Pinchot Partners
FOREST COLLABORATIVE

# Zones of Agreement

Position Statements on
Forest Management and Restoration Activities
on the Cowlitz Valley Ranger District of the
Gifford Pinchot National Forest

Last Updated: April 2024
Initiated: March 2020
pinchotpartners.org

# Table of Contents

# Acknowledgements

The Pinchot Partners would like to thank the Blue Mountain Mountains Forest Partners[1] and the South Gifford Pinchot Collaborative[2] for their extensive work on Zones of Agreement (Position Statement) that served as a model and inspiration for this work.

The document was initiated and revised by the Pinchot Partners Position Statement committee comprised of: Amy Boyd, Cowlitz Indian Tribe (CIT); Lucy Brookham, Cascade Forest Conservancy (CFC) Policy Manager and Pinchot Partners board member; Matt Comisky, American Forestry Resources Council, Washington State Manager and Pinchot Partners board member; Sharon Hanna, CFC volunteer and Pinchot Partners board member; Pete Krabbe, Randle, WA resident and Pinchot Partners Vice Chair; David Owen, Randle WA resident and Pinchot Partners treasurer; John Squires, Packwood, WA resident and founding member of the Pinchot Partners. Ethan Lockwood, Resource Assistant, organized the initial document format in 2018. Jamie Tolfree, former Partners coordinator, initiated and facilitated meetings to develop the document in September 2018. Janene Ritchie, current Partners Executive Director, restarted and continued facilitation of the Position Statement committee in March 2020 and continuing to the present.

Funding for this project comes from the Washington State Department of Natural Resources Building Forest Partnerships grant program (2019-2021; 2021-2023; 2023-2025); grants from the Forest Service Resource Advisory Council (2018-2022); and the National Forest Foundation Community Capacity and Land Stewardship grant program (2019-2020).

[1] Blue Mountains Forest Partners Zones of Agreement
[2] South Gifford Pinchot Collaborative Zones of Agreement

# About the Pinchot Partners

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, recognizing that social values play an integral role in how we manage our public forest land, and seeks to meet social needs while maintaining ecological integrity.

## *Mission*

The Mission of the Pinchot Partners is to work within the Cowlitz Valley Ranger District on the Gifford Pinchot National Forest and surrounding areas to promote policies and projects that create quality local jobs, recreational opportunities and benefit watershed health.

## *History*

Between 1997 and 2002 the gridlock over logging mature and old-growth forests and roadless areas effectively shut down timber production on the Gifford Pinchot National Forest (Gifford Pinchot National Forest). Tension between stakeholders ran high, the forest sat neglected, and forest industry jobs all but disappeared in East Lewis County.

In 2002, a Gifford Pinchot National Forest assessment found that 45-50% of the stands on the forest were between 40 and 120 years old. Many of these stands were overstocked plantations which lack the structural complexity critical to both wildlife and overall stand health. The lack of active management to restore these plantations hinders recovery of endangered species such as the northern spotted owl, marbled murrelet, and salmon and trout species.

Traditionally dependent on forest products from federal lands, the once timber-rich rural communities in East Lewis County grappled with severe socio-economic issues, including woefully deficient budgets for schools, population declines, loss of family-wage jobs, and the struggle to recreate vibrant towns. Since 1998, hundreds of the best paying jobs have disappeared, and the unemployment levels have skyrocketed to 30%.

It was these dire conditions that brought a group of community leaders together with the idea of organizing a field tour of the Gifford Pinchot National Forest in 2002. The objective of the field tour was to explore whether any areas of common ground existed between forest stakeholders who had very different perspectives. At the field

tour, approximately 50 individuals representing local community and tribal members, timber industry, conservation and labor representatives, and Forest Service officials cautiously agreed that projects that restore previously managed plantations, failing roads, and degraded creeks could be the key to getting people back to work in the woods.

In February of 2003, the Gifford Pinchot Collaborative Working Group (now called Pinchot Partners) was officially born following an exercise in which stakeholders each set forth their vision of the Gifford Pinchot National Forest and surrounding communities for the year 2103. Local residents told of their desire for liveable communities that afford children the opportunity to grow up and raise families next to "the most beautiful forest in the world." We heard from labor and industry about the need for living wage jobs working in the woods to help supply the ever-growing demand for wood products in the U.S., and how it makes sense for our domestic forests to provide a sustainable wood supply instead of getting our wood abroad where little or no environmental safeguards exist. And finally we heard a common desire to once again know that wolverine, lynx, and wolves roam the landscape, surrounded by a healthy and resilient forest that provides clean air, clean water and a diversity of plants, fish and wildlife.

This powerful exercise inspired everyone involved. The various groups recognized that our visions were not only compatible, but that combined, they created a stronger, more integrated, and ultimately more sustainable vision than we could accomplish by simply pursuing our various individual "special" interests. It is this shared vision that has inspired trust between stakeholders that were once adversarial, and today the Pinchot Partners use this vision to solve problems together.

> *"Those of us who were initially on opposite sides of the forest management spectrum realized that we didn't have to compromise our ideals to reach our goals. Instead, we could work together to achieve a common goal."*
>
> – Maree Lerchen, Former Partners Board Member

## *Stakeholders*

The Pinchot Partners represent diverse forest stakeholders who share a vision of healthy forests and vibrant communities:

- ***The labor community*** has been an active participant in the collaborative group since its inception. Labor interests recognize the critical dearth of family wage jobs in the Cowlitz Valley and are working with the collaborative group to address this need.
- ***The Cowlitz Tribe*** is intimately engaged in the collaborative group because the Gifford Pinchot National Forest encompasses much of the tribe's historic homelands. The tribe is concerned about the health of the watersheds and is also searching for ways to provide stable opportunities to tribal members that allow them to continue to live and work on their traditional lands.
- ***Cowlitz Valley residents*** from Morton, Packwood, Randle, and Onalaska are involved in the collaborative group because their towns are slowly eroding and their way of life is at risk of disappearing. Residents are painfully aware of the dearth of family wage jobs and are interested in finding ways to put people back to work in the woods.
- ***The timber industry,*** including Hampton Lumber and the American Forest Resource Council, is involved in the collaborative group because it is looking for ways to increase the volume of harvest on the forest.
- ***Conservationists,*** including the Cascade Forest Conservancy, are involved because they believe the group represents an exciting new way of accomplishing restoration work in the forest, while healing old scars and creating a lasting legacy for future generations and land managers.
- ***Community based forestry experts*** are involved in the collaborative so the Partners can benefit from the experience and learning of similar projects in other communities.
- ***The Forest Service*** has been very supportive of the collaborative group and the work it is pursuing on the Gifford Pinchot National Forest. The Forest Service has a clear interest in supporting the development of a common ground agenda that leads away from gridlock and toward work being implemented on the ground.

## Document Purpose

The purpose of this Pinchot Partners Position Statement document is to provide a record of the Pinchot Partners' current position and areas of agreement on 4 topics as of June 2021. Further, the Position Statement serves as a historical record of the collaborative's work on vegetation projects within the Gifford Pinchot National Forest North Zone planning area. The purpose of this document is two-fold:

1. It allows Pinchot Partners members and others to clearly understand what Pinchot Partners has discussed and agreed to with respect to a particular topic. By documenting our decisions and the scientific, economic, and social drivers behind them, Pinchot Partners will be better able to track our agreements and progress towards addressing disagreements about forest management. New members, organizations, potential funders, legislators, the general public, and the Forest Service can utilize this document to better understand the work and history of the group.
2. The Position Statement can be used by the Forest Service to assess and track the level of agreement around management of a particular forest resource. Pinchot Partners envision that as the Forest Service identifies a planning area for treatment, the agency will consult the Position Statement for an assessment of the areas of agreement held by Pinchot Partners on that topic. The agency may then engage Pinchot Partners directly about the Position Statement to determine whether they still reflect the thinking of this collaborative group, and whether Pinchot Partners would like to see them considered in the planning process as the Forest Service develops its purpose and need for the project. The Position Statement can provide a quick overview of the pertinent issues and a general sense of the level of agreement around management of the forest resource or process in question. Pinchot Partners and the Forest Service can then work together, along with other stakeholders, to develop project-specific applications of the Position Statement as appropriate.

With these ends in mind, the Partners seek to have the Forest Service consult this document when they are identifying a planning area and treatments that concern a topic area that the Partners has worked on. This Position Statement is intended to provide guidance to the Forest Service on management topics common to the issues contained within this document. When project-specific management concerns arise that are not addressed here, the Forest Service may seek additional input from the collaborative. The Partners recognizes that the Forest Service retains full decision making authority and discretion to follow or deviate from the Pinchot Partners Position Statement.

In summary, the Pinchot Partners and Forest Service may use the Position Statement document to better track agreement, to build greater collaborative efficiency, and to increase the pace and scale of restoration on the Gifford Pinchot National Forest.

## *Framing Question*

This document is designed to address the following question: Where have the Partners achieved consensus around desired future conditions and the range of management actions necessary to achieve these conditions?

## *Comprehensive Decision Making*

The Partners are committed to using a comprehensive decision making process that considers the best available science and ecological, economic, and social values. As new and better science becomes available, the Pinchot Partners remain open to updating our positions and this document accordingly.

## *Pinchot Partners Work with the Forest Service*

The Pinchot Partners are an advisory group that works with the Forest Service. As a microcosm of the broader public, their role is to make recommendations to the Forest Service, suggest improvements and consider innovative new Ideas. They endeavor to reach consensus, as much as possible, when planning watershed level vegetation treatments to improve forest health. The Partners are also considerably involved in making recommendations for a wide range of restoration projects through the use of funds generated from stewardship sales and retained receipts.

## *Living Document*

This document is intended to be a living document that is reviewed annually (at a minimum), and updated as necessary to reflect current priorities, community values, projects, and best available science. This document does not reflect the full range of the collaborative's projects and involvement on the Forest.

# Our Position on Managing Forest Roads (approved 11.18.20)

---

## *Preserve the benefits, reduce the impacts*

Roads on the Gifford Pinchot National Forest are a contentious and complex issue, and for good reason. Roads deliver both benefits to users and threats to forest health. The Pinchot Partners support efforts to preserve road benefits while preventing or reducing their impacts.

**Preserve road benefits:**

- Access to timber and special forest products that help support local economies and fund restoration activities
- Recreation opportunities for local residents and tourists
- Fire control, emergency response, and forest management activities
- Opportunities for corridors for some wildlife movement

**Prevent or reduce potential impacts:**

- Degraded water quality and aquatic habitat from sedimentation, debris slides, clogged culverts, etc.
- Habitat fragmentation which can decrease biodiversity and increase predation
- Dispersal of invasive species, pathogens, and chemicals
- Human despoilment such as trash dumping, lost solitude, loss of soil productivity, use conflicts and roadkills

## *Our support*

The Pinchot Partners collaborate with the Cowlitz Valley Ranger District and other partners on the Gifford Pinchot National Forest and surrounding areas to promote policies and projects that create quality local jobs, recreational opportunities, and benefit watershed health. To help maintain a forest road system that delivers value for users and protection for watersheds, we recommend:

- Increasing quality maintenance and improvements on maintained road
- Reducing road density where roads are not needed or pose outsized environmental risks

- Supporting restoration efforts with advocacy, funding, volunteers and collaboration with partners

The following pages outline the specific actions we support to achieve our goals. For areas where the Partners disagree about positions or tactics, we present differing viewpoints.

## *Increasing Quality Maintenance*

### Limited funds call for prioritization and efficient planning.

The Gifford Pinchot National Forest does not have funding or capacity to maintain its current road system. In recent years, roads have failed across the forest due to weather events and lack of maintenance. The road maintenance backlog on the Gifford Pinchot National Forest is roughly estimated at $50 million and growing. This backlog has led to an increasing number of major road access problems as well as degraded fish and wildlife habitat.

### Blueprint for prioritizing

Given limited resources, the Pinchot Partners would like to see investments in maintenance prioritized for important access routes. To this end, the Pinchot Partners encourage the Gifford Pinchot National Forest to use current Forest Service *Travel Management Directives*[3] as a guide for focusing funds on roads necessary for future and continued safe access. Using a science-based analysis of all motorized roads and trails on the forest, these directives identify a minimum system of routes necessary for the "administration, utilization, and protection" of the forest.

### Restoration planning

While quality, ongoing maintenance can help alleviate future threats to watershed health, we encourage the Gifford Pinchot National Forest to conduct comprehensive watershed restoration activities as well. To increase planning efficiencies, restoration, maintenance and road use should be evaluated when thinning and/or harvest activities are planned. Dollars for planning and implementation can be leveraged from a variety of sources including appropriated dollars (Legacy Roads Program),

[3] Forest Service Travel Management Directive

stewardship authorities, capital improvement fund requests, and grant funding.

## *Reducing Density*

### Balancing ecological, economic and recreational value

To reduce the harmful effects of the forest's sprawling network of roads, The Pinchot Partners recommend a combination of activities including road decommissioning, closure and stabilization, and limited new construction and reconstruction.

### Decommissioning

Road decommissioning includes activities that result in the stabilization and restoration of unneeded roads to a more natural state (36 CFR 212.1). We believe that road decommissioning should be focused on roads that have adverse environmental impacts and limited access needs.

Criteria to consider for road decommissioning:

- Watershed risk
- Identified uses and reasonably foreseeable future management or need
- Recreation access value

Decommissioning can include:

- Eliminating the road from the GPNF database of system roads because the road has effectively closed itself and is no longer needed in the future
- Pulling and or upgrading culverts and stabilizing aquatic and terrestrial risks with entrance closure
- Full topographic restoration, where cost benefit analysis makes it a reasonable expense

### Closing and stabilizing

Closing and stabilizing roads should be focused on roads not needed for current use and management of Forest Service lands, but may be needed in the foreseeable future. Treatments are conducted to prevent ongoing or future resource damage and eliminate the need for further maintenance. We recommend that for any road closure, a stub of closed road remain available (20-30') for parking and dispersed

camping.

Criteria to consider for closing and stabilizing:

- Watershed risk
- Recreation access value
- Identified uses within the foreseeable future

Closing and stabilizing can include:

- Blocking vehicular traffic
- Comprehensive watershed restoration

### Limiting new construction

The Pinchot Partners believe it is possible for the Forest Service to do most forest management activities without extensive new construction or reconstruction of roads open to motorized public access (Level 2 through 5 roads). In some site-specific cases, however, it may be necessary to keep the environmental impacts of these roads within legal and policy thresholds. Over the long term, such maintenance/reconstruction results in a net reduction of open-road impacts.

### Minimizing temporary construction

We encourage the Forest Service to minimize construction of temporary roads. Temporary roads should be located where past logging roads were located, unless a new location would cause less resource effect or where no past logging roads or landings were used to harvest the unit. For each harvest, Gifford Pinchot National Forest should do an analysis that illuminates the rationale and benefits associated with temporary road construction.

