net collective reduction* of 2,500+/- acres of foraging habitat (-1,285 acres) and suitable NRF (nesting, roosting, foraging) habitat (-1,230 acres).

The Sierra Club objects to this significant reduction in suitable habitat as the Northern Spotted Owl does not have time to wait for replacement habitat to develop after treatment. We ask that the project be revised to withdraw all suitable habitat for the Northern Spotted Owl indicated on Table 12 of the EA from the proposed treatment.

3) We refer you to the Comment Letter, pages 7 and 8, Section III. B. for our full discussion of the issues that the Northern Spotted Owl faces. We incorporate herein by reference all paragraphs of Section III B of the Comment Letter, and restate them in their entirety as Objections. See the following for a quote of the entire subsection B:

“III.B. We are concerned about impacts to Northern Spotted Owls and their habitat.

1. According to the Wildlife Report, “the proposed action is likely to adversely affect northern spotted owls and is likely to adversely affect designated northern spotted owl critical habitat.” (W-37, with italics in the original text, as well as page 69 in the EA).

a. Under the Endangered Species Act, such designations should be accorded significant deference, particularly given the status of the Northern Spotted Owl. See references below.

2. Washington Dept of Fish and Wildlife has listed the Northern Spotted Owl (NSO) as Endangered. See https://wdfw.wa.gov/species-habitats/at-risk/listed?species=northern+spotted+owl&state_status=All&federal_status=All&category=All

3. The US Fish and Wildlife Services has acknowledged that the Northern Spotted Owl qualifies to be listed as Endangered, but that the USFWS has not yet taken steps to formalize the listing as Endangered.

4. The NSO needs even more protection now than in 1994, per the USFW's statements, in the 2021 update to the 2012 Critical Habitat Rule. For documentation that the NSO is qualified for Endangered Species status, see page 96 of the 2021 Rule: <https://www.federalregister.gov/documents/2021/11/10/2021-24365/endangered-and-threatened-wildlife-and-plants-revised-designation-of-critical-habitat-for-the>

a. The FS has failed to amend LRMPs in the region of the NWFP to require the protections of Critical Habitat in Matrix as set forth in the 2012 Critical Habitat Rule, as amended in 2021. See page 95 of the 2021 Rule: “...the USFS has not yet revised its forest plans and applied the recommendations of the 2011 Revised Recovery Plan nor expressly taken into consideration the 2012 critical habitat designation into these plans”

b. Also see page 96 of the 2021 Critical Habitat Rule: “Additionally, recent scientific findings and our December 15, 2020, finding (and supporting species report) that the northern spotted owl warrants reclassification to endangered

status emphasize the importance of maintaining habitat in light of competition with barred owls.” [emphasis added]

5. Based on the foregoing, the FS must recognize that the Northern Spotted Owl is qualified for listing as an Endangered Species – on both a Federal level and a State level. Accordingly, the FS should revise this project to more adequately protect the Northern Spotted Owl and its critical habitat.”

The Northern Spotted Owl is listed as Endangered in Washington State, and as Federally Threatened but eligible for listing as Endangered. Notwithstanding the USFWS Bio Op and its conclusion, the Northern Spotted Owl requires greater protection than currently provided.

The Sierra Club objects to the EA as it does not adequately protect the Northern Spotted Owl.

F. Comment on New provision re Repeat Treatments, in EA and in Specialist Analysis Fire and Fuels Management Report

The Sierra Club appreciates the addition of the following provision:

“Any repeat treatments would be analyzed through a separate NEPA review.”

which appears twice on Page 33, and twice on page 34, of the EA, and also on page 9 of the Specialist Analysis Fire and Fuels Management Report.

G. Comments Regarding the new references in the 2025 Fire and Fuels Management Special Report, to the GP Forest Wide Thinning & Potential Control Line Treatments Environmental Analysis Project (hereafter referred to as the “GP Forest Wide Thinning and PCL Project”). **We note that the Final Decision on the GP Forest Wide Thinning and PCL Project was signed October 9, 2025.**

We note that the March 2025 Fire and Fuels Management Report, was revised from the July 2024 Report and includes extensive references to the GP Forest Wide Thinning and PCL Project. We address several of those revisions below:

a) Middle of page 27, the following paragraph was modified and amplified:

*“Benefits associated with treated PCLs would be expanded by potential treatments from the Forest Wide Thinning & Potential Control Line Treatments Environmental Analysis. **Where the proposed actions of this project do not treat along PCLs in the project area, these “gaps” could be connected and treated** through the Forest Wide Plantation Thin and PCL Treatment EA.” [emphasis added]*

The Sierra Club understands that the two projects may well have overlap. However, the overlaps must be reviewed under NEPA and the public provided an opportunity to review mapping of the overlaps between the projects and details about the overlaps, and an opportunity to provide public comment.

The Sierra Club requests that the EA and the Special Report be revised to include provisions for such NEPA review, and public comment, of overlaps between the two projects. Due to the overlaps, cumulatively the reasonably anticipated projects i.e. the GP Forest Wide Thinning and PCL Project, will have significant impacts to the Little White Salmon Project Area that are not addressed in the EA currently as written.

