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First name: Janene

Last name: Ritchie

Organization: Pinchot Partners

Title: Executive Director

Comments: Re: OBJECTION to the Gifford Pinchot National Forest Final Environmental Assessment - Forest Wide Thinning & Potential Control Line Treatments Project # 65884

Dear Forest Supervisor Kovarik:

The Pinchot Partners submits the following objection to the U.S. Forest Service's Draft Decision Notice (Draft DN) Finding of No Significant Impact (FONSI), and Environmental Assessment (EA) upon which the Draft DN is based for the Forest Wide Thinning & Potential Control Line Treatments. This project occurs on the Gifford Pinchot National Forest. The Responsible Official for this project is Joshua Chapman.

Pursuant to 36 C.F.R. § 218.8(d), the following is the lead objector's name, address, and telephone number:

Janene Ritchie

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Morton, WA 98356

513-255-0025

Interest and participation of objecting parties:

The Pinchot Partners are a non-profit forest collaborative that works within the Cowlitz Valley Ranger District on the Gifford Pinchot National Forest and surrounding areas, to promote watershed health, create quality local jobs, and encourage sustainable recreation. The Pinchot Partners strive to bring together differing perspectives in an open and safe forum in order to discuss and create innovative projects that incorporate the fundamental principles of ecosystem management in the Gifford Pinchot National Forest, recognizing that social values play an integral role in how we manage our public forest land.

We submitted timely comments on the Forest Service's Notice of Proposed Action. Our comments advocated for prioritization of stands on the Cowlitz Valley Ranger District in our EA comment letter dated May 16, 2025. This objection is submitted electronically within 45 days of the publication date and is, therefore, timely under 36 C.F.R. § 218.7.

Issues and parts of the decision to which the objection applies:

As presented in our EA comment letter, the Collaborative believes the Forest Service's decision is objectionable in the following ways:

1. Prioritization of Stands in the Cowlitz Valley Ranger District

The final draft EA does not adequately address the prioritization of stands on the Cowlitz Valley Ranger District. As stated in our comment letter dated May 16, 2025, the primary concern of the Partners became the changes in timeline with vegetation management planning efforts on the Greater Packwood/Skate Creek planning area due to recent changes in staffing. With decreased planning capacity resulting in the delay of a full EA in what was to be the Skate Creek/Greater Packwood EA area, the Partners are gravely concerned about the lack of implementation on the Cowlitz Valley Ranger District and the cascading effects on both forest health and timber volume, especially in the areas surrounding Packwood and Randle. With a future influx of sales from the Little White planning area in the South Zone and knowing that the initiation of a full EA planning process near Packwood will be delayed, prioritizing treatment acres in the North Zone spreads the impact across the districts rather than concentrating it.

Suggested Resolution

The Partners request a discussion that addresses including stands within the Cowlitz Valley Ranger District and our corresponding concerns regarding forest health and timber supply issues on the North Zone.

2a. Forest Service Capacity and Implementation Feasibility

The GPNF lacks the necessary internal capacity to successfully implement the project. Our comment letter raised concern about the GPNF's ability to maximize the acres treated under this EA, both from a funding and staffing perspective. As noted in the comment letter, positions have been vacated due to reductions in force and delayed resignation programs, which leads the collaborative to stress the crucial need for enhanced partnerships to ensure continuity in forest health treatments. This sizable challenge went unaddressed in the final EA.

2b. Inadequacy of Project Pace and Scale

With an annual treatment limit of 3,600 acres, it would take more than 40 years to address the entire analysis area of 157,000 acres. This pace does not align with stated project objectives, and is not commensurate with the scale of the need, whether ecological or economic. This objection is a direct consequence of the capacity issue stated above; the slow pace also threatens to undermine the ecological restoration goals of thinning by allowing stands to "age out" of eligibility for treatment, another objection stated below.

Suggested Resolution

The Partners request clarification about how the GPNF plans to leverage partnerships to ensure this work is accomplished at a rate that truly addresses the purpose and need listed.

3. Concerns Regarding Stand Age in Late-Successional Reserve (LSR)

Our comment letter expressed specific concerns about the long-term management of plantations within LSR, namely that many stands will age past the 80 year limit before they can be treated. We encouraged the GPNF to "prioritize older stands at risk of aging out" of the 80-year treatment window. This issue is exacerbated by the first two issues mentioned above, and was inadequately addressed in the final EA.

Suggested Resolution

The Partners request a discussion regarding how the GPNF plans to handle or address trees nearing or just over 80 years at the time of implementation.

4. Management Prescriptions and Land Use Allocation

The Pinchot Partners expressed support for the fundamental principle that silvicultural prescriptions must be tailored to the specific land allocation, leading to a mosaic landscape that achieves a balance of ecological and production goals. Our comment letter 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. While we appreciate the distinction between management goals for LSR and Matrix lands, we maintain that the final EA must ensure that treatment prescriptions are varied to suit the overall goal of the specific land allocation where specific treatments occur.

Suggested Resolution

The Partners request clarification and inclusion that management prescriptions will be differentiated based on land use allocation when stands are identified for treatment and implementation.

Request for Resolution Meeting

Pursuant to 36 C.F.R. § 218.11, we request to meet with the reviewing officer to discuss these concerns and suggested resolutions. In the event multiple objections are filed on this decision, the Pinchot Partners also

request that the resolution meeting be held with all objectors present.

The Pinchot Partners appreciate your consideration of the information and concerns addressed in this objection.

Sincerely,
John O'Brien
Board Chair, Pinchot Partners