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Comments: Collin Neuhauser Objection

To clarify for anyone reading this, I am no longer working for the USFS but have 8 seasons of experience on multiple forests. The problems I observed in 2024 on the GPNF greatly surpassed any issues I observed on the other 5 forests I have worked on or the many others I have visited.

Objection 1 (Neuhauser_1 and Neuhauser_2):

The EA did not take into account the huge backlog of road decommissioning that has not been funded and the amount of erosion that will occur before the preexisting temp roads are decommissioned, if they ever are.

The EA did not make it clear to the public that there are different types of temporary roads. The statement in the EA that "All non-system roads will be decommissioned after completion of project activities..." is very misleading. The forest has not identified a reasonable timeline to decommission preexisting temporary roads. The forest is ignoring the ongoing erosion issues on preexisting temp roads that have yet to be decommissioned.

No other forest I have worked on has failed to map ML1 roads on the scale I observed on the Gifford Pinchot. What this forest considers to be preexisting temp roads would be considered ML1 roads on most other forests.

Because the road system is so poorly mapped, I suspect that past negligence in documenting roads and the poor road analysis completed in 2014 has led to the current negligence in decommissioning the preexisting temp roads that are being rebuilt for timber sales.

I also suspect that the entire situation is negligent because as soon as I asked a question about it as a seasonal employee, Bryce Michaelis sent an intimidating email to my supervisor and myself.

Solution to objection 1:

In the scoping period for the specific projects identify all preexisting temp roads that have no identified future need within 20 years. If there is a future need within 20 years, identify the need and how the road will be stored until then. If there is not a future need, identify how the decommissioning will be funded within 5 years. If no funding can be identified, the preexisting temp road should not be used.

Please produce maps using DSM and DTM LIDAR for each project so that the public can make informed comments.

Objection 2 (Neuhauser_4):

There has not been enough personnel or funding in the past to do effective EDRR for invasive species and many infestations have not been controlled. The FLT has shown that invasive species are not a priority by retasking the newly hire invasive species coordinator to act as a botanist for a large portion of their time. Relying on the counties alone to complete treatments is not reasonable, they do not have the staffing or time available to effectively keep up with treatments on the forest.

Solution to objection 2:

Retask the invasive species coordinator to spend the majority of their time coordinating invasive species treatments, mapping new populations and entering treatments into NRM. Contract out treatments as necessary to complete what is laid out in the EA. Please look at the contracts the Okanogan Wenatchee has put out.

Objection 3 (Neuhauser_5 and Neuhauser_9)

In one field season I observed many NEPA violations and contract violations just on one ranger district. The consensus from several specialists at the ranger station was that COs were spread thin and there was no accountability when they failed to ensure that contracts were followed. There was also a common opinion that the GP fails to do proper analysis in its EAs. Many specialists had their reports censored for the yellowjacket EA and were not allowed to contribute to this EA. It was especially troubling that district silviculture staff were kept out of the loop as they could have identified areas where incomplete stand data was likely to result in missed stands for this EA.

The contractor for the teacher pond culvert was not required to submit a dewatering plan before starting work and failed to follow many of the requirements in the stewardship contract.

The CO for the French Butte Seed Orchard gate failed to ask for gate placement coordinates before having it installed in the wrong location. They had a reputation for similar mistakes in the past with no accountability.

The Nash timber sale contractor bulldozed open roads in late 2024 and did not follow contract provisions that required temp roads to be winterized in order to prevent erosion.

The Soldier Thin debacle in 2024 was dumbfounding. So much went wrong with that sale that it is too much to say here. My understanding from partial information is that the timber program was covering up how badly it was going and that it was my concerned email to the district ranger and NEPA coordinator that escalated it to regional staff.

It is a huge problem that the few timber administrators are left to try to fix the preponderance of mistakes that make it through the analysis and layout phases due to negligence.

Solution to Objection 3

Hold staff accountable to complete their portion of the process so that errors don't accumulate to such a degree.

Monitor contractors and hold them accountable if they fail to follow the contract stipulations. Identify how a situation like what happened on the Soldier Thin is going to be avoided in the future. Explain why the contractor for the teacher pond culvert was not required to fix their contract breaches and identify how future in water work will be better monitored.

Objection 4 (Neuhauser_10)

I saw the ball dropped on road mapping up through the layout phase on the CVRD. Refusing to correct incorrectly mapped roads during the layout phase is negligent. Having no mandatory process to update the road system as errors are found is also negligent. I was able to map more than 80% of the road errors on the CVRD on my own time in less than a single field season. I hit wall after wall within the engineering department but found regional staff that would have been happy to help if they had approval to make the more complicated edits. The regional person I was in contact with retired so I am unsure which current regional staff could help. When I asked a member of the layout team why their layout maps of the Galena and Layser sales had incorrect roads, they said that the contractor would figure it out with a bulldozer. That struck me as a very problematic response.

Solution to objection 4:

Develop a mandatory process to update roads data before it gets to the layout phase or during the layout phase.

As part of the public comment process, identify mapping errors that will be fixed in the roads layer or fix them before opening the project area for comment.

Objection 5 (Neuhauser_6 and Neuhauser_7)

The stands missed by this EA, especially those last harvested from 1930-1960, should be identified for inclusion with a supplemental EA or watershed level EA.

Solution to objection 5:

As project areas are analysed, identify stands that look harvestable but did not end up in the EA. Prioritize them for stand exams to update the stand data layer add them to a list for future inclusion in a supplemental EA.

Also identify stands last harvested from 1930-1960 that can be thinned under the updated NW forest plan. Prioritize severely overstocked stands and those that have roads with moderate to high aquatic risk that should be decommissioned. Add these stands to a list for future inclusion in a supplemental EA.

Produce DSM LIDAR maps of project areas so the public can comment on stands that were overlooked in this EA.

Objection 6 (comment page 27-30)

The mineral block has severe access issues and incomplete stand data. A separate watershed level EA should be done.

Solution for objection 6:

Hold off on treatments in the mineral block until the planned watershed level EA is complete. Analyse the mineral block as one EA, the southern portion in the Tilton watershed does not have enough stands to justify a separate EA. Update the stand data in the mineral block by conducting stand exams where data does not seem correct based on historical imagery and DSM LIDAR. To improve access and public safety, replace the West Fork Little Nisqually bridge and do maintenance to the Winston Creek bridge.