Since the Final Decision and FONSI were signed on October 9, 2025 for the Forest-Wide Thinning and PCL project, it is no longer appropriate for the FS to defer any overview detailed analysis of the overlapping and cumulative impact of these two projects. At a minimum, the FS should:

- 1) disclose the 1,000 ft width of the PCLs (500 feet on both sides of roads) under the Forest Wide project, that would overlap with the Little White Salmon project, and
- 2) calculate the potential overall acreage to be thinned in the overlap areas, and
- 3) disclose that decisions would be made annually as to which areas would be treated, how much acreage will be treated, with annual notice to the public, and the duration of the Forest Wide project.

We know of course that the Forest Wide project is publicly available, but the impact in the Little White Salmon project area should be clearly identified and given the 'hard look' which is required by the FS decision makers as well as the public.

b) Next to last paragraph on page 27, the following new paragraph was added:

*"The need for maintenance is discussed throughout this report. Additional entries are important to maintain the desired condition because fuel treatments are time limited. Such entries would need to be addressed in different NEPA as it is not covered in this analysis. The ongoing analysis for the Forest Wide Thinning & Potential Control Line Treatments Environmental Analysis could be foreseen as a **potential authority** to be used for maintenance treatments where it overlaps with the project area."* [emphasis added]

First, the paragraph is inconsistent in referring to 'maintenance' while at the same time referring to 'additional entries'. The EA refers to new NEPA approval being required for repeat treatments; the EA does not refer to NEPA approval for maintenance. The Specialist Report should be revised to be consistent with the EA.

Second, suggesting that the GP Forest Wide Thinning and PCL Project could be seen as potential authority for maintenance treatments (requested to change wording to repeat treatments) rather than obtaining a new NEPA approval is extremely troubling and inconsistent with the EA.

The Sierra Club requests that the last sentence of the paragraph quoted above be removed from the Special Report.

H. The Sierra Club requests clarification of the difference between "Maintenance" (which we understand to be crews with hand-tools before additional entries), added as new concept to the 2025 Special Report on Fire and Fuel Management, and **"Additional Entries"** (which require NEPA review) a concept which is newly added to the EA and to the Special Report.

Definitions of both “Maintenance” and “Additional Entries” would be helpful in both the EA and the 2025 Fire and Fuels Management Report to ensure consistency of use.

SECTION II. THE SIERRA CLUB’S REPLIES, and OBJECTIONS WHERE INDICATED, TO THE FOREST SERVICE’S RESPONSES TO SELECTED SIERRA CLUB COMMENTS IN THE 10/28/24 COMMENT LETTER

In this Section of the Objection Letter, the Sierra Club addresses each of the FS’ responses to the Sierra Club’s Comment Letter dated October 28, 2024; the FS’ Responses are provided in Appendix J to the EA.

The following comments and objections in this Section II concern issues and FS Responses that by virtue of being included in the new Appendix J arose after the designated opportunity for formal comment, which thus qualify as new matters appropriate for comment in this Objection.

We will identify those Responses with which we agree, and those Responses to which we have no further comment.

In addition, we will also list and respond to those Responses with which we do not agree and believe need further attention and response from the FS.

The Sierra Club’s objecting to the specific FS Responses which are new material under Appendix J, are provided as Objections, as they tie to the original Comment Letter and the FS Responses in Appendix J obviously were raised after the original comment period, and thus entitle the Sierra Club to object.

A. Preliminary issue with the FS Response RS0157 through RS0160 re Inventoried Roadless Areas in the Little White Salmon planning area

RS0157 of Appendix J, as originally drafted, states that

“There are no IRAs in the planning area, as stated on page 21 of the draft EA.”

RS0157 through RS0160, as originally drafted, address the Sierra Club’s comments in the Comment letter regarding Inventoried Roadless Areas (“IRAs”).

Contrary to the FS’ statement in RS0157, the Sierra Club concludes that there are in fact IRAs in the planning area (sometimes also referred to in the EA as the ‘*project area*’ and sometimes referred to as the ‘*Little White Salmon Watershed*’).

As shown in the *Final Environmental Impact Statement, Volume 2 -Maps of Inventoried Roadless Areas, issued by the FS in November 2000*, the map of IRAs for the Gifford Pinchot National Forest, at page 99, a copy of which is attached hereto as **Exhibit 1**, does appear to show IRAs in the planning area.

However, in email correspondence dated December 5, 2025 addressed to Amy Mower, a member of the WA Chapter of the Sierra Club, the FS states the following, quoting in part:

“When the final decision for this project is is [sic] issued, Page 24 of the EA will be updated to read:

“There is Inventoried Roadless Area (IRA) within the Little White Salmon watershed boundary, but no project activities are proposed in the IRA, so it will not be discussed further in this assessment.”

Similarly [sic], Appendix J – Response to Public Comment, Comment ID #RS0157 will be updated to read:

“There is Inventoried Roadless Area (IRA) within the Little White Salmon watershed boundary, but no project activities are proposed in the IRA.”

The December 5, 2025 email also included a copy, provided at the Sierra Club’s request, of the FS’ recent map showing the locations of IRAs within the Little White Salmon watershed. A copy of the FS map is attached hereto as **Exhibit 2**.

The Sierra Club appreciates the FS’ acknowledgement that IRAs are located within the planning area, and that no project activities are proposed in the IRA.

