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ATTN: Northwest Forest Plan Amendment #64745

Thank you for the opportunity to provide comment on a Northwest Forest Plan (NWFP) amendment. As a forest collaborative working on the North Zone of the Gifford Pinchot National Forest in Southwest Washington, we share a common vision of a working forest with a thriving ecosystem, and vibrant communities that surround it.

The Pinchot Partners agree with and support the five identified needs for change within an updated Northwest Forest Plan. While the original NWFP has been successful in some areas, the Partners would like the Forest Service to build on what was successful to meet changing conditions; recognize that there were significant detrimental impacts on communities; and take steps to address these impacts. Furthermore, the members of the Pinchot Partners all find common ground in the shared goal of seeing the Gifford Pinchot National Forest around for generations to come, and recognize the spiritual and cultural values the forest provides, in addition to the variety of ecosystem services. The following paragraphs include things the Pinchot Partners would like to see included in an EIS.

Many of those who actively participate in the collaborative live within the wildland urban interface; having experienced several major fire events in the last few years, wildfire resilience for both the forest and the surrounding communities is at the forefront of many conversations. The intersection of fire management and traditional ecological knowledge has also been a topic of interest for our collaborative; we have had strong ties and involvement with the Cowlitz Indian Tribe since our inception, and fully support tribal inclusion within an updated NWFP. Additionally, the Pinchot Partners would like to see a concerted effort to identify and preserve cultural resources as a prioritized consideration.

Our collaborative places a strong emphasis on using the most recent, available science to guide management decisions. The Pinchot Partners would like to see the wealth of new research over the last 30 years added to the NWFP, especially around the topics of climate change and the management of mature and old growth forests. Based on the most recent monitoring findings by the NWFP Interagency Regional Monitoring Program, barred owls are a primary factor that negatively affects NSO demographic traits and population trends. Other factors such as habitat loss resulting from wildfire, and insects and disease have also contributed and concern about the impacts of climate change is also increasing.

As a group that was born directly out of the devastating significant economic impact of the original NWFP, our collaborative is uniquely invested in ensuring that an amendment includes a commitment to reviving the vitality of the rural communities that surround Forest Service land. The Pinchot Partners would like to see an emphasis on forest product infrastructure - efforts that both

maintain and improve existing infrastructure and prevent the further loss of infrastructure that has already decimated rural economies and communities that depend on a sustainable timber supply. We encourage the Forest Service to consider mechanisms within a NWFP amendment that encourage each forest to cultivate relationships within local workforce development, ensuring a qualified and skilled local workforce and that money spent on local harvest and treatments stays within local communities.

In updating the NWFP, the agency has a responsibility to these communities to contribute to their social and economic sustainability (36 CFR 219.8(b)). The Plan must improve the predictability of timber and non-timber products from national forests and ensure that local communities benefit from active forest management. The

amendment should also include plan components that hold the agency accountable to the Plan's stated intentions with respect to supporting rural forest-dependent communities. It can do this by directing the agency to prioritize the use of local contractors, requiring Forest Service employees to be based in the communities in which they work, and supporting local workforce training so people don't have to leave their home communities to find work.

In addition to investments in local communities, the Pinchot Partners have noticed a significant shift in Forest Service staffing and personnel over the last few years. Our Cowlitz Valley Ranger District, and the Gifford Pinchot National Forest as a whole, are chronically severely understaffed, with employees increasingly commuting or working remotely from outside the communities in which they work. To course correct these alarming trends, we request investments to ensure fully staffed ranger stations, and in ensuring that Forest Service employees live within the communities in which they work. This could include addressing local housing issues by investing in more Forest Service-owned housing, or efforts to close the gap between salaries and local housing markets. Additionally, the top-down nature of the federal hiring process makes it difficult or impossible for ranger districts to have control over their own hiring process; making this process local would allow qualified local community members to gain employment with the Forest, further integrating the national forest within the community.

The final common thread in our discussions around a NWFP amendment is the need for true adaptive management. Local forests and ranger districts have lacked the ability to respond and adapt to changing conditions quickly enough. Beyond the programmatic, policy, and planning needs mentioned, the Forest Service should consider a significant investment in financial support at the forest and district level to support the execution of the NWFP on the ground.

Again, the Pinchot Partners is grateful for the opportunity to comment on a NWFP amendment. We look forward to learning more about the changes being considered, and providing more thorough feedback to proposed actions in the Draft EIS later this year.

Sincerely,  
John O'Brien, Pinchot Partners Board Chair