**A cost-benefit analysis for harvest roads:**

- How many acres are treated by each road segment?
- What are the advantages of road access over other harvest options?
- What is the economic or ecological value of the proposed harvest/treatment area?

**Ways to keep harmful impacts to a minimum:**

- Spot rocking on temporary roads and landings applied only where needed to reduce erosion, puddling and compaction
- All temporary roads should be securely closed to motorized traffic after timber sale operations
- De-compaction of temporary roads will encompass the entire landing and the sight distance from the beginning of the road (at least 200 feet). The rest of the road will have drainage reestablished and side cast removed if recommended. Logging slash, if enough available, will be placed on the de-compacted surface, otherwise exposed soils will be seeded and mulched.
- We recognize that this may increase the potential for less revenue or no bid projects; we encourage the FS to balance this impact to revenue with ecological concerns.

### *New Construction: Two Points of View*

The Pinchot Partners have differing views on construction of new temporary and permanent roads. New temporary roads are generally required for access to harvestable timber stands. New permanent roads may be required to re-route a problem section or accommodate increased public traffic.

1. **Conduct a disturbance analysis.** Some Pinchot Partners board members suggest that the Cowlitz Valley Ranger District should consider decommissioning a target range of roads for each planned harvest or treatment area. For example, if a project proposes 10 miles of disturbance, i.e., temporary road construction, the Forest Service should aim for decommissioning 5 miles of unneeded roads, specifically roads that are more impactful and causing problems (not popular and well-used local roads). Therefore, instead of a like-for- like analysis, it becomes a disturbance analysis. These members understand that some situations may require additional road length of new road to meet safety and ecological goals when replacing portions of a system road.
2. **A project-based approach.** Other board members share the perspective that the Cowlitz Valley Ranger District and the Gifford Pinchot National Forest, when conducting an Environmental Analysis for a project area should inventory and fully assess all existing roads in the project area. Roads should be assessed for location, condition including impacts to aquatic and wildlife resources, recreational

needs/opportunities, management needs, wildfire suppression needs, and long-term budget expectations. This information should be used to make determinations on the future status of each road segment. That status should include Maintenance Level (1-5) including storage or decommissioning needs. The metrics used for each road segment decision should be clear and understandable to the general public that use the Gifford Pinchot National Forest. Presentation of this information and status decision could be displayed in a tabular format with supporting documentation within the Environmental Assessment or its appendices.

## *Our Support*

### Advocacy and collaboration can help fill funding and resource gaps

The Pinchot Partners recognize that the Forest Service may be limited in its ability to impact some policy and resource decisions. Additionally, it may not lobby within itself or for greater funding nationally. Here are ways we can help the Forest Service implement suggestions we've made:

1. **Advocacy for increased funding levels, or specific funding for specific projects.** We anticipate spending additional time to understand the budgetary needs associated with road maintenance and reconstruction. We would like to better understand how the Forest writes its budget requests, the process for review, and the financial distribution after budget approval. We are interested in learning how fire budgets affect annual on-forest roads maintenance budgets.

2. **Media and community outreach to help facilitate increased public understanding and buy-in to Forest Service decisions.** We propose to work within our group to identify, develop, and present educational topics specific to the Gifford Pinchot National Forest and the Cowlitz Valley Ranger District. Utilizing the varying skill sets in our group, we believe that we can improve the communication between Forest and community meaningfully.

   Specifically, we are considering methods to transmit information about how, what, and why the Cowlitz Valley does some things, and to explicitly advocate in line with the Pinchot Partners adopted position statements.

3. **Data gathering to help answer road related questions.** The Pinchot Partners bring many diverse voices to the table. Through these partnerships, the Pinchot Partners may leverage volunteers, employees, grants, or other tools. Activities could include trail maintenance, trail data collection, visual documentation through electronic media, culvert data collection, invasive plants documentation, and other activities for which the Forest Service does not have adequate staff or budget to collect data to a granular level.

## *Resources*

### Terminology

**Temporary Roads** are needed for access with all logging systems (e.g., ground-based, skyline, and helicopter) where system roads are not present. Temporary roads are not system roads and are not intended for public access. Temporary road and landing design/maintenance are determined through an agreement between the Forest Service and the Contractor, and must comply with NEPA. An existing road grade is used when possible. Typically, the operator identifies a desired location for the temporary road and the Forest Service decides whether the site is appropriate or an alternate route is needed. Temporary roads should ideally be constructed and obliterated in the same operating season. They may be reopened if there is a need to go back for future treatment (e.g., 50 years).

**Road Obliteration** refers to what is done to a temporary road to make it inaccessible/unusable by the public after a timber sale. The primary objectives for obliterating a temporary road are (1) no future use/no vehicle access and (2) fluff and restore soils after a sale. The term, “closed,” is not used with obliterated temporary roads because these are not system roads.

**Road Decommissioning** refers to taking a system road off the map completely. How decommissioning is implemented and looks on the ground depends on the road’s condition (e.g., might require obliteration or minor physical alteration if vegetation is already growing back). In some cases, a closed Level 1 road may look the same as a decommissioned road: the difference is that the former remains in the system with an assigned number, while the latter is not in the system.

**Road Prism**

Refers to the width bounded by the top of the road cut slope on one side and the toe of the road fill on the other side.

# Our Position on Invasive Plant Management (approved 9.16.20)

---

## *Prevention, control, and removal of invasive species are vital to maintaining forest health*

Invasive species pose a significant threat to the health of the Gifford Pinchot National Forest's forests, lakes, and rivers. Invasive species can:

- displace native plants;
- reduce wildlife habitat and forage;
- impact threatened, endangered, and sensitive species;
- increase soil erosion; reduce water quality; and
- reduce soil productivity.

In addition, invasive species spread easily and rapidly, making control very difficult. Invasive species must be eradicated or controlled in order to maintain healthy ecosystems and native fish, plant, and wildlife populations. Highly conservative estimates show 30,000 acres of Gifford Pinchot National Forest lands infested with at least 35 invasive plant species. We encourage the Gifford Pinchot National Forest to incorporate pre- and post-treatment plans for addressing invasive plant species control into project design. Adherence to best management practices for prevention of invasive species spread and removal of established invasive plant species should both be of high priority in active management and project design.

## *Our Support*

The Pinchot Partners have a long history of involvement in invasive species management in the Gifford Pinchot National Forest, funded through the retained receipts program. Retained receipts have allowed the Pinchot Partners and Gifford Pinchot National Forest to collaborate on invasive species removal as well as contribute funds to the Mt. Adams Ranger District for invasive species removal. Numerous volunteer events since the inception of the group in 2003 have focused on invasive species removal. Our annual partnership with the White Pass School District's Discovery Team provides over 20 temporary jobs for local high school students, totaling hundreds of man hours of invasive species removal each summer.

## *Prevention of Invasive Plant Species Spread*

The Partners recognize that prevention of invasive species can mitigate harmful ecological impacts caused by both the presence of invasive species and by removal methods. We encourage the Forest Service to consider focusing prevention efforts on disturbed areas as common introduction routes and spreading sites for invasive species, including roads and recent harvest sites.

Roads are a common route of introduction and spread for many pernicious invasive species, including permanent or temporary FS roads and County roads that cut through the forest. We encourage the FS to monitor the status of invasive plant species near roadways and consider restrictions of OHV use in areas with high invasive prevalence.

Recent harvest sites also present a possible and likely introduction route for invasive plant species. We encourage the FS to follow best management practices for inspection and cleaning of equipment prior to entering and/or leaving a harvest site. Where contractors are used, the FS should ensure that all contractors are aware of and following best practices for inspection and cleaning of equipment based on seed/clipping size. We also encourage the Forest Service to engage in and enforce a system for documenting inspections.

## *Control & Removal of Present Invasive Plant Species*

Of similar high-priority need is the control and removal of invasive species that are already present, particularly high threat plant species such as holly, canary reed grass, knotweed, and scotch broom. We encourage the Forest Service to consider non-herbicide and herbicide management strategies, when it is ecologically necessary to use herbicides. There are concerns of herbicide use and its aquatic impacts in riparian reserves which often have a prevalence of invasives. Management strategies that minimize the ecological impacts of invasive treatments should be incorporated in project design. The Partners support inclusion of signage educating recreational users about common invasive plants and encouraging them to get seed of clothes & shoes before leaving sites, as well as boot brushes at trailheads.

## *Best Management Practices*

The Pinchot Partners encourages and supports the Forest Service in following the most up to date best management practices regarding invasive plant species, including but not limited to the following:

- Inventory of invasive species when developing plans for management activities and assess extent of invasive species on or near project sites by scouting, locating, and documenting infestations [4]
- Develop response and control plans to treat infestations when found
- Require all contractors to follow established best management practices
- Limit the potential introduction and spread of invasive species during the planning phase of each project
- Properly dispose of soil, seeds, plant parts, or invertebrate found during inspection and cleaning
- Leaving logging debris in place, where appropriate, to enhance soil conditions and decrease likelihood of invasive species taking hold and spreading [5]
- Consider response of invasive species to land management activities that result in disturbances
- Best practices as outlined in the chart below [6]

[4] "Best Management Practices (BMPs) to Prevent the Introduction and Spread of Invasive Species"
[5] "Logging Debris Matters: Better Soil, Fewer Invasive Plants"
[6] "Proposed BMPs for Invasive Plant Mitigation during Timber Harvesting Operations"

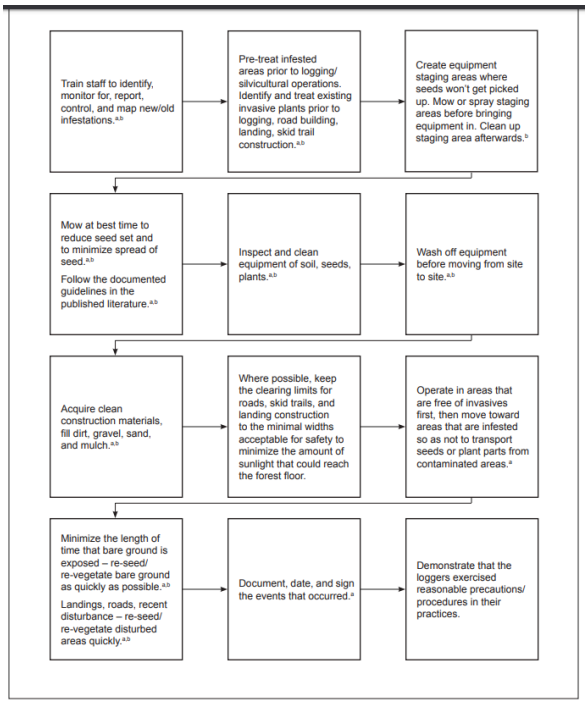


Figure 1.—Flow diagram of proposed voluntary BMPs for invasive species mitigation during harvest operations ([a]Invasive Plant Council of BC 2007, [b]Kearns and Chapin 2008, LeDoux 2011).

## *Our Support*

### Advocacy and collaboration can help fill funding and resource gaps

As mentioned, the Pinchot Partners have been and continue to be committed to engaging in collaborative efforts to mitigate the impact of invasive species within the Gifford Pinchot National Forest. We recognize that funding and resources from the Forest Service are limited. Updated mapping and monitoring of invasive plant species would be helpful in treating new infestations when they are small and before they become established. The Pinchot Partners can assist the Forest Service by providing data on locations of invasive species by using volunteers or student field work projects. The Pinchot Partners are able and willing to provide the following support in partnership with the Forest Service and other agencies:

- Locating and securing financial resources from existing agencies to assist in invasive species mapping, location, monitoring, control and/or removal
- Coordinating efforts on the ground with volunteers, tribal members, and rural job preparedness programs
- Engage in education, community outreach opportunities, gardening with invasives

- Assisting the Forest Service in amplifying success stories of invasive species treatment and removal
- Pursuing innovative ways to manage invasive species with consideration to creating markets with incentives for removal

# Our Position on Timber Sales (approved 6.16.20)

---

## *The Partners advocate for a mix of sale types with emphasis on restoration.*

Timber sales on National Forests generate revenues that are used in a number of ways. How and where revenues can be used depends on the type of timber sale that generated them.

In recent years, the Cowlitz Valley Ranger District has offered three different types of timber sales: traditional, stewardship, and Good Neighbor Authority (GNA). These sale types will be described in the following pages.

The Pinchot Partners recognize the value in each type of sale and support a balance of each kind, depending on the conditions of the harvest site, size of the potential harvest, and opportunities for restoration projects. Whenever feasible, we favor an emphasis on stewardship sales, described in greater detail below. Much of the work that we advocate for happens within stewardship contracts, which are dedicated to forest restoration work where any excess revenues are reinvested into the forest where they occur.

## *Three Types of Timber Sales*

This section outlines the various types of timber sales, the general purpose of each type, how and where funds can be spent, and what (if any) restrictions exist for spending them.

### 1. Traditional Sales

***General Purpose***

A traditional timber sale involves the sale of commercial forest products with funds returning to the U.S. Treasury. Sales are packaged and released through a bidding process.

***How and Where Funds Can Be Spent***

*Forest Service revenue goes back to the U.S. Treasury and is then distributed to counties to fund a portion of various public services*

Counties receive a portion of the receipts retained from Forest Service revenue (including but not limited to timber sales, recreation and special use permits, and more) through the Secure Rural Schools and Community Self Determination Act of 2000, and later permanent authorization of the 2014 Farm Bill, to help maintain local roads and schools. Payments are divided into three distinct categories, or Titles:

- Title I[7] for roads and schools;
    - Counties generally receive the majority of Secure Rural Schools funds under Title I, which is designated for the benefit of public schools and public roads
- Title II[8] for projects on Federal lands;
    - Counties generally receive 20% or less of Secure Rural Schools funds under Title II, which are used by willing Federal agencies, State and local governments, private and nonprofit entities, and landowners for protection, restoration and enhancement of fish and wildlife habitat, and other natural resource objectives on Federal land and on non-Federal land where projects would benefit these resources on Federal land.
- Title III[9] for county projects to:
    - Carry out activities under the Firewise Communities program;
    - Reimburse the county for search and rescue, firefighting, and law enforcement patrols;
    - Cover training costs and equipment purchases directly related to emergency services;
    - Develop and carry out community wildfire protection plans

While it is not clear whether timber sale receipts in particular go specifically to these titles, it's important to note that receipts from many types of Forest Service revenue generation are returned to counties through titles, including recreation and special use permits.