So as to retain its objection should the FS, for whatever reason not make the changes indicated in the December 5, 2025 email described above, the Sierra Club objects to any aspect of the Little White Salmon project which would occur, as written in the Final EA dated November 2025, and as referenced in Appendix J RS0157, in the IRAs in the project area.

In addition for preservation of its objection rights, should the indicated changes not be made by the FS to the EA or to Appendix J, the Sierra Club also restates and incorporates in their entirety as **objections** its comments found on page 15, Section V of the Comment Letter. See the following copy of Section V of the Comment Letter:

“V. We are concerned that inventoried roadless areas (IRAs) are not formally recognized within the planning area.

- 1. Please revise the maps (Figure 5 on page 17 and Figure 6 on page 20) that show the locations of all IRAs within the planning area.*
- 2. Please revise the EA Planning Guidance section (pages 15-22) to explicitly document the management direction for IRAs per the Roadless Area Conservation Rule of 2001.*
- 3. Any thinning treatments in Inventoried Roadless Areas must follow the strict limitations listed in the Roadless Area Conservation Rule 2001, Section 294.13 (b)(1) (i). We expect no entries will be made into any IRA within the planning area.”*

If the changes listed in the December 5, 2025 email from the Forest Service are implemented, *then the Sierra Club withdraws the objections set out in this Section II Subsection A.*

Until such time as the December 5, 2025 emailed changes are implemented, the Sierra Club retains its objections regarding IRAs in the planning area.

B. Responses which the Sierra Club accepts

RS0115, RS0116, RS0119, RS0122, RS0128, RS0129, RS0134a, RS0134b, RS0139, RS0140, RS0141, RS0143, RS0144, RS0145, RS0146, RS0147, RS0148, RS0150, RS0151, RS0152, RS0153b

RS0121 The Sierra Club specifically thanks the FS for these clarifications:

*“Up to 349 acres of mature forest in LSR are proposed for forest thinning treatment (253 for fire risk mitigation and 96 for fire resiliency objectives).
Riparian No-Cut buffers imply no thinning in these areas.”*

C. Responses to which the Sierra Club has no further comment.

RS0114, RS0120, RS0142

D. Responses which need further attention and response from the FS.

We will specifically address those concerns below in the following list of the FS Responses that need further attention. We list the FS Responses in numerical order as listed in Appendix J.

RS0117 and RS0118

The Sierra Club objects to these two FS Responses.

First, throughout this Objection Letter, the Sierra Club has restated, and incorporated in their entirety, as Objections certain Comments in the Comment Letter. All of those Objections **together with all of the other Objections raised in this Objection Letter**, raise issues that should be addressed collectively in an EIS, due to the extensive issues impacting the environment.

By way of example, and without limitation, the issues raised in this Objection Letter, include but not limited to i) the reduction of suitable habitat for the Northern Spotted Owl and ii) amendment of the Survey and Manage portion of the Northwest Forest Plan, as well as iii) our issues and objection regarding Potential Control Line mapping and our request for additional detail; and iv) the initial draft failure by the FS to protect any Inventoried Roadless Areas located in the planning area, which we expect to be addressed in the Final EA incorporating the changes indicated in the December 5 email referenced previously, but should that not occur, then such failure to protect IRAs would be an issue for an EIS..

The Sierra Club objects and requests an EIS.

Addressing the second part of RS0117 regarding the creation of PCLs, the cumulative effects and impacts of Potential Control Lines on wildlife and habitat has not been evaluated adequately, and must be analyzed in conjunction with the extensive PCL work that has been proposed in the GP Forest Wide Thinning and PCL project. The extent of the PCLs in this project could have a cumulatively large impact on the environment due to:

- 1) the anticipated treatment widths along PCLs and the lengths of PCL; and
- 2) the extensive mapping of PCLs not only in the Little White Salmon project but also in potential overlap of the PCLs to be implemented under the Forest Wide Thinning and PCL Project which may well be in addition to mapped PCLs under the Little White Salmon project; and PCLs implemented from the Forest Wide Thinning and PCL Project are projected to be 500 ft wide on each side of the roadway.

The existing cumulative effects analysis has been made only from the perspective of fire management, but must also be analyzed for cumulative impacts to wildlife and habitat, particularly when the potential impacts of this project with the GP Forest Wide Thinning and PCL project are combined.

The Sierra Club objects to that failure to evaluate environmental impacts of the PCLs, and requests an EIS to address those issues.

We understand that a decision regarding the requirement of an EIS will not be made until the FS finalizes its decision-making process, but we urge the FS to require an EIS at the time of decision making.

RS0123

We understand that old growth will not have commercial harvest; however, we urge no non-commercial fuel reduction (8" or less DBH) treatments in old growth stands. Old growth draws benefit from the undergrowth; and old growth is fire resistant and does not need protection, certainly not by a 1,000-foot swath (both sides of a road or a PCL) as proposed in the Project. **We continue to object** to any such treatment and incorporate by reference and restate as an entirety our Comment at page 6, Section III subsection A. paragraph 5. of the Comment Letter. Copied below is Paragraph 5 of Section III subsection A paragraph 5 of the Comment Letter:

"III.A. We are concerned about logging of old-growth forests, stands, and trees. (this heading is found on page 5)

5. We object to any cutting, whether commercial or non-commercial, in old-growth forest or stands with old-growth characteristics – even if for understory fuel management. It is well known that old-growth trees and stands are quite fire resistant, and there is no need to cut them. We explicitly object to cutting in old-growth characteristic stands within 500 feet of the roads and/or PCLs."

