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First name: Janene

Last name: Ritchie

Organization: Pinchot Partners

Title: Executive Director

Comments: Thank you for the opportunity to provide comments on the Northwest Forest Plan (NWFP) amendment draft Environmental Impact Statement (DEIS). As a forest collaborative working on the Cowlitz Valley Ranger District 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.

#### Full Collaborative Support

These comments are the result of many hours of discussion and conversation with our various partners, who represent diverse communities and perspectives in the Cowlitz Valley. The Pinchot Partners found full consensus on a number of actions, and will highlight that consensus on the following issues:

#### The Federal Advisory Committee's Process and Efforts

In 2003, the Pinchot Partners collaborative was born out of the recognition that business as usual in the Cowlitz Valley was no longer effective - that animosity between competing perspectives was unhelpful, expensive, and time-consuming, and that by bringing together many perspectives to focus on commonalities, we could perhaps enact the change needed to revitalize local economies. We believe strongly in the power of collaboration, and deeply appreciate the collaborative process of the Federal Advisory Committee that resulted in Alternative B of the DEIS. We know how much time and effort it takes to navigate complex discussions on contentious topics, and share our immense appreciation for the members of the FAC. They each committed to the collaborative process and dedicated many, many hours to arrive at the stated proposed actions, and we are grateful for their efforts. As such, the bulk of our comments will discuss the actions outlined in Alternative B, with a few exceptions or additions.

#### Tribal engagement

The Pinchot Partners fully supports the inclusion of tribes in planning and implementation of work guided by the Northwest Forest Plan amendment, as outlined in Alternative B. Currently language in the Draft implies increased Tribal consultation, but lacks direction on "how" it will be conducted. This collaborative recommends that the Final DEIS directs the Forest Service to deepen meaningful engagement with Tribes by incorporating Tribal knowledge from Native nations, and including Native nations in all aspects of forest management.

Additionally, the Pinchot Partners support the inclusion of language that allows for involvement from all affected tribes. As written, there is no provision within the amendment to prevent a tribe or tribes from being excluded in decision-making. Tribes do not always agree, and the amendment should recognize that nuance by providing some assurance that decisions regarding land that multiple tribes consider their usual and accustomed land will be made with the input of all those tribes.

#### Change in age classification of mature forests from 80 to 120 years

The Pinchot Partners found full support for the change in age of mature stands from 80 years to 120 years in moist forests. There is a concern among some members that there has not been ??not enough management activity to counteract climate change, and that stands that were 80 years at the time of the original NWFP are now nearing the 120 year limit, and potentially unharvestable by the time the amendment is approved and treatment occurs on the ground. These stands should be treated to address threats like climate change, wildfire, insect and disease. We also support the prohibition of timber harvest in stands over 200 years old in the Moist Matrix and prohibiting salvage in LSRs.

#### Fire Zoning/Community Protection Zone

The Pinchot Partners support hazardous fuel treatments within a  $\frac{1}{4}$  mile buffer around communities and infrastructure in the wildland-urban interface, as outlined in Alternative D; in fact, we support moving these specific actions into the preferred alternative for wildfire resilience.

#### Collaborative Concerns

The Pinchot Partners share concerns about a number of issues in the Draft EIS. Please note that the collaborative brings together many perspectives; the issues listed below represent the concerns of the collaborative; individual organizations will present other concerns, some competing, in their own comment letters.

#### Changes to survey and manage are necessary

The Pinchot Partners understand that changes to survey & manage species were off the table for changes within this amendment and are therefore outside the scope of the proposed actions and alternatives listed in the draft EIS. That being said, we believe that changes to the survey & manage program are the crux of meaningful change to the NWFP. The process of funding and completing the necessary surveys for the species currently included in the program is unwieldy, time consuming, and expensive. We support allocating dedicated funding for a periodic species review process. Removing unnecessary species from the list would decrease the amount of funding and time necessary, making the process more manageable.

#### Concern about the delineation of two forest types, dry and moist

The draft EIS characterizes forest types as either "dry" or "moist" using a suite of different methods that would be applied in project planning. The reality on the ground is that the landscape includes a gradient from dry to moist. The Pinchot Partners urge the Forest Service to consider flexible guidelines for transitional zones between forest types that provide managers with the ability to manage on the ground for both current and future conditions. The existing NWFP physiographic provinces were broadly applied across the planning area, while the proposed moist and dry classifications in this DEIS will be determined at the project level on a stand-by-stand basis. It is unclear within the proposed amendment as to whether these new directives using moist/dry

classifications overlay the existing physiographic provinces or if they replace them. We ask that the FEIS provide clarity on how these directives would be applied should they be implemented. The Amendment should be as clear and easy to follow as possible, in order to avoid confusion and potential conflict on how to define moist and dry forests and apply the guidelines on each and every stand, but utilizing ambiguously defined terms such as dry forest and moist forest to frame much of their management across a broad spectrum of forest ecosystem types will most likely make implementation challenging.

### Sustainable Timber Supply

The DEIS clearly outlines that the 1994 NWFP Amendment did not result in the level of timber harvest outputs that it anticipated. The proposed Amendment essentially removes 1.3 million acres from the Matrix LUA, reducing the suitable timber land base to just five percent of the footprint of the NWFP Amendment. The new desired conditions proposed in the amendment effectively turn those 1.3 million acres into quasi-Late Successional Reserves LUA.