[7] https://www.fs.usda.gov/working-with-us/states/secure-rural-schools/title-1
[8] https://www.fs.usda.gov/working-with-us/states/secure-rural-schools/title-2
[9] https://www.fs.usda.gov/working-with-us/states/secure-rural-schools/title-3

## 2. Stewardship Contracts

***General Purpose***

Stewardship Contracts are contracts by the Forest Service for services such as young stand thinning, (also known as pre-commercial thinning)[10]; trail maintenance; and fuel reduction[11] in which some of the costs may be offset by the value of vegetative material removed and may not return revenues to the U.S. Treasury. In addition, any excess receipts could be used for other stewardship contracts. Stewardship contracting includes natural resource management practices seeking to promote a closer working relationship with local communities in a broad range of activities that improve land conditions. These projects shift the focus of federal forest management towards a desired future resource condition. They also provide a way for federal agencies to contribute to the development of sustainable rural communities, restore and maintain healthy forest ecosystems, and provide a continuing source of local income and employment[12]. Stewardship contracting provides a way to:

- Accomplish multiple projects;
- Package opportunities;
- Collaborate with communities;
- Focus on the end result

Section 604 (16 USC 6591c) of Public Law 108-148 as amended by Section 8205 of Public Law 113-79, the Agricultural Act of 2014[13] grants the Forest Service permanent authority to enter into stewardship contracts or agreements to achieve land management goals for public lands that meet local and rural community needs. Some of the features of the authorizing legislation includes allowing Forest Service to apply the value of timber or other forest products removed as an offset against the cost of services received, apply excess receipts from a project to other authorized stewardship projects, select contracts and agreements on a "best value" basis, and award a contract or agreement up to ten years which may stimulate long term investment in the local community. Stewardship contracts may be used for treatments to improve, maintain, or restore forest or rangeland health; restore or

[10] See Resources, pg. 25 for further explanation
[11] See Resources, pg. 25 for further explanation
[12] https://www.fs.fed.us/restoration/Stewardship_Contracting/overview.shtml
[13] https://www.fs.fed.us/restoration/Stewardship_Contracting/section604.shtml

maintain water quality; improve fish and wildlife habitat; and reduce hazardous fuels that pose risks to communities and ecosystem values.

***How and Where Funds Can Be Spent***

*Money goes back to the Forest Service project area and can only be used for restoration work*

The exchange of goods for services must implement on-the-ground projects with key goals such as:

- Road and trail maintenance or obliteration to restore water quality;
- Soil productivity, habitat for wildlife and fisheries, or other resource values;
- Setting of prescribed fires to improve composition, structure, condition, and health of forest stands or improve wildlife habitat;
- Removing vegetation or other activities to promote healthy forest stands, reduce fire hazards, or achieve other land management objectives;
- Watershed restoration and maintenance;
- Restoration and maintenance of wildlife and fish habitat; and
- Control of noxious and exotic weeds and reestablishing native plant species.

Restrictions on stewardship contracting funds include:

- No more than 15% on administrative costs (in support of project)
- Construction of administrative buildings or major developed recreation facilities;
- Research;
- Land acquisition.

In cases where the value of the goods is greater than the costs of the services, the Forest Service collects and retains the excess receipts. These retained receipts may be used to implement other stewardship contracts or agreements[14]. Unlike traditional timber sales, counties *do not* receive a portion of the receipts returned to the Forest Service through stewardship sales. However, recent research suggests that although money does not flow back to the counties directly, money generated by stewardship contracts does flow back into the local economy. Dr. Jean Daniels (US

[14] https://www.fs.fed.us/restoration/documents/stewardship/stewardship_brochure.pdf

Forest Service) and Dr. Max Neilson-Pincus (Portland State University) have shown through recent economic analysis of the Gifford Pinchot National Forest stewardship contracting program that nearly 75% of all stewardship expenses are spent in the counties that cover 99% of the Gifford Pinchot National Forest., accounting for an additional $8.5 million to the local economy.[15]

## 3. Good Neighbor Authority (GNA) Sales

***General Purpose***

The Good Neighbor Authority (GNA) is a type of stewardship sale consisting of an agreement between The Washington State Department of Natural Resources (DNR) and the Forest Service to increase the pace and scale of forest health treatments and restoration projects in forests across Washington state. A GNA agreement can provide opportunities to:

- Reduce hazardous fuels that contribute to increased wildfire risk;
- Increase forest resilience to insects and disease;
- Accelerate habitat restoration efforts;
- Increase coordination and planning through state and federal partnerships;
- Increase economic opportunities in rural communities near forests

The GNA was authorized permanently by Congress in the 2014 Farm Bill to allow state agencies to enter into agreements with the Forest Service. The GNA authorizes the state to act as a trusted agent of the federal government to accomplish a variety of forest, range, and watershed restoration services in national forests with the additional benefit of using state processes, which are sometimes more efficient, to carry out those projects[16].

The Pinchot Partners played a key role in the funding and planning of the 2018 Wake GNA timber sale in the southernmost portion of the Cowlitz Valley Ranger District in Skamania County.

***How and Where Funds Can Be Spent***

[15] *"Economic Benefits of Stewardship Contracting Program,"* Research presentation by Dr. Jean Daniels, Dr. Max Nielsen-Pincus to Pinchot Partners board on January 20, 2021

[16] https://www.dnr.wa.gov/sites/default/files/publications/rp_2020_gna_summary.pdf

*Money from sale goes to the state and is held in trust for restoration projects within that National Forest.*

Because the Good Neighbor Authority is a new process in Washington, there are still some questions about where the funding goes and how it can be used. The Washington DNR has one pot of money held in account for the entire state with the expectation that it will be portioned out to forests where projects took place.

## *Our Support*

### Early, ongoing involvement with CVRD partners

The type of timber sale to be offered on a new project is generally considered in the early planning stages by CRVD staff. To provide our point of view and support for restoration opportunities, we communicate regularly with CRVD personnel.

- Currently, at least one representative of the Pinchot Partners attends monthly Forest Service interdisciplinary team meetings as a guest observer. We are grateful for this invitation, and request that it continues.
- We also request early and often communication from Forest Service staff on what types of sales are being considered for particular projects.
- The Partners would like the opportunity to meet with the timber program and pre-sales foresters on a biennial basis or as appropriate to give feedback on sale areas & boundaries as those decisions are made.
- We would also like the ability to suggest project ideas and provide feedback as to the viability of stewardship items and GNA-program revenue projects to ensure proposal feasibility and cost efficiency.

## *Resources*

### Terminology

**Young stand thinning, formerly known as pre-commercial thinning:** Precommercial thinning is the removal of trees not for immediate financial return but to reduce stocking to concentrate growth on the more desirable trees - synonym respacing, thinning-to-waste.[17]

[17] The Dictionary of Forestry," edited by John A. Helms

**Fuel reduction:** treatments that include removing accumulated vegetation to lessen severe impacts or damage of wildfires. Fuel reduction projects and treatments have been proven as a means of lessening wildfire hazards, catastrophic crown fires, threats to public and firefighter safety, and damage to property.

# Our Position on Monitoring (approved 11.17.21)

---

**Note:**

*While researching and discussing monitoring, the Position Statement Committee realized that monitoring can be discussed at many different levels and approached from many different perspectives. For example, one aspect of monitoring includes contract enforcement and ensuring compliance for active timber sales. Another aspect of monitoring includes the tracking of progress toward stewardship and restoration goals. For the purpose of this document and ensuring efficient use of limited resources and capacity, we will focus on the latter in this document but we recognize that contract enforcement and ensuring compliance is also an important element for the overall picture provided for by authorized Forest Service staff.*

## *Monitoring is essential for any vegetation management process.*

***"Are fish healthier when logs are placed in streams?"***
***"Can huckleberry yields be increased by opening the forest canopy?"***
***"Are silvicultural prescriptions really supporting forest health and other desired objectives?"***

Definitive answers to questions about natural resource management are often difficult to come by, but can only be found by observing and tracking what is actually occurring "on the ground." Monitoring at multiple levels is vital to ensuring that stated goals and objectives are being met, and that adaptive management strategies are actually accomplishing what they set out to do. Because we are committed to forest health, we support the Cowlitz Valley Ranger District in its monitoring responsibilities.

## *Forest Service Monitoring Basics*

### Forest Plans shape the monitoring environment on the Gifford Pinchot.

Two Forest Plans, the Northwest Forest Plan and the Gifford Pinchot Forest Plan provide the primary direction for resource management actions and results

monitoring on the Gifford Pinchot.

## The Northwest Forest Plan

Additionally, the 1997 Northwest Forest Plan[18] outlines monitoring guidelines for federal land within Oregon and Washington. According to the Regional Ecosystem Office, which provides support to the interagency management of the Northwest Forest Plan:

"The goal of the regional monitoring program is to evaluate the effectiveness of the Northwest Forest Plan in achieving its management objectives on federal lands in the planning area. Monitoring focuses on important regional scale questions about older forests, populations and habitat of northern spotted owls and marbled murrelets, watershed health, federal agency relationships with Indian tribes, and socioeconomic conditions in communities closely tied to federal lands.[19]"

## The Gifford Pinchot Forest Plan

The 1976 National Forest Management Act (NMFA) requires each National Forest to establish a Land and Resource Management Plan, also known as a Forest Plan. The Gifford Pinchot Forest Plan, originally published in 1990, and amended most recently in 2016 "guides all natural resource management activities and establishes management Standards/Guidelines for the Gifford Pinchot National Forest. It describes resource management practices, levels of resource production and management, and the availability and suitability of lands for resource management.[20]"

The most recent 2016 update to the Forest Plan monitoring program came in response to a 2012 update to 36 CFR 219, also known as "the planning rule," to ensure compliance with new planning rule requirements.

Generally, monitoring is required to evaluate resource management implemented, considering the general direction set out in the Forest Plan, and includes long-term

[18] Northwest Forest Plan
[19] Northwest Forest Plan Interagency Regional Monitoring Program
[20] GPNF Land and Resource Management Plan, 1990

monitoring to ensure that methods are effective in reaching desired future conditions; in other words, these monitoring efforts seek to answer questions like "Is the Forest Service managing the forest the way that's intended?" and "Is the Forest Service implementing treatments and prescriptions to move the forest toward those desired future conditions?"

The updated monitoring portion of the GPNF Forest Plan includes guidelines in 8 different categories:

- Forest Plan Goals/Desired Condition;
- Evaluation Question(s);
- Type of Monitoring (implementation and/or effectiveness)
- Monitoring Indicators;
- Sampling Methods & Data Collections; and
- Responsibility

### Types and levels of monitoring

Generally, the US Forest Service employs several types of monitoring at several levels.

***Types of monitoring include:***

- **Implementation monitoring** which assesses whether a management action has been performed as designed, answering the question "*Was the action performed as designed?*"
- **Effectiveness monitoring** which assesses whether an action has achieved the objective set for it, answering the question *"Did the action achieve its goals?"*[21]

***Levels of monitoring include:***

- **Project level monitoring** occurs while the project is being implemented. This type of monitoring is dependent on the project, and can be heavily technical answering such questions as *"Are the prescribed number of trees left standing near the creek?"*
- **Program level monitoring** within the Forest Service tends to be "bigger picture," addressing how actions affect the forest at a landscape level and answering questions such as "*Are current prescriptions and treatments*

[21] Ecological Forest Management, Franklin, Johnson, & Johnson, 2018

*meeting the management direction set out for the forest?*" as outlined in forest-specific and regional forest plans.

## *Our Monitoring Expectations*

### Monitoring in accordance with Forest Plan Requirements

The Pinchot Partners expect the Forest Service to appropriately monitor all categories that are legally required and outlined in the Northwest Forest Plan and the Gifford Pinchot Forest Plan.

The following are legally required to be monitored according to the Northwest Forest Plan[22]:

- A specified list of survey and managed species, including bryophytes, lichens, fungi, great gray owl, red tree vole, amphibians, snails, slugs, and vascular plants
- Marbled murrelet population and habitat trends
- Northern spotted owl habitat
- Late successional and old growth forests[23]
- Socioeconomic conditions
- Tribal-Federal relationships
- Watershed conditions

As of January 2016, the updated GPNF monitoring program[24] includes 26 items to be monitored under 9 broad categories:

- Recreation
- Cultural resources
- Native American coordination
- Wildlife & fish populations
- Timber
- Soils & watershed conditions
- Transportation
- Resource Outputs

[22] The Northwest Forest Plan Interagency Regional Monitoring Program
[23] Including smaller stands of old growth within younger stands of trees
[24] Gifford Pinchot National Forest Plan Monitoring Program, January 2016

### Transparency and clear communication

Where this required monitoring has been completed, we request clear communication on the outcomes of monitoring efforts. Where monitoring was not accomplished, the Pinchot Partners expect clear communication on limitations and barriers so that we can understand capacity needs and funding gaps.

### Questions we may ask

To ensure that there are appropriate monitoring protocols at each phase of projects and/or sales., here are questions we may ask:

- ☐ Have measurable goals and objectives been set and clearly communicated for the project or program activity?
- ☐ Are monitoring protocols based on these preliminary goals and objectives?
- ☐ Before a treatment or activity begins, is a monitoring plan in place and have monitoring activities been initiated?
- ☐ While the treatment or activity is occurring, is it being monitored to assess whether it is being implemented the way it was planned, and whether the objectives are being met.
- ☐ Post-treatment or activity, is monitoring taking place to determine the success of the project, whether the intended effect was achieved, and lessons learned that can be applied to future projects?
- ☐ Does the CVRD/GPNF have adequate funds to get staff on the ground to do the monitoring required or established in prescriptions?
- ☐ Are objectives and monitoring results being clearly and regularly communicated to surrounding communities, agencies and legislators?

## *Our support*

### Advocacy and collaboration can help fill funding and resource gaps

The Pinchot Partners are committed to collaborating with the Cowlitz Valley Ranger District and other partners to identify gaps in monitoring capacity, and working to secure funding and resources to assist in filling these gaps wherever possible.

We have a strong track record of supporting monitoring efforts in collaboration with the Forest Service and other partner groups. For example, our partners in the Cowlitz

Indian Tribe have been engaged in huckleberry monitoring efforts since our early years, and were instrumental in drafting a comprehensive huckleberry management strategy in 2017.

In 2017, Cascade Forest Conservancy (CFC) also embarked on a monitoring project to try to answer some of the questions associated with huckleberry restoration. The CFC project team visited a total of 309 sites and measured variables such as fruiting, plant height, and distribution. The field efforts focused on treatment units and control plots. The overall project intended to encompass several years of data collection, so more fieldwork and analysis are needed before robust conclusions can be expected. The project team plans to have a final report completed by the end of 2023.