RS0124

We appreciate the response, but please clarify the response as it is unclear if such activity is limited to Forest Road 1840 or would occur along all other roads and PCLs in the project. **If such activity would occur along other roads and PCLs in the project, we object.**

RS0125

We appreciate the response, but it should be modified to include the concerns raised previously in this Objection letter, in Section I above regarding both the definition of 'mature' and the required consultation with the REO per footnote 9 and page 23 of the EA prior to cutting any mature trees in LSR. **If those requested changes are not made, we object.**

RS0126

We are looking for confirmation that the Little White Salmon Project will comply with any future changes to the NWFP and the National Old Growth Amendment, if adopted.

RS0127

We accept but request that the FS include more detail in the EA about the transitional aspects of the Little White Salmon project area, rather than merely referring to research, as the transitional features should factor prominently in the planning of the Project, and the public deserves to know how the FS has defined the transitional forests.

RS0130

Accept, but request the FS to add the stipulation that all treatment of mature forest in LSR is subject to the REO restrictions on 80 year and 20-inch DBH tree harvest as delineated on page 23 and footnote 9. If the stipulation is not added, **then the Sierra Club objects.**

RS0131, 0132, 0132a, 0132b and 0133

The Sierra Club objects to these responses as the FS does not address all the issues raised in our comments nor provide protection of Critical Habitat as required in the 2012 and 2021 Regulations for Habitat and Species. **See also our comments and further objections** as set out in Section I of this Objection Letter

Since the LWS project will be cutting approximately 2500 acres of *suitable habitat*, of Primary Constituent Elements of nesting, roosting and foraging, even though the percentage of acres compared to the acres in the entire project is low, given the risk that the Northern Spotted Owl faces of extirpation, no argument can be made that the project is appropriately balancing the needs of the NSO with the purpose and need of the project. Although the FS shows that Critical Habitat is balanced, as the reduction of Nesting, Forage and Dispersal habitat is balanced by an increase in Dispersal and Nonhabitat acreage, that increase is not beneficial to the species. The loss of Nesting, Roosting and Forage habitat impacts the reproduction and survival capacity of the species.

Further, although the FS does list abutting ownership categories as subject to Federal Habitat Conservation Plans, to State Habitat Conservation Plans and to various State laws, rules and regulations, without verification of the abutting owners' compliance in the past with those restrictions, we do not know whether or not there are cumulative effects impacting the species. We do not know if there are active species in the surrounding forest

lands and thus we cannot determine whether or not the species has forest to disperse to outside of the LWS or if there are individual breeding birds that contribute to the LWS population.

RS0135

We appreciate that the FS added the Map at Figure 7. **However, the Sierra Club objects** to the balance of the FS Response. As provided above in Section I Subsection D above of this Objection Letter, the Sierra Club incorporates by reference and restates in its entirety, as an objection, Section III Subsection D of the Comment Letter, found on page 9 of the Comment Letter. *Note, see Section III Subsection B of this Objection Letter for a copy of in its entirety of comments Section III, Subsection D on page 9 of the Comment Letter.*

The details of the PCLs should be supplied. If such details can be supplied for the Forest Wide project, certainly details should be provided for this much smaller project. Full detail is required so that the public can be informed and make meaningful comments, and so the FS can take a 'hard look' at the issues and evaluate impacts.

RS0136

We accept the FS response regarding tiering for when the Final EA was drafted, although at this time since the Final Decision was signed on October 9, 2025 on the Forest Wide project the FS response is not accurate and thus the references to the Forest Wide Project should be reassessed.

In addition, however, we request that the objections we have to the Special Report on Fire and Fuel Management, see Section I H above of this Objection Letter, be addressed. The Special Report is part of the EA, and thus statements in the Special Report that discuss the Forest Wide Project in the context of the Little White Salmon project, and how the two projects may overlap regarding PCLs, are subject to the same issues as the EA regarding PCLs and tiering now that the Forest Wide Final Decision has been signed.

If those issues are not addressed, the Sierra Club objects to the failure to make those revisions.

See also above response to RS0135

RS0137

See above response to RS0135. **The Sierra Club objects** to the RS 0137.

RS0138

See above response to RS0136; see also above response to RS0117 and RS0118. **The Sierra Club objects** to the RS0138.

RS0149

The Sierra Club objects to the FS Response as it does not describe the fire risks to the community of Willard, as requested in the Comment Letter at page 12 section III J, copied below and incorporated herein by reference:

“There is reference to “fire risk mitigation” near Willard (EA-pp. 22, 28 and F-1), as well as to the “at risk” community of Stevenson (EA-p. 39). The EA should be revised to describe the fire risk in specific terms and how this project will mitigate that risk.”

The Sierra Club requests that the EA be revised to include the requested descriptions of fire risk for Willard. We accept that Stevenson was removed from the EA as the ‘at risk’ referred to Environmental Justice considerations rather than fire risk.

RS0153a

The Sierra Club objects to the FS Response. We continue to state, as we raised in the Comment Letter, that the WWRCZ Biological Assessment does cover the GPNF, and the Little White Salmon Project. Since the FS addressed this comment in Appendix J, which is a new document, and the Sierra Club raised it in the Comment Letter (see Pages 13 and 14, Section IV A.), **the Sierra Club objects.** See the following quote from pages 13 and 14 of the Comment Letter, incorporated herein by reference:

“IV.A. We are concerned that Riparian Reserves and buffers are not correctly defined in the Environmental Assessment.

