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Comments: Thank you for the opportunity to provide comment on the forest-wide plantation thinning and potential control lines draft Environmental Assessment (EA). As a forest collaborative working on the Cowlitz Valley Ranger District (CVRD) of the Gifford Pinchot National Forest (GPNF, or Forest) for the last 22 years, we share a common vision of a working forest with a thriving ecosystem, and vibrant communities that surround it.

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 support for a number of actions; we also have suggestions to consider for implementation and points where more clarity is needed within the EA.

Areas of Collaborative Agreement

Appreciation for early and often involvement from the Forest

We greatly appreciate the GPNF's early and often involvement with the collaborative, from the outset of this planning effort. Multiple presentations to the group and quick responses to clarifying questions made the Partners much more knowledgeable on the EA, meaning a simple and easy process to draft comments for both scoping and this draft EA, with no surprises. This level of engagement and involvement also makes it easy to share our support for these proposed actions.

Riparian Reserves

With regard to riparian reserves, the level of consensus within the Partners is this: we agree that active management in line with achieving specific ACS objectives should occur within riparian reserves, especially within plantation units. Individual stakeholder groups within the Pinchot Partners, however, differ in opinion on precisely what buffers within riparian reserves should look like.

Generally, the Partners support active management in the outer reserves, to include ACS goals as well as the potential for commercial timber management where site-specific variables deem it appropriate. However, active management in outer riparian zones should also be undertaken with the primary objective being restoration goals. We also encourage the Forest to consider silvicultural prescriptions in inner riparian reserve in order to maintain proper functioning condition and/or restore riparian conditions classified as functional - at risk to proper functioning condition. The Partners recognize the need for management in inner riparian reserves, especially in overstocked plantations where stands can be brought back in line with desired conditions and ecological functioning.

Collaborative Concerns

The Pinchot Partners share concerns about the following issues in the Draft EA. 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.

Staffing Capacity and Funding

The Pinchot Partners are concerned about the ability of the GP to maximize the acres treated under this EA, both from a funding and staffing perspective. Implementation needs boots on the ground, but many of those positions have been vacated due to reductions in force and delayed resignation programs. Recent calls by the administration to ramp up timber production compounded with a high level of vacancies at the agency have the Pinchot Partners concerned for the feasibility of fully implementing these proposed actions. These points coalesce into an even more crucial need for enhanced partnerships to ensure continuity in forest health

treatments, like the plantation thinning and PCL actions outlined in this EA.

Prioritizing Treatment on the Cowlitz Valley Ranger District (CVRD)

The Pinchot Partners encourage the GP to prioritize treatment areas in Lewis County. With a future influx of sales coming off the Little White planning area in the South Zone and knowing that the initiation of the Skate Creek planning area will be delayed, prioritizing treatment acres in the North Zone spreads the impact across the districts rather than concentrating it. In our many and varied discussions about the proposed actions, this became the primary concern among the Partners. We are most specifically concerned by the changes in timeline with vegetation management planning efforts on the Greater Packwood/Skate Creek planning area due to recent changes in staffing. We request that the Forest share updates with Pinchot Partners regarding annual implementation plans for this EA, so that the collaborative can understand where treatment will be happening, and why, on the landscape over time. We're hopeful that continued communication will allow us to provide continuous input about how to balance timber production needs across the forest with the interests of counties and other resource objectives.

Prioritizing Older Stands for Plantation Thinning

With over 150,000 acres of plantation stands in need of thinning and an annual limit of 3,600 under this draft EA, the Pinchot Partners are concerned that many stands will age past the 80 year limit before they can be treated. We encourage the GPNF to prioritize older stands at risk of aging out of these parameters, where possible.

Scope of Analysis and Treatment Capacity

We appreciate the Forest's recognition of the importance of providing a sustainable flow of forest products and its stated commitment to supporting the economic well-being of local communities through forest management activities. This is a vital component of long-term forest stewardship.

However, it is important to note that the EA evaluates potential treatments on only 12 percent of the Forest over the life of the project, approximately 157,000 acres out of the Forest's total 1.3 million acres. At the maximum projected treatment rate of 3,600 acres per year, it would take more than 40 years to address the entire analysis area. While we recognize that there is no easy solution to this issue, and that it's compounded by recent reductions in force among other variables, this raises concerns about the scale and pace of management relative to the Forest's broader restoration and production goals. We encourage the Forest to consider how the proposed pace of implementation aligns with its stated objectives and to evaluate opportunities for increasing management capacity where feasible.

Concerns Raised From Scoping

We appreciate that the Forest's worked to address the concerns listed below, and the Partners feel that they each need more attention in the final EA.

The Need to Analyze for Full Acreage Per Year

We appreciate that our request for the FS to analyze for the full 3,600 acres per year was included in the draft EA. Specialists' reports seem to inconsistently refer to an analysis area of either 3,000 or 3,600 acres. Please review specialists' reports to ensure the analysis acreage is consistent.

Forest Management Objectives and Desired Conditions for Land Use Allocation

We support the overarching objective of maintaining healthy, vigorous forest stands characterized by a diverse composition and structure of native species. However, during the scoping process, we urged the Forest to ensure that treatment prescriptions are tailored to the unique management goals of each land allocation, rather than applying a broad, one-size-fits-all approach.

For stands located within Late-Successional Reserve (LSR), we agree that management should prioritize accelerating the development of complex, multilayered stand structures that reflect late-successional characteristics. Conversely, for matrix and Adaptive Management Area (AMA) lands, we believe the primary

focus should be on achieving consistent, predictable, and sustainable timber yields through active forest management. These lands play a critical role in supporting local economies, and their management should reflect that function. To that end, we urge the Forest to more clearly define a desired condition for matrix and AMA lands that reflects their role in long-term timber production.

We also appreciate the distinction made between the management goals for late-successional reserve, the focus of which is developing stands with old-growth characteristic, and for matrix lands, which aim to produce commercial timber while maintaining old-growth elements and fostering early seral habitats, as outlined in the NWFP. Please ensure treatment prescriptions are varied to suit the overall goal of the specific land allocation where specific treatments occur, and not applied broadly in a one-size-fits-all approach. We recommend incorporating language that encourages the creation of a mosaic landscape. Taking this approach when selecting units for treatment could create a landscape that offers a range of ecological niches for different species and enhances the forest's resilience to disturbances, ultimately contributing to overall ecosystem health.

As mentioned, the Pinchot Partners are grateful for a robust relationship with the GPNF. We appreciate the opportunity to comment on this draft EA, as well as the presentations, involvement, and responsive to feedback of Forest Service staff throughout the process.

Sincerely,
John O'Brien, Pinchot Partners Board Chair