### Additional resources for priority interests

Beyond legally mandated monitoring requirements, the Pinchot Partners have identified the following monitoring categories and items from the Gifford Pinchot National Forest Plan Monitoring Program[25] that align with our interests and priorities:

- Monitoring Category (ii) - The status of select ecological conditions including key characteristics of terrestrial and aquatic ecosystems includes:
    - Providing for fish habitat (pg. 13)
- Monitoring Category (iii)— The status of focal species to assess the ecological conditions required under § 219.9 includes:
    - Habitat function & forest structure (pg. 18)
- Monitoring Category (vii) - Progress toward meeting the desired conditions and objectives in the plan, including for providing multiple use opportunities includes:
    - Protection of heritage resources & tribal consultation, specifically huckleberry (pg. 27)
    - Silvicultural practices (pg. 28)
    - Invasive Plants (pg. 31)
    - Transportation & Road Maintenance (pg. 36)
- Monitoring Category (viii)— The effects of each management system to determine that they do not substantially and permanently impair the productivity of the land (16 U.S.C. 1604(g)(3)(C)). (36 CFR 219.12(a) includes:

[25] Gifford Pinchot National Forest Plan Monitoring Program, January 2016

- Long term soil productivity (pg. 39)

# Our Position on Silvicultural Management Practices in Riparian Reserves (approved 10.19.22)

---

The Position Statement committee met in December 2021 to begin working on the following section dealing with silvicultural management in riparian reserve. Over the course of the next 6 months, it became clear that the committee and the Partners have more to learn about riparian reserves and the process the Forest Service uses to determine riparian reserve buffers, as well as what kind of management, if any, is permitted within the riparian reserve; what treatments have occurred in these areas in the past; and what direction forest leadership intends to take with regard to riparian reserve management in the future.

## *Our guiding questions and concerns*

- What treatments are allowed in riparian reserves?
- During proper functioning assessment, is the historical context considered, i.e. historic range of variability?
- Riparian reserves management outlined the Northwest Forest Plan may be outdated. Is there more current research available to guide appropriate prescriptions?
- What has been done in CVRD riparian reserves in the past, and what lessons were learned?
- Are treatments in riparian reserves being monitored? Are there benchmarks to evaluate at the beginning of experimental treatments?

As the position statement committee discussed riparian reserve management over the course of several months, it became apparent that:

1. Riparian reserve management is variable based on site-by-site conditions, therefore we cannot provide specific feedback or desired silvicultural treatments within this document.
2. We do not currently have the data or information necessary to provide meaningful and informed feedback about riparian reserve management on a site-specific basis.

Based on discussions over the course of our monthly subcommittee meetings and at our June 2022 field tour, the goal of this section shifted away from making recommendations, either broad or specific, about the kind of riparian management the Partners would like to see. Instead, what we've compiled is an effort to outline our general consensus on riparian reserve management and efforts to create a clear and direct information sharing conduit between the Partners and the Forest Service. Having a clear, two-way path for information to flow ensures that when site-specific questions about riparian reserve (and other management issues) come up, the Partners have access to appropriate data and relevant scientific literature in a timely manner so that we can provide meaningful and relevant feedback.

## *What are riparian reserves?*

As defined by the Northwest Forest Plan, riparian reserves include land along streams, wetlands, ponds, lakes, and unstable or potentially unstable areas where special standards and guidelines direct land use. Making up 11% of all federal land within the range of the Northern spotted owl, the purpose of establishing riparian reserves is "to protect the health of the aquatic system and its dependent species; the reserves also provide incidental benefits to upland species." Riparian reserves help to:

- Maintain and restore riparian structures and functions
- Benefit fish and riparian-dependent non-fish species,
- Enhance habitat conservation for organisms dependent on the transition zone between upslope and riparian areas,
- Improve travel and dispersal corridors for terrestrial animals and plants, and
- Provide for greater connectivity of late-successional forest habitat.[26]

## *How are riparian reserves managed?*

The Aquatic Conservation Strategy guides the management of riparian reserves. Determining riparian reserves occurs after all other land allocations are designated. Buffer widths as outlined by Appendix B6 of the Northwest Forest Plan are considered interim widths until watershed analysis can be completed. Specific widths are located in Table B6-2 on page B87 and reproduced below:

[26] Northwest Forest Plan Record of Decision

**Table B6-2.** Minimum widths of Riparian Reserves for fish-bearing, permanently flowing nonfish-bearing, and intermittent streams, expressed as whichever slope distance is greatest. In addition, Riparian Reserves must include the 100-year floodplain, inner gorge, and unstable and potentially unstable areas.

| Riparian Reserve Scenario | Stream Class | Tier 1 Key Watershed | Tier 2 Key Watershed | All Other Watersheds |
|---|---|---|---|---|
| Riparian Reserve 1 | Fish-bearing streams | Average height of two site-potential trees or 300 feet | Average height of two site-potential trees or 300 feet | Average height of two site-potential trees or 300 feet |
| Riparian Reserve 1 | Permanently flowing nonfish-bearing streams | Average height of one site-potential tree or 150 feet | Average height of one site-potential tree or 150 feet | Average height of one site-potential tree or 150 feet |
| Riparian Reserve 1 | Intermittent streams | Average height of one site-potential tree or 100 feet | Average height of one site-potential tree or 100 feet | Average height of one site-potential tree or 100 feet |
| Riparian Reserve 2 | Fish-bearing streams | Average height of two site-potential trees or 300 feet | Average height of two site-potential trees or 300 feet | Average height of two site-potential trees or 300 feet |
| Riparian Reserve 2 | Permanently flowing nonfish-bearing streams | Average height of one site-potential tree or 150 feet | Average height of one site-potential tree or 150 feet | Average height of one site-potential tree or 150 feet |
| Riparian Reserve 2 | Intermittent streams | Average height of one site-potential tree or 100 feet | Half the average height of one site-potential tree or 50 feet | Half the average height of one site-potential tree or 50 feet |
| Riparian Reserve 3 | Fish-bearing streams | Average height of two site-potential trees or 300 feet | Average height of two site-potential trees or 300 feet | Average height of two site-potential trees or 300 feet |
| Riparian Reserve 3 | Permanently flowing nonfish-bearing streams | Half the average height of one site-potential tree or 75 feet | Half the average height of one site-potential tree or 75 feet | Half the average height of one site-potential tree or 75 feet |
| Riparian Reserve 3 | Intermittent streams | One-sixth the average height of site-potential tree or 25 feet | One-sixth the average height of site-potential tree or 25 feet | One-sixth the average height of site-potential tree or 25 feet |

## *What actions do the Partners support?*

### Identify riparian reserves early in the NEPA analysis

The Partners support the identification and determination of riparian reserves early in the NEPA analysis process, so that proposed acres of treatment are not seemingly cut drastically later in the analysis. We recommend identifying where riparian reserves exist before proposing silvicultural treatments, rather than the other way around. The Partners see our involvement in the NEPA process as a crucial piece of the Forest Service's commitment to public involvement; without this ongoing opportunity to understand which stands or units were removed for treatment and why, our ability to give engaged and helpful feedback is severely marginalized. Please note that riparian reserves are also discussed in our zone of agreement on Road Management[27].

### Use the best available and most recent science

The Partners also support using the best available science in determining buffer width and managing riparian reserves. We encourage the CVRD to use a site specific approach, Option B, based on the corresponding 4 characteristics listed below:

“The options differ in how the riparian conservation area is partitioned between inner and outer zones. Option A uses a fixed-width approach to partition the zones. Option B uses a context-dependent approach based on four important characteristics of each stream reach—susceptibility to surface erosion, debris flows, thermal loading, and habitat potential for target fish species—to determine the appropriate width of

[27] Pinchot Partners Zones of Agreement: Road Management

the inner zone. Both options are limited to stands ≤80 years of age, and "tree-tipping" is used throughout the riparian conservation area to ensure that harvest does not negatively affect wood recruitment to the stream (Reeves, Pickard, Johnson, 2016)."

### Consider treatment alternatives to "no-cut" zones that support ecological health

It is our understanding that in the recent past, the CVRD has considered very little, if any, treatment within riparian reserves, in either the inner or outer zones. Research by Reeves, Packard, and Johnson (2016) supports that management in riparian zones, as appropriately identified by the criteria below, can be a reasonable option to achieve aquatic conservation strategy (ACS) goals in the inner riparian zone, and ACS goals as well as timber management goals in some outer riparian zones:

"Riparian reserves are divided into an inner and an outer zone; the inner zone is devoted solely to achieving goals of the ACS, while the outer zone would be managed to achieve ACS and other management goals, which could include timber production. If timber production is implemented in the outer zone, ecological forestry prescriptions with significant amounts of retention would guide harvesting activities (Reeves, Pickard, Johnson, 2016)."

## *Inner riparian zone*

We encourage the CVRD 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.

## *Outer riparian zone*

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.

As of September 2022, 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. The Partners will continue discussions in more detail on a site-specific basis. As the group learns more and

works through these conversations, this statement will be updated to reflect an additional level of detailed consensus or lack thereof.

### *How will the Pinchot Partners provide support?*

#### Create a mutually beneficial information sharing process with the Forest Service.

As the Position Statement committee's discussions around riparian reserve management evolved over several months, we realized that we need more information and that the Forest Service may have the information we need. We propose that we work with the Forest Service to establish a mutually beneficial information sharing process to ensure the flow of information and ensure that we can provide meaningful engagement around this and many other issues. Establishing this process will occur outside the scope of this document, but below represents the kind of information that the Partners would find helpful:

1. Clear communication on what has been done in riparian reserve in the past, what is in the planning pipeline, and what direction forest leadership has in mind for management within riparian reserve
2. Regular and consistent reports on the monitoring data being collected in select areas (i.e, what systems are meeting desired temperatures, etc.)
3. What research and science are forest leadership and specialists relying on to make decisions regarding management within riparian reserves?

As an example of what we envision as part of an information sharing process, the Partners see the annual meeting in February as a great opportunity to have a report-out on relevant monitoring data. With plenty of advance notice, Pinchot Partners can provide the Forest Service with 3 topics we've been discussing and make a request for the corresponding monitoring data to be shared at the annual meeting. This, along with other data-sharing opportunities on a quarterly basis, will allow the Partners to be more well-informed about the conditions on the forest, and provide better engagement and input.

#### Provide a synthesis of best available research on management in riparian reserves.

The Partners support the adaptive management concepts set forth in the Northwest and Gifford Pinchot Forest Plans. To that end, we propose a synthesis on the current scientific research on riparian management in similar ecosystems. This is an effort the Partners will begin, with the possibility of seeking outside expertise and assistance later in the process.

To reiterate, the purpose of both of these proposed initiatives is to provide us with a greater level of detail and context that will, in turn, allow us to provide the Forest Service with more useful and engaged feedback. We recognize that our current level of consensus is broad, with very little detail. As we move through these two proposed initiatives, we plan to come back to this document to include additional detail. The Partners also acknowledge that our ability to provide more detailed and useful feedback relies on the ability of the Forest Service to share relevant data and information in a timely and thorough manner.

### Education and Outreach

As we increase our own understanding of effective prescriptions in riparian reserves, we can use this knowledge to better inform the public on the issues at hand, and better communicate the collaborative success of the Forest Service. As of July 2022, the Partners will be bringing on a Communications Coordinator in August 2022, who will help immensely with this effort.

## *Moving forward*

At this point in our discussions, there is general consensus among the Partners that we would like to see the Forest Service move away from so-called “no-cut” zones within riparian reserves. However, we also recognize that as we move beyond a high-level overview into the site-specific project level, we will likely have partners who will not come to consensus on the level of acceptable management within outer and inner riparian reserves. As we move forward with a synthesis of available scientific research and a new process for information sharing, we anticipate that these discussions will uncover additional detail and new areas of contention among the Partners, and we plan to revisit this statement as our position and level of consensus evolves.

# Our Position on Recreation (Approved 11.15.23)

## Sustainability is key

As one of three stated priorities in our mission statement, recreation is both a blessing and a curse in the CVRD. Leveraged correctly, recreation can boost East Lewis County economies with much-needed tourism dollars. However, without careful management, it can have devastating effects on watershed health and threaten the special nature of the GPNF that attracts recreators in the first place. Cowlitz Valley communities and the Gifford Pinchot National Forest have recently experienced this issue over the last few years, with a surge of new outdoor recreators on trails and campgrounds in the Cowlitz Valley and surrounding areas.

The purpose of this Zone of Agreement is to document the key activities and actions that Pinchot Partners believes will promote sustainable recreation on the forest. The Pinchot Partners focus on promoting watershed health, creating quality local jobs, and encouraging sustainable recreation. However, we recognize that increased recreational use can impact watershed health.

This document details the consensus-based agreements of the Partners to address the environmental and social impacts of recreation. The intended audience of this document is the Gifford Pinchot National Forest. Pinchot Partners respectfully requests the Forest Service utilize these agreements in future recreation-related developments on National Forest System lands.

## What is sustainable recreation?

*How the Forest Service sees it.*

The USFS defines sustainable recreation as "an enjoyable way to be healthy, spiritual, and contribute to economic development while conserving resources for future generations[28]." In its document, "*Connecting People with America's Great Outdoors: A Framework for Sustainable Recreation*," the FS emphasizes three spheres of sustainability: social, economic, and environmental.

### Social

A growing catalog of research makes it clear that outdoor recreation holds numerous social and physical benefits including a greater sense of community and wellbeing;

[28] "Connecting People with America's Great Outdoors: A Framework for Sustainable Recreation,"

improved health and wellness outcomes; and appreciation and connection to nature and heritage.

### Economic

Although recreation and outdoor tourism can be a boon to the economy, it can also change the character and dynamic of small rural communities.

### Environmental

The efforts of attracting more recreational users to an area that is already struggling to keep up with current management and maintenance demands can overwhelm FS staff and volunteers, compounding environmental damage. For these reasons, the Pinchot Partners find consensus in directing our efforts toward responsible, appropriate management of current recreational resources.

## What We Envision

*Uplifting the standards*

The Partners and the communities we live and work within hold these places dear for many reasons. We have a vested interest in conserving the Gifford Pinchot National Forest due to the uniqueness and beauty of the Cowlitz Valley. Because of this deeply rooted sense of place, we desire to see the Gifford Pinchot National Forest uplifting the standards of recreation management beyond other forests, demonstrating a commitment to an ethic of care for the special places we all know and love. We strive to cultivate a strong sense of place and foster a responsible outdoor ethic that encourages sustainable recreation.

*Three primary areas of concern with a focus on watershed health*

We recognize our vision for recreation may be lofty and that there are significant challenges to achieve it. However, we are committed to building our understanding of the likelihood for its success by working with the GPNF to answer our questions and address our concerns. Throughout many conversations in 2022 and 2023, our concerns surrounding recreation can be distilled into three key themes:

- Capacity: including the balance of available resources and current use, Forest Service staffing levels, including adequate law enforcement to ensure compliance with rules and regulations, etc.
- Planning: including how strategic decisions are made regarding recreation maintenance, etc.
- Funding: including issues around hiring and retaining staff, federal funding opportunities, etc.