1. The table on page 26 of the EA states that buffers can be on “either side” of the water course. The word ‘either’ means ‘one or the other’ but not both. However, the NWFP explicitly directs that Riparian Reserves shall be located on both sides of the water course. Since the Stream Protection Buffers are included within the Riparian Reserves, the rule of protection on ‘both sides’ should apply to the Stream Protection Buffers. ‘Each side’ is the wording used in both the NWFP Standards & Guidelines at pages C-30 and C-31, and in the NWFP Record of Decision 1994 at page 9. In addition, the LRMP, Amendment #11, provides ‘each side’ at page 2-4 and page 2-6, although at page 1-12 the Amendment #11 does use the words ‘either side’. Page 1-12 is in error.

2. We ask that the EA be corrected to reflect that the Stream Protection Buffers shall be located on both sides of the stream.

3. We note that in the Final Biological Assessment Timber and Resource Activities on the Western WA (MBS, GP and Oly) Collaboration and Restoration Zone -2024 (referred to as the (“WWCRZBA”), there is specific protection for municipal water sources in Class 1 Streams. See the table below, copied from page 210 of the WWCRZBA:

Table 61. Stream protection buffer (no-harvest buffer) widths by stream class.

Stream Class	Riparian Reserve (feet)	Stream Protection Buffer (feet)	Definition
Class 1	300	150	A waterbody containing ESA-listed fish, or municipal water source
Class 2	300	100' within 1,000' of a LFH stream, 75' outside of 1,000' from a LFH stream	Non-ESA listed fish-bearing streams
Class 3	150	60	Non-fish bearing streams - perennial*
Class 4	150	50	Non-fish bearing streams - intermittent

* if not field verified, or there is no information on file, perennial streams are presumed to be fish-bearing.

a. Although the EA on page 56 does refer to protection for the municipal water supply of Willard, clearly there are other communities south of Willard which may well obtain their municipal water from the Little White Salmon Watershed. We ask that the FS

evaluate those other communities, even though they are outside of the project boundaries, which obtain some of their municipal water from the Little White Salmon Watershed and provide the necessary buffer protection in the project for those communities.

b. We ask that the EA (including but not limited to pages 26, 29, 34, 37, 56, 57, and 59) and pages 3-5 of Appendix D) be corrected to include reference to Municipal Water Source requirements, including but not limited to the two Custom Buffers listed at the bottom of page 26, and including but not limited to:

- *the Table on page 26 and the two Custom Buffers on page 26, and*
- *the categories listed on page 29 of fuel management within Riparian Reserves, to reflect the correct buffer widths rather than the 20-foot widths shown on page 29, and*
- *the last line on page 37, protection of mature trees and biological hotspots in no-cut riparian buffers, and*
- *the first paragraph under Water Temperature on page 56, and*
- *the third paragraph under Other Fish Species on page 59.”*

We support our position by referring you to pages 18-22, Tables 6 and 7, and page 92-93 of the WWRCZ Biological Assessment. We understand that the FS has available to it the WWRCZ Biological Assessment, so that document is not copied here, but we do copy below the following from page 20 of the WWRCZ Biological Assessment as an example of the requirement to comply with the WWRCZ Biological Assessment:

*“A2. The Action Agencies shall incorporate relevant aquatic and terrestrial conservation measures along with PDC listed in this BA so that they translate into on-the-ground implementation (and as applicable, into environmental analyses, contract language, and all appropriate implementation plans). **All activities covered under this BA must be designed and implemented consistent with the description of the proposed action and project categories sections, the definitions section, and this PDC section, unless a variance is issued.**” [emphasis added]*

Not only are municipal water sources covered under the Forest Management section of the WWRCZ Biological Assessment, (see page 33 and page 210 of the WWRCZBA for tables which require for **Stream Class 1 a Stream Protection Buffer of 150 feet** for not only a *waterbody containing ESA-listed fish, but also a **municipal water source***), but there are also protections in the WWRCZ Biological Assessment for species such as Marbled Murrelets and Northern Spotted Owls, including of Critical Habitat, which should be followed in the Little White Salmon project.

By way of further example for the applicability of the WWRCZBA to the Little White Salmon Project, see the following:

Page 4:

“This BA includes a number of individual actions which, when grouped together, represent programs that may occur at many individual sites across the landscape, on a routine basis or sporadically, and over multiple years (Table 7). This programmatic approach provides each forest with a consistent methodology and

appropriate criteria for implementing, documenting, evaluating, and monitoring their land management activities. In addition, this approach facilitates ESA Section 7 and MSA consultation with FWS and NMFS and provides information in sufficient detail and quality to support the appropriate analysis.”