We understand that the "lines on the map" are not being changed in this Amendment. Recommendations for the redesignation of land use allocations were not permitted to be considered by the Federal Advisory Committee tasked with providing recommendations to the US Forest Service for this proposed amendment. This severely limits the long term ability to treat harvestable acres over time and will require actions to offset the losses identified above in the Matrix LUA, including Matrix lands that currently meet the goals of Late Successional Reserves (e.g. "old growth"). For example, the FEIS would need to explicitly identify timber production as the primary focus on stands identified as Young Moist Matrix; increase harvest intensity - including regeneration harvest across available Matrix acres; and prioritize salvage on the remaining Matrix. Some partners feel that the FEIS should consider LUA redesignation, but we were unable to come to full consensus regarding what those redesignations would be at this time.

A sustainable timber supply anticipates the perpetual ability to harvest timber into the future. This is achieved by ensuring that harvests do not exceed growth minus mortality on the land base available for management. Reducing the acres available for management in the Moist Matrix LUA will further reduce timber outputs. However, the plan outlines a variety of new timber harvest locations and allowances, including logging in LSRs in dry forests, wildfire mitigation work (i.e., timber harvest) near communities, and an increase in the upper age limit in moist LSRs to 120, thereby opening some new areas to harvest. Although we suspect these changes will help with the initial timber harvest outputs it is unclear whether the supply is sustainable. The FEIS should clearly identify where and at what level of harvest can be expected over the long term.

Since adopting the 1994 NWFP Amendment, the forest products industry has largely updated its sawmills to process smaller diameter logs (less than 20" dbh) typically found in younger forests. However, not all forest products that the market demands can be sourced from young forests. Older and larger trees are required to meet these needs. Trees over 80 years old and over 21 inches have a market and are actively sought out by several sawmills in the NWFP's footprint. Products such as utility and transmission power poles, cross arms, and materials for mass timber are typically sourced from these older stands. Access to a broad suite of trees of various ages and diameters will help maintain the milling infrastructure needed to meet America's needs for wood products.

## Missing or Incomplete Analyses

The Pinchot Partners found a lack of robust analyses in a number of issues outlined in the DEIS, and more specifically in Alternative B.

## Economic Opportunities

The Cowlitz Valley, where our members live and work, was devastated by the shortcomings of the original Northwest Forest Plan. As the number of board feet coming off the forest ground to halt and many locals lost their livelihoods, towns like Morton, Randle, and Packwood were plunged into an economic hardship that they have yet to recover from. Reliant on funding from the National Forest, funding for schools and emergency services evaporated, and the eventual loss of a third of the Valley's mill infrastructure in the decades after the NWFP meant the loss of even more jobs and the capacity to process lumber locally. Coupled with the more recent rise in housing costs and further decline of mill infrastructure across the region, our communities are still suffering.

As a collaborative, our work lies at the nexus of ecological forest management and the economic health and sustainability of rural communities; we find that the economic opportunities section was woefully under-analyzed. This insufficient level of analysis neglected to consider impacts to timber supply and other economic benefits (e.g., commercial permits, Secure Rural Schools funding, etc.). The proposed actions in this section are unclear; the Pinchot Partners would like to see a final EIS that includes a more robust analysis of these issues coupled with more clear actions and objectives.

## Northern Spotted Owl Habitat

In the Biological Resources section, the DEIS briefly notes that the Northern Spotted Owls face 'extirpation.' Given the significance of this statement, the Pinchot Partners submits that the USFS conduct or incorporate further analysis evaluating the factors underlying Northern Spotted Owl decline; how the Northwest Forest Plan contributed to or delayed that decline; and how the plan anticipates supporting habitat restoration efforts that bolster recovery actions in the future.

## Funding for staffing and implementation

Though seemingly outside the scope of the parameters provided to the Federal Advisory Committee, we strongly believe that the FS should have analyzed what's available to fund these proposed changes, as well as the agency's capacity to implement while facing substantial staffing challenges. Given the current budget challenges facing the Forest Service; the recent volatility of federal funding; and several rounds of layoffs and reductions in staffing, the Pinchot Partners share grave concerns that this amendment will have been an exercise in futility if there is inadequate funding and staff capacity available to enact the proposed changes.

Support for a full revision

The parameters provided to the FAC for analysis of an amendment did not allow for a complete and thorough analysis of all the problematic issues within the current NWFP. The Pinchot Partners strongly advocate for retaining the current FAC in order to conduct a full analysis and revision of the NWFP.

Thank you again for the opportunity to provide comments in response to the DEIS. The collaborative has dedicated many hours, both collectively and individually, to these comments over the last few months. Our members have been tremendously impacted by the NWFP, and hope that the Forest Service will consider these comments thoughtfully.

Sincerely,

Pinchot Partners Board of Directors:

John O'Brien, Chair - Cowlitz Tribal member; Randle resident

John Squires, Vice Chair, Founding Director - Packwood resident

Ashley Short, Treasurer - Cascade Forest Conservancy

Anjolene Ngari, Secretary - Hampton Lumber

Matt Comisky, At-large - American Forest Resource Council

Bob Guenther, Founding Director - Thurston Lewis Mason Labor Council (retired)

Bill Little, Founding Director -; Lumber & Sawmill Worker Union Rep (retired)

Fred Norman, Director - Onalaska resident; Forest Service engineer (retired)

David Owen, Director - Randle resident

Andrew Spaeth, Director - Washington Department of Natural Resources

Pinchot Partners General Advisory Committee:

Amy Boyd - community member and forest policy analyst

Pinchot Partners Staff

Janene Ritchie, Executive Director

ATTACHMENT-LETTER TEXT: FINAL DRAFT 3.17.25 Pinchot Partners NWFP Amendment DEIS Comment Letter.docx (1).pdf; this is the same content that is coded in text box; it was originally included as an attachment["rdquo]