Under these key concerns, we identified that the impact of recreation on watershed health is where the nexus of recreation and our group's values exists.

During conversations with GPNF staff, we were made aware of the 2010 document, "Connecting People with America's Great Outdoors: A Framework for Sustainable Recreation." This framework document outlines ten areas of focus for the USFS. Seeing many of our concerns addressed in this Framework, we decided to use it to organize key issues in this position statement. While this framework is over a decade old, and comes from the national level, many of the questions posed below revolve around the central question of how the GPNF and the CVRD are integrating a robust framework for sustainable recreation into their work plans and scope of work.

### *Our Guiding Questions and Concerns*

Each heading below represents an area of focus, as outlined in the "*Connecting People With America's Great Outdoors*" Framework. Listed under each heading are guiding questions and/or concerns that the Partners have regarding this particular area of focus.

#### Restore and Adapt Recreation Settings

- The last few years have seen an influx of recreational users of all kinds on the forest. What resources does the Forest Service currently have available to manage recreation? What additional resources are required to sustainably manage recreation on the GPNF?
    - How does recreation management planning fit into the Forest's overall program of work?
    - Could recreation be folded into vegetation management projects during the NEPA planning phase? The Partners would appreciate a conversation around NEPA planning, and the tradeoffs of attaching recreation to vegetation management projects. We also request that we have input and opportunity to review and provide input on potential projects.
    - What plans, policies, and/or guiding frameworks is the CVRD following with regard to recreation management?
    - Does the CVRD maintain a list of specific sites where it is currently applying or plans to apply sustainable recreation management principles? Would suggestions from the Partners be helpful?

#### Forge Strategic Partnerships

- Which recreation interest groups is the CVRD currently working with and/or targeting for greater collaboration in the future?

- What specific challenges is the CVRD experiencing with current partnership processes? How are these being addressed in order to increase the CVRD's capacity to engage and support partners?
- Whenever possible, we encourage the Forest Service to incorporate partners who already engage in similar efforts (e.g., trail work and maintenance; trash clean up; sensitive planting efforts; invasive removal, etc.) into their plans to assess and address human waste issues to maximize efficiency. In order to do this, the FS should streamline its process of working with partners and organizations to ease undue burden on volunteers and maximize the work happening on the ground.

**Promote Citizen Stewardship**

- Is there an update on the process of developing this holistic program analysis model described in the Framework? If so, the Partners would like to hear more about the outcome of the evaluation.
- What resources does the Forest Service currently have available to manage recreation? What additional resources are required to sustainably manage recreation on the GPNF?
- Recreation funding is the first to be cut during lean times, even though outdoor recreation poses significant ecological and resource impacts. Knowing this, how can we advocate to maximize locally available funding for recreation?
- How will new funds be dedicated and prioritized? How can the Partners have input about where these funds are directed?
- What gaps currently exist, and how can the Partners be consistently informed of such gaps?
- The Partners encourage the Forest Service to leverage partnerships to creatively tackle more effective use and placement of educational signage and materials as related to outdoor ethics, responsible trail use, campsite selection, campground use, proper disposal of trash and human waste, preventing the spread of invasive species, etc.
- The Partners encourage the FS to leverage existing community groups that engage in stewardship education in an effort to prevent or reduce public behaviors that lead to the issues and resource impacts listed in the next section.

**Develop a Sustainable Financial Foundation**

- One barrier to adequately managing recreation is the difficulty of filling local job vacancies, which is compounded by a lack of local, affordable housing. What is the plan to address these challenges?

- Are there better ways to tap the local workforce in order to alleviate housing concerns and foster pride of place and longevity?
- Could the Partners assist with basic job application training to encourage local applicants?

**Develop Our [Forest Service] Workforce**

- We support cross-program training and certifications in order to encourage holistic approaches to recreation management and prevent siloing. Are there opportunities within the CVRD for such training?
- Would it be helpful for the Partners to leverage its partnerships to provide support in this area?

## Mitigating The Impacts of Increased Recreation

The Pinchot Partners as a group recognizes that increased recreational use without appropriate management is in direct conflict with our goals of promoting watershed health and community resilience. With growing demand on campgrounds, trail systems, and forest resources as a whole, more significant time & resources are required for appropriate management & maintenance of these areas.

The following impacts pose significant risk to the ecosystem; as such we developed the following list of concerns and a suite of guiding questions around those concerns. We also offer some preliminary recommendations to address these impacts. Keep in mind that we consider these a jumping off point for further discussions and conversations around these topics.

### *Trash*

Guiding Questions:

- Are there locations that need additional trash receptacles? If so, where are they?
- What resources are needed to provide and install additional trash receptacles/stations?
- What resources are needed to address larger dumping sites, such as vehicles, tires, etc.?
- What additional support do groups like the Gifford Pinchot Trash Force and Gambler 500 need to be successful?

Recommendations:

- The Pinchot Partners will encourage recreational users whenever possible to consider Leave No Trace principle number 3, "Dispose of Waste Properly."

- The Partners encourage the FS to survey local groups and agencies that already engage in this work, such as the Gifford Pinchot Trash Force and Gambler 500, to identify potential locations for additional trash stations and/or receptacles, and where proper trash receptacles are no longer in working order.

*Human Waste*

Guiding Questions:

- Where are additional bathroom facilities needed on the forest?
- What kind of education, outreach, and partnerships exist already with the FS?
- What considerations are taken into account with regard to proper placement of dispersed camping?

Recommendations:

- The Partners will encourage recreational users whenever possible to consider Leave No Trace principle number 3, "Dispose of Waste Properly."
- We encourage the FS to consider the proximity to waterways when evaluating dispersed campsites.
- Consider an emphasis on alternatives to port-o-potties, such as pit toilets, composting toilets, etc., where appropriate.

*Trail conditions leading to erosion*

Guiding questions:

- What data exist on trail conditions, and how are trails classified in terms of their level of both use and disrepair? If it exists, is that data ready to be leveraged when these big funding packages come from congress? This would maximize ability to go after this funding and be competitive at the national level.
- How is the FS prioritizing the maintenance of trails with significant damage in higher risk areas when funding arises?
- How is the FS leveraging existing partnerships to deal with these issues?
- What resources does the FS currently have and use to address trail conditions?

Recommendations:

- The Pinchot Partners and will encourage recreational users whenever possible to consider Leave No Trace principle number 2, "Travel and Camp on Durable Surfaces."

- We are interested in further dialogue to find the nexus of where and how the FS is currently working with volunteer groups and how we could assist in building and strengthening those relationships.
- The Partners will advocate for appropriate resources to ensure that routine annual trail maintenance occurs in order to prevent trails from falling into disrepair.
- For trails that are in disrepair, the Partners encourage the FS to prioritize addressing trail issues that are impacting waterways.
- We'd also like to dedicate time to build a deeper understanding of the sustainable trails planning process.

*Destruction of Sensitive Plants*

Guiding Question:

- Our understanding is that a large portion of recreational activity occurs in areas near waterways, which in turn, impacts riparian zones. Does the FS have data of the scale of impacts from high intensity recreation on riparian zones?
- Another area of concern is sensitive wildflowers in meadows. What signage and/or education and outreach efforts exist to notify people when they're in sensitive meadow environments?

Recommendations:

- The Partners will continue support for leveraging partnerships like volunteer planting and monitoring through Cascade Forest Conservancy.
- We also support collaborative and partnership-based impact mapping on high recreation riparian zones.
- The Partners encourage the FS to use tried and tested design features that minimize impact.
- We encourage the FS to focus efforts on riparian areas and explore relocating some dispersed camping sites near waterways where sensitive plants are present.

*Introduction of invasive species*

Guiding Questions:

- Where are signs and boot-brush stations currently? Are they visible?
- How is invasive best practices education being provided to the public? For example, during permitting, at trail heads, at the ranger station, etc.?

Recommendations:

- The Partners will continue support for leveraging partnerships like volunteer invasive removal through Cascade Forest Conservancy.

- We encourage the FS to use tried and tested design features that minimize spread of invasive species.
- The Partners encourage the FS to survey heavily used trails yearly with attention to new areas of invasive plants.

### *Increased risk of human-caused wildfire*

Guiding Questions:

- Should access to certain areas be restricted during extreme fire danger?
- What additional education needs to be conducted to reduce human-caused fire starts?
- What responsibility do concessionaires have to ensure that customers are following guidelines?
- What historical data exists on the ignition sources for past fires?
- How does the FS mitigate human caused fire impacts to forest resources, including timber, wildlife habitat, and water quality, etc.

Recommendations:

- The Partners will encourage recreational users whenever possible to consider Leave No Trace principle number 5, "Minimize Campfire Impacts."
- The Partners encourage the FS to leverage partnerships to offer additional Firewise training opportunities and seek available federal, state, and private funding to support additional community education and training events.

### *Loss of habitat and displacement of wildlife*

Guiding Question:

- To what extent is the FS considering the expansion of recreation areas and facilities?

Recommendations:

- The Partners maintain consensus that our priority in terms of recreation management is adequate management of recreation assets that currently exist. We encourage the FS to prioritize deferred maintenance needs over the development of new trails and campgrounds.
- If new recreation areas are to be developed, the Partners encourage the FS to focus them within previous or existing road and/or trail networks.

## Our Support

### *Funding*

The Pinchot Partners are committed to supporting a comprehensive recreation management plan on the CVRD. We are well aware that funding is nearly always an issue. Therefore, the Partners will provide letters of support to the CVRD for

congressional funding and/or partner grants to fill those gaps as needed. Additionally, the Pinchot Partners can leverage existing relationships with legislators to advocate for increased funding for recreation management at the federal level, including things such as enforcement; invasive species mitigation; trash and human waste removal; trail maintenance; etc.

### *Feedback*

The Partners request a conversation around NEPA planning to understand the tradeoffs of including recreation with vegetation management NEPA analyses. We also request that we are provided an opportunity to review and provide input on potential recreation-related projects, for example, the Sustainable Trails Plan. The Partners request consistent, regular opportunities to get more time with specialists. For example, a quarterly focus for specialists within our monthly meeting schedule.

### *Stewardship Education*

The Pinchot Partners are committed to leveraging partnerships to support and provide stewardship education opportunities to the local community. This can include:

- Workshops on responsible recreational use;
- Clean-up and/or trail maintenance events in partnership with local groups, like the Gifford Pinchot Trash Force, Washington Trails Association, Backcountry Horsemen, Lewis County Trails, etc.
- Community events focused on spreading awareness of recreation ethics, like the Leave No Trace spotlight weekend we co-hosted with Gifford Pinchot Trash Force in July 2023.

## Additional Resources:

A list of groups referenced here as well as others that engage in this work can be found on our website.

# Appendix A: Acronyms and Terminology

## *Acronyms*

CE: Categorical Exclusion (see terminology)

CFC: Cascade Forest Conservancy

CIT: Cowlitz Indian Tribe

CVRD: Cowlitz Valley Ranger District

DNR: Department of Natural Resources, specifically Washington state

EA: Environmental Assessment (see terminology)

EIS: Environmental Impact Statement (see terminology)

FS: Forest Service

GNA: Good Neighbor Authority

GPNF: Gifford Pinchot National Forest

MSHI: Mt. St. Helens Institute

NEPA: National Environmental Policy Act (see terminology)

## *Terminology*

**CE, Categorical Exclusion:** Under the NEPA process, a categorical exclusion is a class of actions that a Federal agency has determined, after review by the Council for Environmental Quality, do not individually or cumulatively have a significant effect on the human environment and for which, therefore, neither an environmental assessment nor an environmental impact statement is normally required. The use of categorical exclusions can reduce paperwork and save time and resources.[29]

**EA, Environmental Assessment:** The National Environmental Policy Act (NEPA) process begins when a federal agency develops a proposal to take a major federal action. The environmental review under NEPA can involve three different levels of analysis: Categorical Exclusion (CE), Environmental Assessment (EA), and Environmental Impact Statement (EIS). If a federal agency can determine that a CE does not apply to a proposed action, they may then prepare an EA. The EA determines whether or not a federal action has the potential to cause significant

[29] https://ceq.doe.gov/nepa-practice/categorical-exclusions.html#:~:text=A%20categorical%20exclusion%20(CE)%20is,impact%20statement%20is%20normally%20required.

environmental effects. Each federal agency has adopted its own NEPA procedures for the preparation of EAs.

Generally, the EA includes a brief discussion of the purpose and need for the proposed action; alternatives; the environmental impacts of the proposed action and alternatives; and a listing of agencies and persons consulted. If the agency determines that the action will not have significant environmental impacts, they will issue a Finding of No Significant Impact (FONSI). A FONSI is a document that presents the reasons why the agency has concluded that there are no significant environmental impacts projected to occur upon implementation of the action. If the EA determines that the environmental impacts of a proposed Federal action will be significant, an EIS is prepared.

**EIS, Environmental Impact Statement:** Under the NEPA process, Federal agencies prepare an Environmental Impact Statement if a proposed major federal action is determined to significantly affect the quality of the human environment. The regulatory requirements for an EIS are more detailed and rigorous than the requirements for an EA.[30]

**Fuel reduction:** treatments that include removing accumulated vegetation to lessen severe impacts or damage of wildfires. Fuel reduction projects and treatments have been proven as a means of lessening wildfire hazards, catastrophic crown fires, threats to public and firefighter safety, and damage to property.

**NEPA, National Environmental Policy Act:** Signed into law on January 1, 1970, NEPA requires federal agencies to assess the environmental effects of their proposed actions prior to making decisions. The range of actions covered by NEPA is broad and includes making decisions on permit applications; adopting federal land management actions; constructing highways and other publicly-owned facilities. Using the NEPA process, agencies evaluate the environmental and related social and economic effects of their proposed actions. Agencies also provide opportunities for public review and comment on those evaluations.[31]

[30] https://www.epa.gov/nepa/national-environmental-policy-act-review-process#EIS
[31] https://www.epa.gov/nepa/what-national-environmental-policy-act

**Road Decommissioning** refers to taking a system road off the map completely. How decommissioning is implemented and looks on the ground depends on the road's condition (e.g., might require obliteration or minor physical alteration if vegetation is already growing back). In some cases, a closed Level 1 road may look the same as a decommissioned road: the difference is that the former remains in the system with an assigned number, while the latter is not in the system.

**Road Obliteration** refers to what is done to a temporary road to make it inaccessible/unusable by the public after a timber sale. The primary objectives for obliterating a temporary road are (1) no future use/no vehicle access and (2) fluff and restore soils after a sale. The term, "closed," is not used with obliterated temporary roads because these are not system roads.

**Road Prism**
Refers to the width bounded by the top of the road cut slope on one side and the toe of the road fill on the other side.