If the FS does not follow the WWCRZ Biological Assessment regarding buffers for municipal water sources as stated in the Comment Letter, **the Sierra Club objects.**

In addition, the Sierra Club suggests that the FS should follow the WWCRZ Biological Assessment for the other issues covered by that document. **Further, the Sierra Club incorporates by reference and restates in its entirety its comments on Pages 13 and 14, Section IV, Subsection A of the Comment Letter, [copied above] as an Objection, for the reasons stated above.**

RS0153c

See responses to **RS0153a** above and to **RS0153b** above

RS0154

The Sierra Club objects to the FS Response as it does not address the NWFP requirement that the Watershed Assessment be updated, as the updates are an ‘*iterative*’ process. When the FS states that the 1997 Watershed Assessment is sufficient to analyze the project ‘as a whole’ and identifying ‘known issues’, there is no information provided on how such a determination was made notwithstanding a 28 year-old assessment.

Unless the FS has performed a complete de facto assessment, and covered all issues that would be covered in an update to the 1997 Watershed Assessment, there is no scientifically valid way of making that determination. If the FS provides the public with such information, the Sierra Club would withdraw its objection.

In addition, the Sierra Club incorporates by reference and restates in their entirety, **as an Objection**, the Sierra Club’s comments from the Comment Letter, Page 14, Section IV subsection B, regarding the need to update the 1997 Watershed Assessment. A copy of those comments is below:

“IV.B. We are concerned that the Watershed Assessment of 1997 is out of date, and request that it be updated.

1. See page 56 of the NWFP ROD, and pages A-7, E-20 and E-21 of the NWFP Standards & Guidelines (S&Gs), which state that ‘watershed analysis is an ongoing, iterative process.’”

2. As the Little White Salmon is a Tier 2 Key Watershed under the NWFP, its water is important not only for surrounding communities but also for fish. There should be no proposals for work in the watershed unless and until the 1997 Watershed Assessment is updated.”

RS0155a

The Sierra Club objects to the way the FS Response was written as it omitted any reference to either new language on page 23 of the EA or to the new footnote 9 of the EA. Per page 23 of the EA, Mature trees over 80 years of age or greater than 20-inch DBH in LSR are specifically withdrawn from treatment under the EA until such time as REO approval is obtained. In addition, as discussed above in Section 1 of this Objection Letter, the Sierra Club requests that the addition to page 23 and footnote 9 be cross- referenced throughout the EA regarding Mature Trees in LSR.

Further the Sierra Club incorporates by reference and restates in their entirety its comments in the Comment Letter at Page 14, Section IV subsection C, as Objections regarding the SW Parcel in LSR. A copy of those comments is below:

“IV.C. We are concerned about the proposed cutting of trees older than 80 years of age in LSRs.

1. The NWFP ROD S&G page C-12 prohibits the cutting of trees explicitly West of the Cascades “There is no harvest in LSR stands over 80 years old.” Note that all project area mapped LSR LUA acres are either on the Cascade Crest or a short distance east of the Crest.

a. Since nearly all of the LSR LUA acres within the planning area are located on or near the Cascade Crest, it is expected that this direction will be applied to all the LSR acres in the planning area. For those LSR acres located East of the Cascade Crest and north of Willard (about 10 units per the Figure 5 map) the EA shows no cutting will occur.

b. However, the 350 LSR acres in stands over 80 years old where cutting is planned are all southwest of Willard [the SW Parcel]. We object to this cutting of the SW Parcel (as described on page 18), because it violates the NWFP direction. Please re-assess this EA direction.

2. Given that the NWFP Standards & Guidelines (page C-12) prohibits cutting trees or stands over 80 years of age in LSR on the West Side, and given that the FS wishes to cut trees over 80 years of age in the LSR known as the SW Parcel, the FS must limit such cutting of trees over 80 years of age to those trees which meet the following requirements:

- *trees that are 20” - 26” DBH at the time of cutting, and/or*
 - *trees that are less than 120 years of age at time of cutting.*
- Any request to the REO for approval of a waiver of the prohibition on cutting trees over 80 years of age must include the above two restrictions.”*

RS0155b

See the Sierra Club’s objection stated above for **RS0155a**

RS0156

A. The first paragraph of RS0156 states,

“No trees >20” DBH in LSR are proposed for cutting in this project.

The Review by the REO would be limited to harvest of trees over 80 years to mitigate fire risk in the Washington East Cascades province, where the SW parcels are located.

No age limit is included.” [emphasis added by inserting line breaks]

Since the 20” DBH issue was raised in our Comment and addressed by RS0156, we note that RS0156 **does not state that the FS will not make a request** for consultation with the REO 6 on obtaining REO approval to cut trees over 20” DBH. In addition, there is an inconsistency in the EA between i) size of trees treated under **thinning for forest resiliency**, which on page 23 says that

“Thinning treatments proposed in LSR would be limited to trees 20 inches DBH or less. Removal of trees over 20 inches DBH would require consultation with the R6 LSR Working Group; see footnote 9.”

and ii) size of size of trees treated under **thinning for fire risk mitigation**, which on page 33 says:

“Thinning treatments proposed in LSR would have a maximum diameter limit of 20 inches DBH.”

It appears that the FS is preserving the option of consulting with the Region 6 LSR Working Group to remove trees over 20” DBH.

The Sierra Club objects to any request to approve the cutting of trees in LSR including but not limited to the SW Parcel, exceeding 20-inches dbh.