**Temporary Roads** are needed for access with all logging systems (e.g., ground-based, skyline, and helicopter) where system roads are not present. Temporary roads are not system roads and are not intended for public access. Temporary road and landing design/maintenance are determined through an agreement between the Forest Service and the Contractor, and must comply with NEPA. An existing road grade is used when possible. Typically, the operator identifies a desired location for the temporary road and the Forest Service decides whether the site is appropriate or an alternate route is needed. Temporary roads should ideally be constructed and obliterated in the same operating season. They may be reopened if there is a need to go back for future treatment (e.g., 50 years).

**Young Stand Thinning, formerly known as Pre-Commercial Thinning:** Young Stand Thinning or Pre-commercial thinning is the removal of trees not for immediate financial return but to reduce stocking to concentrate growth on the more desirable trees - synonym respacing, thinning-to-waste.[32]

[32] The Dictionary of Forestry" by John A. Helms

# Appendix B: Pinchot Partners Board of Directors, 2024

## *Officers*

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

**John Squires,** Vice Chair - National Network of Forest Practitioners

**Anjolene Price,** Secretary - Hampton Lumber

**Ashley Short,** Treasurer - Cascade Forest Conservancy

**Matt Comisky,** At-large - American Forest Resource Council

## *Directors*

**Bill Little,** Founding Director - Lumber and Sawmill Worker Union Rep (retired)

**Bob Guenther,** Founding Director - Thurston Lewis Mason Central Labor Council

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

**David Owen,** Director - Randle resident

**Andrew Spaeth,** Director - Washington Department of Natural Resources

# Appendix C: Pinchot Partners Past Project Letters

Below are a selection of project letters for Forest Service projects that the Pinchot Partners have contributed to since our inception. The year next to the project name indicates the year when the corresponding decision was signed by the District Ranger.

## *Yellowjacket, 2024 (anticipated)*

November 29, 2023
District Ranger Theresa Tanner
ATTN: Yellowjacket Revised Draft Environmental Assessment

Thank you for the opportunity to respond to the revised Environmental Assessment (EA) for the Yellowjacket Restoration Project. The Cowlitz Valley Ranger District (CVRD) staff has spent significant time interacting with the Partners in meetings and field trips throughout the Yellowjacket planning process. We greatly appreciate and value this interaction.

Proposed Actions of the Yellowjacket Project as noted in the request for comments:

- Low intensity thinning of overstocked tree stands to optimize diameter growth, live crown ratio and reduce volume loss to mortality;
- High intensity thinning of overstocked tree stands to maximize individual tree diameter and crown growth and accelerate the development of old-growth characteristics;
- Huckleberry enhancement to maximize berry production;
- Regeneration harvest to provide local job opportunities, generate funds from a commercial timber sale, and provide early seral, open stand conditions.
- Creating snags and augmenting instream wood;
- Beetree Pond restoration and beaver dam analogs;
- Improving road conditions and access;
- Closing & stabilizing roads;
- Decommissioning roads;
- Rerouting approximately 0.65 miles of FR 2801 away from the Cispus River floodplain;
- Redesigning North Fork Campground to address safety issues caused by root rot and improve campsites and access;
- Removal of multi-use designation of approximately 58 miles of FR 22, 23, and 55 for OHV use from proposed action.

For each objective, we summarize our “Zones of Agreement” (ZOA) around topics we have already discussed in our broader ZOA document. Where there is a range of views, we will utilize these documents and the discussions that led to it as we

continue to develop a broader document that may be helpful to the CVRD planning team in the future.

In general, we'd like to reiterate the importance of early, ongoing involvement in the planning process. As stated in the *Timber Sales* section of our ZOA:

> "Currently, at least one representative of the Pinchot Partners attends monthly Forest Service interdisciplinary team meetings as a guest observer. We are grateful for this invitation, and request that it continues. To increase future success, we also request early and often communication from Forest Service staff on what types of sales are being considered for particular projects. The Partners would like the opportunity to meet with the timber program and pre-sales foresters on a biennial basis or as appropriate to give feedback on sale areas & boundaries as those decisions are made. We would also like the ability to suggest project ideas and provide feedback as to the viability of stewardship items and GNA-program revenue projects to ensure proposal feasibility and cost efficiency."

We support **thinning overstocked, dense tree stands** for the reasons below:

- Economically beneficial for local forest communities and maintains current forest product infrastructure, an integral part of restoration thinning .
- Ecologically, previous plantations are not functioning or at risk of not functioning, with low levels of structural and species diversity, resulting in a threat to wildlife and aquatic habitat .
- Will promote tree growth and increase structural diversity, while increasing light to the forest floor which will promote greater species diversity.
- Accelerating growth achieves Aquatic Conservation Strategy (ACS) guidelines.
- Allows understory growth and habitat that benefits a variety of wildlife species.
- Enhances opportunities for collection and/or harvest of specialty forest products.
- Improves forest aesthetics.

Areas of concern with commercial thinning include slope stability and distance of riparian buffers, addressed in another section below. We understand that potentially unstable soils and/or areas near aquatic features are classified as "riparian reserves" in the Northwest Forest Plan (NWFP). We understand that "potentially unstable" is a classification broadly drawn from the Soils Resource Plan. Additional concerns regarding maintaining protecting water quality and local microclimates within the riparian reserves were discussed, however the group could not come to consensus on future mitigation needs. One member also raised concerns over thinning trees over 35" DBH, noting the importance of larger, older trees on the landscape, though no consensus was reached on size limitations.

**Huckleberry restoration to maximize berry production;**

There is broad agreement that huckleberry enhancement activities are beneficial. We applaud the Forest Service for including huckleberry restoration activities in this proposal. We agree it is beneficial for several reasons:

- It opens up the area, providing early seral habitat for wildlife species.
- Huckleberries have significant cultural value.
- They also have economic value for commercial and recreational pickers.
- Enhancement improves the availability of berries.
- Enhancement is also beneficial to multiple plant and animal species.

However, we did not come to an agreement on the level of canopy cover in the prescription that should be retained/removed to benefit huckleberry productivity. While the Partners have been actively engaged in monitoring huckleberry restoration sites, we do not yet have the long term data to support a robust discussion on this topic. Therefore, we suggest reviewing and utilizing ongoing monitoring and GIS field research in the Huckleberry Restoration Management Strategy to determine a canopy cover level that is most beneficial to improving huckleberry productivity.

A member also commented on the concern over the size of huckleberry treatment units, however the group did not agree to what an appropriately sized unit should be. In order to extend the longevity of the openings, we recommend the use of fire, post-harvest, in all areas where possible.

**Regeneration harvest to create complex early seral habitat:**
A majority of Pinchot Partners agree broadly that complex early seral:

- Creates diversity,
- Develops a mosaic on the landscape increases early seral habitat across the forest;
- Creates a continuum of habitat types that includes meadows and clearings,
- Potential where older stands do not exhibit old growth characteristics and will not develop them,
- Economically beneficial for local forest communities and maintains current forest product infrastructure.

However, we did not reach full consensus about creating complex early seral for the following reasons:

- Because the scale of need for early seral decreases over time as wildfires increase the amount of this habitat typeUse of regeneration harvest on mature, naturally regenerated stands that have the potential to develop into old growth sooner than young forest.

Guidance for opening sizes should be consistent with the Gifford Pinchot Forest Land and Resource Management Plan. If treatments proposed do not follow this guidance, we would need to understand the purpose and a plan amendment would be necessary. An additional concern noted by one member regarding the potential impacts to Northern Spotted Owls, fishers, and other plant and animal species that are sensitive to habitat impacts when using regeneration harvest to create early seral

habitat. However, the group proposed that individual comments provide further detail on unit specific concerns.

**Snags and augmentation of instream wood**
There is broad support for creating down wood and snags where appropriate within this project. We suggest that where possible, this activity be conducted during other harvest activities to reduce operation costs and the need to mobilize multiple entries to accomplish the work. However, the District may should also consider implementing this work through a service contract, supplemented with Bipartisan Infrastructure Law (BIL) or Inflation Reduction Act (IRA) funds, or as a paid stewardship item, so that the cost of treatment does not fall on the timber sale purchaser. Doing so would likely bring more bidders to the table for timber sales offered.

**Beetree Pond restoration**
We have complete agreement that it would be beneficial to restore the Beetree pond by installing beaver dam analogs.

**Improving road conditions and access**
As stated in the *Forest Road Management* section of our ZOA document, we support efforts to preserve road benefits such as:

- Access to timber and special forest products that help support local economies and fund restoration activities
- Recreation opportunities for local residents and tourists
- Fire control, emergency response, and forest management activities (p.10).

**Decommissioning Roads**
We believe that road decommissioning should be focused on roads that have adverse environmental impacts and limited access needs. Criteria to consider for road decommissioning:

- Watershed risk
- Identified uses and reasonably foreseeable future management or need
- Recreation access value

Decommissioning can include:

- Eliminating the road from the GPNF database of system roads because the road has effectively closed itself and is no longer needed in the future
- Pulling and or upgrading culverts and stabilizing aquatic and terrestrial risks with entrance closure
- Full topographic restoration, where cost benefit analysis makes it a reasonable expense (Forest Road Management ZOA). Road decommissioning is an excellent candidate for retained receipts, consider supplementing full topographic restoration with outside funds, so the purchaser does not bear the cost.

**Closing and Stabilizing Roads**

Closing and stabilizing roads should be focused on roads not needed for current use and management of Forest Service lands, but may be needed in the foreseeable future. We recommend that for any road closure, a stub of closed road remains available (20-30') for parking and dispersed camping. Criteria to consider for closing and stabilizing:

- Watershed risk
- Recreation access value
- Identified uses within the foreseeable future

Closing and stabilizing can include:

- Blocking vehicular traffic
- Comprehensive watershed restoration

Road work is often the most costly part of a timber sale package, consider supplementing road work costs using available funds including those from the BIL, IRA, retained receipts, Good Neighbor Authority (GNA), Regional Office, Legacy Roads and Trails and other federal funds, such as Emergency Response for Federally Owned Roads (ERFO).

**Rerouting approximately 0.65 miles of FR 2801 away from the Cispus River floodplain**;
As stated in the *Forest Road Management* section of our ZOA document, we support efforts to prevent or reduce impacts such as:

- Degraded water quality and aquatic habitat from sedimentation, debris slides, clogged culverts, etc.
- Habitat fragmentation which can decrease biodiversity and increase predation
- Dispersal of invasive species, pathogens, and chemicals.

**North Fork Campground Redesign**
With growing demand on campgrounds, trail systems, and forest resources as a whole, more significant time & resources are required for appropriate management & maintenance of these areas. As noted in our recently approved *Recreation* ZOA the Partners broadly support the updating and addition of bathroom facilities. The Partners also find consensus in supporting proposed actions to address areas of root rot within North Fork Campground and provide additional camping access through yurt and appropriately-sized RV sites, which in our view, will assist in easing the burden of recreational use.

**Removal of Mixed-Use Designation of FR 55, FR 22, and FR 23**
The Partners previously discussed the proposed two-loop travel route for off-highway vehicles (OHV) and some members had concerns that the absence of a plan for education and enforcement of OHV use, as well as the absence of a full analysis of transportation and parking needs, could cause unnecessary resource impacts and conflict among user groups. The Partners support removal of this activity on the

updated draft EA and would be interested to discuss any future analysis outside the scope of this document's updated purpose and need.

**For Additional Consideration: Treatments within Riparian Reserve**
Past harvest practices have left many riparian areas in a structurally simple state. Thinning in riparian areas can accelerate the stand's trajectory to produce large conifers and has minimal effect on stream temperature with reasonable buffers. The Partners have long advocated for active management of the Riparian Reserves, particularly in over-stocked plantations.

The group has come to consensus on applying Option B from Reeves et al. 2016, which suggests support for more active management of the Riparian Reserves of plantation stands. As stated in our Silvicultural Management within Riparian Reserves ZOA, the collaborative supports the site-specific approach (Option B) and would like to see the FS use this methodology in this project to address the structure and complexity of riparian areas in overstocked plantation stands.

We could not come to agreement on exactly how large the inner Riparian Reserve Zone should be. Some members believe they are too large in the proposal for the following reasons:

- The original findings that were incorporated into the NWFP suggest that most ecological functions could be maintained by reserves equal to or less than the distance of one site-potential tree-height. The functions include beneficial effects of root strength for bank stability, litterfall, shading to moderate water temperatures, and delivery of coarse wood to streams. Recent studies suggest that many of these ecological functions are maintained at shorter distances than was initially suggested in the FEMAT analysis (Brosofske et al. 1997, Welty et al. 2002, Gregory et al. 2003, Rykken et al. 2007, Spies et al. 2013, Anderson and Poage, 2014).
- The no-harvest buffers proposed represent significant increases that: (1) would remove an important source of funding (stewardship sale retained receipts) that are regularly applied to address road-related fish and aquatic resource impacts; (2) would significantly impact the operability of forest health treatments that are needed to achieve Aquatic Conservation Strategy goals in many Riparian Reserves; (3) would have significant economic impacts on rural communities; (4) are not substantiated by robust scientific literature compared to previous agency consultation agreements

For future planning areas, this is a great example of a topic that the Partners would like to discuss in detail with relevant specialists early on and throughout the planning process. Conversations around treatments within Riparian Reserves as well as buffer widths can be contentious; digging into the details of what the district has planned early on will give us the time to have these nuanced discussions and provide more useful project and/or site-specific feedback.

**For Additional Consideration: Visual Resource Impacts, Logging Technology, Innovation in Markets, & Socioeconomic Factors**

For visual resource impacts, we would like to further discuss how the Partners may assist with public outreach to ensure the need for and benefits of this project are well understood. From our previous comments on the draft Kraus Ridge EA we would like additional consideration of how short term visual impacts lead to a long term restored 'natural' forest setting, as opposed to creating design features that aim to hide visual resource impacts.

We would like to encourage the Forest Service to review tethered logging technology as an option for this planning area, and future planning areas. We submit the following research for CVRD consideration: *Insight into the Productivity, Cost and Soil Impacts of Cable-assisted Harvester-forwarder Thinning in Western Oregon* by Green 2008, et al[33].

We also would like to encourage innovation in markets, such as allowing up to certain percentages of slash to be removed from timber harvest areas, or secondary or tertiary markets associated with forest planning activities.

In our previous comment letter, we encouraged including a **purpose** of sustaining the health and economic well-being of people and a **need** for forest products via a sustainable timber supply that will help maintain the stability of local and regional economies, and contribute valuable resources to the national economy, on a predictable and long-term basis. We appreciate and thank district leadership for the inclusion of commercial timber harvest with the explicit need to provide local jobs and ensure rural economic development. A focused socioeconomic purpose and need is essential to ensure proper alignment with and full realization of intended outcomes of the NWFP. Existing mill infrastructure depends greatly on the availability of raw material from projects like this.

Placing an emphasis on economics in the defined purpose and need sends a strong signal of the importance of the existing and potential future local and regional manufacturing facilities, along with the forest health contractors that will be supporting and performing watershed and forest health treatments on the ground.
We also request that the CRVD meet with the Partners to discuss potential sale typing in the planning area, to include both GNA and stewardship sales, as well as discuss any economic pitfalls prior to a bid package being offered. This will ensure that the sale offered is economically viable, so that bidders will be at the bid table upon offer.

The Pinchot Partners hope that the information provided in this letter will aid ourForest Service partners in completing the Yellowjacket EA. Please let us know if there is anything else we can provide that will help bring this analysis to completion so that implementation of this important restoration work may begin.

[33] https://doi.org/10.1093/forsci/fxz049

Thank you for your consideration,
John O’Brien
Pinchot Partners Chair

## *Kraus Ridge, 2020*

May 15, 2020
Acting District Ranger Stan Helin, incoming District Ranger Nikia Hernandez
Subject: Kraus Ridge Environmental Assessment

Thank you for the opportunity to respond to the Preliminary Environmental Assessment (EA) for Kraus Ridge. The Cowlitz Valley Ranger District staff has spent significant time interacting with the Pinchot Partners in meetings and field trips throughout the Kraus Ridge planning process. We appreciate that interaction.

The Pinchot Partners working group has met to discuss the proposed activities and determine where there is agreement within the collaborative and where there are varying options. The working group's preliminary response letter was then presented to the broader collaborative for concurrence.

Objectives of Kraus Ridge Environmental Assessment as noted in the Scoping Letter:

- To produce commercial yields of timber from Matrix lands.
- Accelerate the development of old-growth forest characteristics on Late Successional Reserve lands and in mature stands of Matrix lands within historic Northern spotted owl activity centers.
- Accelerate the achievement of the Aquatic Conservation Strategy on Riparian Reserves.
- Enhance huckleberry productivity on Administratively Withdrawn lands.
- Maintain a safe and efficient transportation network.
- Implement restoration actions to improve the aquatic and terrestrial habitats.

These goals are largely the same as goals proposed for Iron Crystal planning area. The Pinchot Partners supported the majority of proposed objectives and actions for Iron Crystal. We agreed that the proposed actions are beneficial to both the health of the forest and health of local forest community economies. However, the addition of "in mature stands of Matrix lands within historic Northern spotted owl activity centers" is not supported by the Pinchot Partners without suitable owl monitoring to determine if the historic owl activity centers are still occupied before making this proposed management strategy change. Monitoring and updating of owl habitat should be occurring.

For each Action Item in the EA, we explain where there is agreement and where there is a range of views. We will utilize this document, and the discussions that led

to it, as we continue to develop a broader “Zones of Agreement” document that may be helpful to the CVRD planning team in the future.

**Kraus Ridge EA Specific Actions:**

**Action 1, Prescription 1 –Thinning:**

The Pinchot Partners support thinning overstocked plantations from 1947–1981 for the reasons below:

- Economically beneficial for local forest communities.
- Ecologically, plantations aren’t functioning at moderate to high habitat levels.
- Will promote tree growth and increase structural diversity.
- Accelerating growth achieves Aquatic Conservation Strategy (ACS) guidelines.
- Allows understory growth and habitat that benefits a variety of wildlife species.
- Enhances opportunities for collection and/or harvest of specialty forest products.
- Improves forest aesthetics.

Areas of concern with commercial thinning include slope stability and distance of riparian buffers. We understand that potentially unstable soils are classified as “riparian reserves” in the Northwest Forest Plan (NWFP). We understand that “potentially unstable” is a classification broadly drawn from the Soils Resource Plan.

We believe that going forward, it would benefit all parties to better identify slope stability concerns throughout the forest. This key issue affects all aspects of forest management and it would be to the benefit of the Forest Service and Pinchot Partners to work together to identify resources and research to better understand slope stability and instability on the Cowlitz Valley Ranger District.

The Pinchot Partners did not reach consensus about riparian buffer widths.

The prescription of ‘thinning’ seems overbroad for a wide variety of proposed treatments. Light, moderate, and heavy thinning are different potential classifications. It would be beneficial to be able to understand harvest intent. The table has information but does not break out the treatment goals. Additionally, thinning volume should be consistent with economic feasibility. For instance, light thinning in skyline and helicopter units are infeasible.

**Action 1, Prescription 2 – Even-Age Regeneration Harvest with Green Tree Retention:**

A majority of Pinchot Partners agree broadly that regeneration harvest:

- Creates diversity.
- Develops a mosaic on the landscape.
- Creates a continuum of habitat types that includes meadows, clearings.
- Potential where older stands are not exhibit old growth characteristics and will not develop them.

However, we did not reach full consensus about implementation of regeneration harvest for the following reasons:

- Areas where it is being proposed – mature, naturally regenerated stands that are not well represented.
- Purpose of treatment.
- Use of regeneration harvest to create diversity on the landscape.

**Action 1, Prescription 3 – Uneven-Age Regeneration Harvest with Green Tree Retention:**

The Pinchot Partners could not reach full consensus on regeneration implementation of harvesting uneven age stands. The majority agreed that it was following the NWFP and was beneficial. However, there was a divergence of opinion about the benefits of these treatments, their consistency with the NWFP, and concern about applying these treatments in naturally-regenerated areas that are 80-100 years old.

**Action 1, Prescription 3 – Huckleberry Enhancement Harvest:**

We support this activity. We request information when huckleberry stands condition and how the treatment is intended to enhance huckleberry productivity. Huckleberry enhancements and canopy covers proposed could be economically feasible. However, helicopter units are cost prohibitive and it is difficult to find contractors. The quality of the wood is a major factor in economic feasibility.

**Action 1, Prescription – Gap Creation and Late Seral Stand Enhancement:**

We support this activity if self-sustaining and need is well-documented, but have some concerns about its commercial viability, or method for pairing with another sale.

**Action 2 – Huckleberry Enhancement:**

There is broad agreement that huckleberry enhancement activities are beneficial. We applaud the Forest Service for including huckleberry restoration activities in this proposal. We agree it is beneficial for several reasons:

- It opens up the area.
- Has cultural value.
- Has economic value for commercial and recreational pickers.
- Improves availability of berries.
- Is beneficial to multiple plant and animal species.

However, there was not agreement on the level of canopy cover in the prescription that should be retained/removed to benefit huckleberry productivity. Our discussion centered around the questions of whether huckleberry areas left for a period of time or being opening for the present and re-entering later.

Several members questioned the longevity of the treatment effectiveness. In order to extend the longevity of the openings, we recommend the use of fire, post harvest, in all areas where possible. We also suggest reviewing and utilizing ongoing monitoring and GIS field research in the Huckleberry Restoration Management Strategy to determine a canopy cover level that is most beneficial to improving huckleberry productivity.

**Action 3 – Transportation System Improvements:**

There is overall agreement to activities proposed to improve the transportation system. We recognize that improved road conditions will decrease runoff and improve aquatic conditions. Improvements are also necessary to the safety of forest visitors. We suggest using best management practices to include invasive species treatments when daylighting riparian areas.

However, we have concerns about the amount of temporary roads proposed in the EA. Temporary roads (42 miles) excessive for environmental and economic costs, excessive for the timber value. Pinchot Partners offer to help with technical planning activities to reduce road mileage costs and environmental impact.

We encourage Cowlitz Valley to consider creating optional improvements that occur only if the economic benefits support these improvements. Optional items could be covered in a contract outside of the timber sale contract to increase the project's economic feasibility.

**Action 4 – Late Successional Reserve Restoration:**

The Pinchot Partners would like to know if Western red cedar is the late seral species for all of these stand elevations and locations. If not, we would like an analysis of appropriate historical late seral tree species, or rationale for selecting Western red cedar instead.

**Action 5 – Special Habitat Restoration:**

We generally support these activities, with specific caveats noted below:

Riparian forest enhancement. Here is a difference in opinion about how riparian reserves should be treated. We did not reach consensus for this project. In general we support this activity.

Cedar Bog and Woods Creek Pond. We agree with proposed activity at lower Teacher Creek and Wood Creek wetlands, but do not concur that removal of reed canary grass by mechanical means is desirable or effective. The risk of disturbance and impact is high while the likely success of removal is low.

Aquatic organism passage. We have complete agreement that it would be beneficial to replace culverts that are undersized or function improperly.

Instream habitat improvement. Based on information in the EA, it is difficult to understand where and why restoration proposals are going to occur. There is agreement that the improvement work is beneficial but there is not enough detail to analyze project objectives and outcomes. It is unclear if this is proposed, but we do not agree with the concept of using riparian reserve trees harvested in other stream reaches.

Landing restoration. In general we agree with this action, so long as it does not adversely affect the condition of the site.

English Holly. We support this action.

**Action 6 – Travel Management:**

We generally agree with the proposed activities titled Woods Creek Trails Rehabilitation, trailhead parking and culvert upgrades. While we generally agree, some believe that in order to reduce costs and ensure economic feasibility, the Forest should start with only implementing the upgrades that are necessary to haul. Then, using retained receipts or GNA funds, the District can do the other upgrades over time. This subset of the group states that the first objective is to sell the sale, which then supports the completion of the restoration work.

We would like to understand if road closures are administrative action of removing roads from maps and GIS layers or a physical, on the ground closure.

For Consideration: Review Felling Methods:
We would like an assessment of if cutting stumps flush within 100' of road is necessary and does it lead to an incorrect assumption of the 'natural' status of the forest. While visual continuity for visitors may be valuable, we would like to understand the cash value of this work and compare it to the social value.

We would like to encourage the Forest Service to review tethered logging technology as an option for this planning area, or future planning areas.

We also would like to encourage innovation in markets, such as allowing up to certain percentages of slash to be removed from timber harvest areas, or secondary or tertiary markets associated with forest planning activities.

**Suggestions for inclusion in the final EA:**

The Pinchot Partners have worked closely with staff from the Cowlitz Valley Ranger District throughout the development of the Kraus Ridge proposal. We believe we represent a microcosm of the broader public and that it is prudent to note our interaction with the Forest Service. It demonstrates that Cowlitz Valley Ranger Station and Gifford Pinchot National Forest has done due diligence with public involvement. In addition to consistent interaction with the FS, we assisted in publicizing and organizing a public outreach Open House for Kraus Ridge and promoted several field trips for public participation.

The Pinchot Partners hope that the information provided in this letter will aid the Forest Service in completing the Kraus Ridge Environmental Assessment. Please let us know if there is anything else we can provide that will help bring this project to completion.

Thank you for your consideration,
Taylor Aalvik
Pinchot Partners Chair

## *Iron Crystal, 2018*

January 21, 2018
Gar Abbas, District Ranger
Subject: Iron Crystal Preliminary EA

Thank you for the opportunity to respond to the Preliminary Environmental Assessment (EA) for Iron Crystal (I.C.). The Cowlitz Valley Ranger District staff has spent significant time interacting with the Pinchot Partners in meetings and field trips throughout the Iron Crystal planning process. We appreciate that interaction.

The Pinchot Partners I.C. response working group has met several times over the past four months to discuss the proposed activities and determine where there is agreement within the collaborative and where there are varying options. The working group's preliminary response letter was then presented to the broader collaborative for concurrence.

Objectives of Iron Crystal Environmental Assessment as noted in the Scoping Letter:

- To produce commercial yields of timber from Matrix lands.
- Accelerate the development of old-growth forest characteristics on Late Successional Reserve lands.
- Accelerate the achievement of the Aquatic Conservation Strategy on Riparian Reserve lands.
- Enhance huckleberry productivity on Administratively Withdrawn Area lands.
- Maintain a safe and efficient transportation network.
- Implement a number of restoration activities to improve the aquatic and terrestrial environment within the Iron Creek and Crystal Creek.

The Pinchot Partners support the majority of proposed objectives and actions for Iron Crystal. We agree that the proposed actions are beneficial to both the health of the forest and health of local forest community economies. For each Action Item in the EA, we explain where there is agreement and where there is a range of views. We will utilize this document, and the discussions that led to it, to develop a broader "Zones of Agreement" document that may be helpful to the CVRD planning team in the future.

**Iron Crystal EA Specific Actions:**

**Action 1, Prescription 1 – Commercial Thinning**

The Pinchot Partners support thinning overstocked plantations from 1947–1981 for the reasons below:

- Economically beneficial for to local forest communities
- Ecologically, plantations aren't functioning at moderate to high habitat levels.
- Will promote tree growth and increase structural diversity
- Accelerating growth achieves Aquatic Conservation Strategy (ACS) guidelines
- Allows understory growth and habitat that benefits a variety of wildlife species
- Enhances opportunities for collection and/or harvest of specialty forest products
- Improves forest aesthetics

Areas of concern with commercial thinning include slope stability and distance of riparian buffers. We understand that potentially unstable soils are classified as "riparian reserves" in the Northwest Forest Plan (NWFP). We understand that "potentially unstable" is a classification broadly drawn from the Soils Resource Plan.

We believe that going forward, it would benefit all parties to better identify slope stability concerns throughout the forest. This key issue affects all aspects of forest management and it would be to the benefit of the Forest Service and Pinchot Partners to work together to identify resources and research to better understand slope stability and instability on the Cowlitz Valley Ranger District. We also suggest that a glossary or "definition of terms" would be helpful to readers, especially in regards to soils and riparian sections of the EA.

The Partners, while from different perspectives and viewpoints, agree on our concern over the level of and depth of the slope stability assessment as presented b in the EA. It appears much of the assessment was done via remote sensing often using older data sets that are more closely related to soil erosion issues as compared to slope stability concerns related to the underlying geology. It is also unclear to what extent the use of a geotechnical expert was used, especially in field reviews. Because of this, there is concern on the part of the Partners that these assessments may be overly or under protective when it comes to including or excluded stands from treatment. We would appreciate a greater explanation of the differences between soil science experts and Geotech experts and their role in this analysis.

The Pinchot Partners did not reach consensus about riparian buffer widths.

**Action 1, Prescription 2 – Even-Age Regeneration Harvest with Green Tree Retention**

A majority of Pinchot Partners agree broadly that regeneration harvest:

- Creates diversity

- Develops a mosaic on the landscape
- Creates a continuum of habitat types that includes meadows, clearings

However, we did not reach full consensus about implementation of regeneration harvest for the following reasons:

- Areas where it is being proposed – mature, naturally regenerated stands that are not well represented
- Purpose of treatment
- Use of regeneration harvest to create diversity on the landscape

**Action 1, Prescription 3 – Uneven-Age Regeneration Harvest with Green Tree Retention**

The Pinchot Partners could not reach full consensus on regeneration implementation of harvesting uneven age stands. The majority agreed that it was following the NWFP and was beneficial. However, there was a divergence of opinion about the benefits of these treatments, their consistency with the NWFP, and concern about applying these treatments in naturally-regenerated areas that are 80-100 years old.