B. In addition, regarding the NWFP age limit for stands in LSR not to exceed 80 years of age, we note that the FS has withdrawn, as a new provision in the Final EA, such stands from treatment consideration until such time as the FS obtains REO approval for cutting such stands. *If the FS does request such approval, the Sierra Club asks that the request include a stipulation that the age of the stands will be limited so as to protect trees maturing into old growth, as well as complying with the provisions of the REO Memo 694. The Sierra Club objects if that protection is not included.*

C. In addition, as stated in multiple places in this Objection Letter, due to the new provisions on page 23 and footnote 9 in the Final EA, the Sierra Club requests clarification throughout the EA on the need for REO approval for cutting stands in LSR that are over 80 years of age, particularly where-ever the words ‘mature trees’ are used without the qualifier of ‘over 80 years of age’. **If that clarification is not implemented, the Sierra Club objects.**

SECTION III. COMMENTS IN THE SIERRA CLUB'S COMMENT LETTER WHICH ARE INCORPORATED BY REFERENCE, AND RESTATED IN THEIR ENTIRETY, AS OBJECTIONS, THAT ARE NOT OTHERWISE ADDRESSED IN THIS OBJECTION LETTER

The Sierra Club incorporates by reference and restates in their entirety as **Objections** the following **two (2) sets of comments from its Comment Letter (indicated by page reference and section reference in the Comment Letter)** to the extent not otherwise addressed in this Objection Letter, as the FS has not satisfactorily answered, in Appendix J, the Sierra Club's concerns:

A. Page 5 – 7 Section III subsection A of the Comment Letter – *Logging of Old Growth*

There are 12 subsections to Section III subsection A of the Comment Letter. Subsections 1-3 and 11 were satisfactorily answered by the FS. However, although Subsections 4-10 and 12 of the Comment Letter were addressed in responses RS0124 through RS0127 RS0128 through RS0130, the Sierra Club has continued concerns both as reflected in the original comments, and as reflected above in the response in Section II of this Objection Letter to those FS Responses.

The Sierra Club restates and incorporates herein by reference as **objections, the comments set out in** Section III subsection A of the Comment Letter. **We specifically object to the FS' failure to satisfactorily answer Comments 4-10 and 12 therein.**

For context, Section III Subsection A, pages 6 – 7 of the Comment Letter in its entirety is copied below, and incorporated herein by reference:

III.A. We are concerned about logging of old-growth forests, stands, and trees.

1. The proposed action includes "thinning of conifers on 1,759 acres of mature forest (> 80 years old). Of these, 96 acres are in LSR." (EA-p. 23). However, the EA states on page 28 that 253 acres of LSR stands over 80 years old will be thinned to mitigate fire risk. There also is some confusion in Table 3 (EA-p. 23) regarding the acreage of mature forest thinning planned for LSRs. Please clarify which figures for LSR thinning in stands over 80 years old is correct and how many of these acres are planned for Riparian No-Cut buffers.

2. The EA states that "a majority of the stands in the project area are in the matrix" (EA-p. 18). However, "no reliable... methodology exists to map mature and old growth forests at fine spatial scales." (EA- p.10). How, then, will appropriate identification of and protection for old-growth and mature stands and trees be provided? Appendix F does go into extensive detail as to how the FS did identify both Mature Forests and Old Growth Forests for this project. If the FS supports the conclusions documented in Appendix F, please revise the EA to conform with Appendix F and eliminate the EA comment that "no reliable methodology exists..." for that purpose.

3. Page 29 of the EA states the following (Note: formatting is changed for emphasis, and FN 12 is not included):

a. "Understory Fuel Management in Mature and Old-growth Forest: Fuel management focused on material <9" DBH is also proposed across 332 acres in select mature forest and forest with old-growth characteristics that are otherwise not receiving treatments as described above.

b. "Forest stands with old-growth characteristics selected for understory fuel management are along priority PCLs and are important for increasing safety and effectiveness of potential fire management operations, improving safety of ingress and egress along key travel routes, and creating contiguous fuel treatment blocks with minimal disturbance to resources."

c. "Mature stands selected for understory fuel management are not limited to locations along PCLs but occur in landscape locations where treating the understory would support fire risk mitigation objectives while protecting other resource values."

4. Continuing on page 29, the EA states, "In stands with old-growth characteristics, treatment would be limited to within 500 feet of the road and/or PCL, where applicable, except for underburning, which could be applied to the whole stand if on-the-ground conditions are suitable without pre-treatment."

5. We object to any cutting, whether commercial or non-commercial, in old-growth forest or stands with old-growth characteristics – even if for understory fuel management. It is well known that old-growth trees and stands are quite fire resistant, and there is no need to cut them. We explicitly object to cutting in old-growth characteristic stands within 500 feet of the roads and/or PCLs.

6. Appendix F on page 1 states that "no commercial harvest will occur in old growth forest.." However, the FS also states on page 1 of Appendix F, "Non-commercial fuel reduction activities may be considered to meet fire mitigation objectives along PCLs and around Willard." "Non-commercial fuel reduction activities using hand-held equipment may be considered on a case-by-case basis to meet fire risk mitigation objectives along PCLs and around the community of Willard."

a. It is unclear whether or not the activity described above is to occur in old growth forest, as both page 22 of the EA, and Appendix F, page 1, do not indicate what type of stands or LUAs will have hand-held, non-commercial fuel reduction treatment. Please revise the EA to clarify.

7. The FS states on page 1 of Appendix F the following regarding commercial harvest in Mature Forests (as described pages 1 and 2 of Appendix F, emphasis added): "Commercial harvest will be considered in mature forest where forest health and resilience or fire risk mitigation is the main driver." "Commercial harvest in mature forest will not be considered for economic purposes only."

8. Another concern is how this proposed project will overlap and be governed by the pending Amendment to the NWFP, and the pending National Old Growth Amendment. Those documents may well provide important direction to this project, and should be considered in finalizing the project and its documentation in this EA. [See Section IV.]

9. The EA should be revised to provide an assessment as to which portions of the entire Gifford Pinchot Forest are considered moist and which portions are dry forests.

a. In particular, the EA should provide an assessment as to which portions of the planning area are considered moist and which are considered dry forests.

b. This assessment should be based on technical analyses backed by scientific data.

10. Even though the planning area is generally located immediately east of the Cascade Crest National Scenic Trail, this does not necessarily result in dry forest conditions. The

Little White Salmon Planning Area Landscape Evaluation Summary (WA DNR 2023, see EA-p. 9) may not be applicable to the specific forest conditions in the planning area.

11. We request that the EA be revised to provide a clear definition for all acres to be cut for any regeneration harvest by LUA.

12. We also request a clear, concise definition of all acres to be cut for any reason in LSRs, with an emphasis on any cutting in stands over 80 years old. The data in EA Table 3 suggests that cutting in LSR stands over 80 years old could be as great as 672 (96+253+323) acres.

a. Cutting in “Mature and old growth understory” for fuel management must be designated by LUAs and further designated by stand age for LSRs.

b. The maps in Figures 5, 7, and 8 should more clearly show the cutting units where “mature and old growth stands” will be entered for any reason.

As stated above, the Sierra Club objects to the FS’ failure to agree with and address the Comments raised in Subsections 4-10 and 12 above; those Comments are incorporated and restated as above, as Objections.

B. Pages 9 and 10 Section III subsection D. of the Comment Letter

With regard to references to the PCLs of the Forest Wide Thinning and PCL Project, although some PCL issues were addressed in RS 0122 through RS0124 and RS 0136, the Sierra Club has continued concerns both as reflected in the Comment Letter and as reflected throughout this Objection Letter.

The Sierra Club restates and incorporates herein by reference as **objections**, the comments in Section III subsection D of the Comment Letter. A copy of Section III Subsection D of the Comment Letter is set forth in its entirety below:

“III.D. We are concerned about the references in the EA to Potential Control Lines (PCLs).

1. The EA does not specify how much area could be impacted by PCLs. Of the 18 references to PCLs in the EA, none mention their proposed dimensions or acreage.

2. More important, under 40 CFR 1501.11, amended July 2024, the EA cannot ‘tier’ to an unapproved NEPA document, such as the pending EA for the Forest Wide Thinning & Potential Control Line Treatments in Gifford Pinchot National Forest, #65884. The scoping for this pending – not yet drafted – EA provides a forest-wide proposal for PCLs. The only time there can be references to and reliance on another EA, is when that other EA has been finalized. See references below:

a. 40 CFR 1501.11 (b) Tiering. “Where an existing environmental impact statement, environmental assessment, or programmatic environmental document is relevant to a later proposed action, agencies may employ tiering.”

b. See also page 21 League of Wilderness Defenders v. Connaughton, No. 3:12-cv-02271-HZ (D. Or. Dec. 9, 2014): “However, the Forest Service cannot tier its analysis to a forthcoming, uncompleted NEPA document.”

c. There is no approved EA for the forest-wide project #65884, and thus there

should not be any discussion of or reliance on unapproved project #65884 in the EA for this project (#63961).

3. There should be no discussion of the PCLs or PODs which are proposed in the Scoping for #65884, and the EA should accordingly be revised. However, should the FS disagree with our comment about inappropriate tiering, then until such time as we mutually resolve the issue, please revise this EA to provide specific information in terms of dimensions and acreage for the proposed PCLs.

*a. See also page 24 of the Fuels Analysis Report for discussion of the pending 2024 EA analysis forest-wide: “If the Forest Wide Thinning & Potential Control Line Treatments Environmental Analysis is completed and signed, **then commercial harvest would become another tool for treating plantations in the project area as described above.** However, as described above, there is an expected limit to the acres this authority would allow for treatment **in any single year and its use would be subject to Forest wide prioritization processes.**” [emphasis added]*

b. Given the possibility of additional commercial harvest if the forest-wide Project is approved, this issue should be addressed in an Environmental Impact Statement. Additional commercial harvest would have a significant impact on this watershed and its view corridors, as well as wildlife habitat and/or the Aquatic Conservation Strategy (ACS) objectives. The analyses in the above paragraph clearly would need to be addressed for this project, and would clearly merit an Environmental Impact Statement.”

The original comments incorporated herein and copied above in this Section III of the Objection Letter include analysis and comments as to why the Sierra Club requested the stated changes, and such analysis and comments still stand as support for now being treated as **Objections**, as the FS has not satisfactorily answered, in Appendix J, or in the EA or in any of the Appendices or Special Reports, the Sierra Club’s concerns.

In summary, we believe the above concerns warrant the preparation of a draft Environmental Impact Statement. We respectfully request that the Forest Service submit a draft Environmental Impact Statement before proceeding with this project.

Thank you for considering our Objections.

Respectfully submitted,

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