**Action 2 – Huckleberry Enhancement**

There is broad agreement that huckleberry enhancement activities are beneficial. We applaud the Forest Service for including huckleberry restoration activities in this proposal. We agree it is beneficial for several reasons:

- It opens up the area
- Has cultural value
- Has economic value for commercial and recreational pickers
- Improves availability of berries
- Is beneficial to multiple plant and animal species.

However, there was no agreement on the level of canopy cover in the prescription that should be retained/removed to benefit huckleberry productivity.

Several members questioned the longevity of the treatment effectiveness. In order to extend the longevity of the openings, we recommend the use of fire, post harvest, in

all areas where possible. We also suggest reviewing and utilizing ongoing monitoring and GIS field research in the Huckleberry Restoration Management Strategy to determine a canopy cover level that is most beneficial to improving huckleberry productivity.

**Action 3 – Transportation System Improvements**

There is overall agreement to activities proposed to improve the transportation system. We recognize that improved road conditions will decrease runoff and improve aquatic conditions. Improvements are also necessary to the safety of forest visitors. We suggest using best management practices to include invasive species treatments when daylighting riparian areas. There is not consensus about how close to culverts daylighting should occur.

**Action 4 – Aquatic organism passage**

There is complete agreement that it would be beneficial to replace culverts that are undersized or function improperly.

**Action 5 – Close and stabilize Forest Roads segments**

There is complete agreement to the proposed close and stabilize actions as presented in the E.A.

There is concern about the potential cost of stabilization in some situations in areas that are not easily accessible.

**Action 6 - Decommission Forest Road segments and remove log crossings**

The Pinchot Partners cannot reach consensus on decommissioning of forest roads.

**Action 7- Riparian forest tree release and down wood creation**

There is a difference in opinion about how riparian reserves should be treated. We did not reach consensus for this project.

**Action 8 - Instream habitat improvement on Iron Creek**

Based on information in the E. A. It is difficult to understand where and why restoration proposals are going to occur. There is agreement that the improvement

work is beneficial but there is not enough detail to analyze project objectives and outcomes.

**Action 9 – Remnant Landings Restoration**

There is agreement that it is beneficial to reclaim remnant landings.

**Action 10 - Large Snag Creation**

The Partners could not come to agreement about large snag creation because we did not feel that there is not enough information in the E.A. to understand why extensive snag creation is proposed.

**Action 11 - Meadow Restoration on Forest Road 7708-017**

**Action 12 – Restoration of Forest Roads 25, 76, 77, and 99**

There is overall agreement that proposed actions are beneficial to road longevity, visitor safety and reduction in aquatic disturbance.

**Action 13 – Reclamation of Forest Roads 26 and 77**

There is overall agreement that proposed actions are beneficial to road longevity, visitor safety and reduction in aquatic disturbance. There is concern about petroleum in asphalt leaching into groundwater.

**Action 14 – Huffaker Bridge Restoration**

There is complete agreement to remove and replace Huffaker Bridge and a need to find funding to support the project.

**Action 15 – Iron Creek Campground Trail #187**

There is complete agreement to restoration of the Iron Creek Campground Trail #187. Portions of it would be good projects for the White Pass Discovery Team.

**Action 16 – Cispus River Seed Orchard rehabilitation**

There is agreement that the Cispus Seed Orchard needs to be rehabilitated.

**Financial Analysis**

The Pinchot Partners appreciate that more details were provided in this analysis; it is better than we have seen in other recent projects.

**Suggestions for inclusion in the final EA**

The Pinchot Partners have worked closely with staff from the Cowlitz Valley Ranger District throughout the development of the Iron Crystal proposal. We believe we represent a microcosm of the broader public and that it would be prudent to note our interaction with the Forest Service. It would demonstrate that the Forest Service has done due diligence with public involvement. In addition to consistent interaction with the Forest Service, we assisted in publicizing and organizing a public outreach Open House for an Iron Crystal Open and promoted several field trips for public participation.

**Suggestions for future landscape scale projects**

In addition to comments on proposed actions, the Pinchot Partners offer the following suggestions for consideration in future Environmental Assessments:

- Review Huckleberry Restoration Management Strategy periodically as it is updated with new information about effectiveness of enhancement treatment options.
- If possible, treat huckleberry treatment areas with fire post harvest
- When considering the operating period for harvest activities, it should be determined by description of conditions based on environmental thresholds, not strict dates.
- Work to increase a geo-hazard database throughout the forest; incorporate more recent scientific documents and tools in soils and geologic assessment.
- Include a glossary or “Definition of Terms” section explaining commonly used phrases that the public may not know.

The Pinchot Partners hope that the information provided in this letter will aid the Forest Service in completing the Iron Crystal Environmental Assessment. Please let us know if there is anything else we can provide that will help bring this project to completion.

Thank you for your consideration,

Taylor Aalvik
Pinchot Partners Chair

## *Silver Stewardship, 2017*

November 16, 2017
Gar Abbas, District Ranger
Subject: Silver Stewardship Restoration Project

Thank you for the opportunity to recommend our priorities for restoration projects for the Silver Creek Stewardship Plan and for talking with the Pinchot Partners about the process at the October 12, 2017 and November 9, 2017 meetings.

It is the Pinchot Partners understanding that approximately $1,620,000 is expected in stewardship sale revenue that will be available for restoration projects. We understand that restoration activities will occur over several years as different sale contracts are awarded.

Restoration projects may occur before, during and after the thinning operations, depending on the geography of the area and the type and location of the restoration activity. Our recommendation will assist you to prioritize the order in which restoration activities are funded when limited funding is available. At the November 9, 2017 meeting, the Pinchot Partners agreed to the following priorities for restoration projects in the Silver Creek Stewardship Plan:

1. Young Stand Thinning
2. 4733 Road Culvert Replacement and Gully Restoration
3. 4745 Road Gully Restoration
4. Silver Creek Riparian and Instream Restoration
5. Aquatic Risk Reduction Road Closure
6. Additional Road Projects
7. Hampton Creek Wetland Restoration
8. Riparian Reserve Down Woody Debris Creation and Tree Release
9. Fish Passage Barrier Removal
10. Invasive Plant Control
11. Lower Silver Creek Winter Road Density Reduction
12. Log Bunk Removal
13. 7500065 Road Closure and Stabilization

14. Foraging Habitat Snag Creation

Thank you for the opportunity for the Pinchot Partners to be involved with prioritizing restoration projects for Silver Creek. Restoration projects are vital to improving overall forest health and an important component of the work the Pinchot Partners do in partnership with the Forest Service.

Sincerely,
Bob Guenther
Pinchot Partners Vice Chair

## *Silver Creek Thin, 2017*

December 31, 2015
Gar Abbas, District Ranger
Subject: Silver Creek Thin Scoping

The Pinchot Partners appreciate the opportunity to comment on the Preliminary Environmental Assessment for the Silver Creek Thin. We also appreciate including the Partners in inter-disciplinary meetings, field trips and receiving updates throughout NEPA planning. During scoping for Silver, the Pinchot Partners provided comments on restoration projects, at your request. Our primary concern was to restore huckleberry habitat within the Silver Creek area as huckleberry restoration is a priority for the Pinchot Partners. We offered suggestions in which different types of restoration methods could occur. Ideally, we would like to see huckleberry restoration where historic information or other ecological supporting analysis would warrant it.

We do not feel huckleberry restoration was adequately addressed in the draft EA. Huckleberries are noted only nine times in the 247 page draft EA, mostly in the plant associations table (on page 50) where they are noted as a primary understory plant in units 2, 9, 13, 33 and 36. If a prior historical conditions analysis had been performed, undoubtedly, huckleberry areas would have been documented as being prevalent in the upper elevations of the Silver area and received more analysis.

Huckleberries are noted as a special forest product of interest to forest visitors on page 195 of the draft EA. While we understand there is currently no management direction for huckleberry restoration on Gifford Pinchot National Forest Land and Resource Management Plan or Northwest Forest Plan amendment, we encourage you to be more inclusive of multiple social values of interest to forest visitors in the analysis and give more attention to huckleberries and huckleberry habitat.

We also noticed an error on page 12 of the preliminary EA. It notes that the Forest Service held a public meeting on November 12, 2014. That meeting was co-hosted with the Pinchot Partners. We worked with Erica Taecker to develop the flyer, send out press releases, post notices and we provided food in order to encourage community members to attend.

Sincerely,
Taylor Aalvik
Pinchot Partners Chair

## *Nisqually Stewardship, 2015*

March 27, 2015
Gar Abbas, District Ranger
Subject: Nisqually Stewardship Restoration Projects

Thank you for the opportunity to be involved with prioritizing stewardship restoration projects for the Nisqually area. It is the Pinchot Partners understanding that approximately $1.5 million is currently expected in available stewardship funding. At the March 12th meeting the Pinchot Partners agreed to the following restoration priorities for Nisqually.

1. Re-establish Natural Flow Lines, $13,200
2. Young stand thinning, 13 stands, 349 acres, to increase productivity, $42,000
3. Foraging Habitat Snag Creation – snags outside of plantations in older trees, approx. 1000 snags, $50,000
4. Wildlife Road Closures – in LSR, remove pipes & stabilize crossings, 3 sections of road, 4.4 mi at $110,000
5. Ditch and Culvert cleaning on various roads determined by engineer, cap at $250,000
6. Dispersed Recreation Site rehab at Big Creek, $22,400
7. White Pine Pruning Project, six stands, 63 acres, $5,570
8. Big Creek Fish Passage on FR 8420, cap at $180,000
9. Riparian and Instream Restoration, utilize KV for some portions, $260,000 (cap at $180K).
10. Restore Old Bridge Crossing on Berry Creek, $100,000
11. Underplanting project – 5 stands, 256 acres, $130,00

Any remaining funding should go into the Retained Receipt fund for future use. The Partners also agreed to recommendations for “local area:”

- Tier 1 from Packwood to the I-5 corridor

- Tier 2 is Western Washington

Thank you for your consideration,
Taylor Aalvik
Pinchot Partners Chair

## *Polepatch Huckleberry Restoration, 2013*

August 6, 2013
Gar Abbas, District Ranger
Subject: Polepatch Huckleberry Restoration Draft Environmental Assessment (Polepatch EA)

We would like to thank the Cowlitz Valley Ranger District interdisciplinary team and others who have committed towards the planning, and development of the Polepatch EA. We also are appreciative that the Forest Service has worked closely with the Pinchot Partners and the Cowlitz Indian Tribe throughout the planning effort. As you are aware, The Pinchot Partners and the Cowlitz Tribe began this effort and partnership with the Forest Service initially in 2009. We have appreciated staff involvement through the several field trips and team planning meetings that have taken place over the last few years. We are pleased to know that we will soon begin implementing a project that is very culturally important to many within the local community and the Cowlitz Tribe.

We would like to reiterate the primary purpose as to why the Pinchot Partners and the Cowlitz Tribe joined in this effort in the beginning. There has been growing concern from a variety of sources of the ever increasing competition over the ability to secure/pick huckleberries within the Polepatch and Mosquito Meadows area. One concern is that many traditional huckleberry picking areas are shrinking due to natural processes of succession or conifer forests filling in once vibrant huckleberry fields. Traditionally, Native Americans had managed these areas through use of fire to maintain openness for huckleberry growth.

Another concern is the continued deterioration of roads for access into traditional huckleberry areas. With shrinking huckleberry fields, there is concern about an increase in overall competition for this limited resource. Limited access can increase competition.

Our idea was to work with the Forest Service to increase areas of opportunity for huckleberry harvest. While generating revenue is not a main intent of the proposed action, we hope there is opportunity for obtaining retained receipts to put towards additional huckleberry management actions or enhancement projects within the forest. We believe that additional opportunities will increase harvesting areas and relieve needs to further limit huckleberry harvest through law enforcement and added policies.

As this project moves forward, various treatment areas should be monitored several years after completion to measure the effectiveness of treatments for use in future projects. Perhaps the Pinchot Partners could work with the Forest Service on post-activity monitoring.

Again, we sincerely appreciate that we have reached this point in the process for this very important action. We express a desire to continue following and participating in this project and future projects on the forest. If you have questions or would like to have a follow up discussion in regards to this and other huckleberry enhancement opportunities, please reach out.

Sincerely Yours,
Taylor Aalvik
Pinchot Partners Chair

## *North Fork, 2012*

July 22, 2010
Kristie Miller, District Ranger
Subject: North Fork Scoping Comments

We are writing to provide scoping comments on the proposed North Fork project on behalf of the Pinchot Partners. The Pinchot Partners formed in 2003 to address the gridlock and controversy that has clouded forest management in the region for the past two decades. Working collaboratively, the group has found common ground around restoring watersheds through thinning young stands and road decommissioning to restore terrestrial and aquatic habitat, produce wood products, and create stable, quality local jobs. The Pinchot Partners are a diverse array of organizations and individuals including labor unions, environmental groups, local community members, community development organizations, and forest industry representatives.

In the past 7 years, Pinchot Partners have undertaken multiple projects to move young stand thinning and watershed restoration forward on the Cowlitz Valley Ranger District. In addition to on-the-ground projects, we have completed a stand exam project inventorying 30,000 acres of young stands for ongoing thinning projects. We have also worked to develop consensus-based alternatives for several controversial Forest Service timber sales. Our interest in the North Fork is to avoid controversy and appeal of the sale by proposing ideas and criteria that will make it acceptable to the diverse interest groups represented by the Pinchot Partners. We have a number of issues and concerns we would like to see addressed in the EA.

**Scoping Process:** Historically the Forest Service has had a 30-day comment period and we are disappointed there was an abbreviated timeframe for this project. The project encompasses 2,700 acres and it is impossible to compile detailed scoping comments in such a short timeframe. We would like comments and discussion from the Pinchot Partners field tour to the North Fork project area scheduled for August 10, 2010 with you to be included in the scoping process. In addition the information provided was very general and lacked the detail needed to properly examine the

project. For example the number and location of temporary roads would be helpful to have during the scoping process. Please consider this for future scoping processes.

**Naturally Regenerated Stands:** The ideal of the Pinchot Partners is to support and initiate projects that have clear ecological, social, and economic benefits. We hope to work with the Gifford Pinchot National Forest (Gifford Pinchot National Forest) staff to increase the efficiency of the planning process and help the Gifford Pinchot National Forest meet its volume targets. The ecological gains of thinning in mature, structurally complex naturally regenerated stands are less clear than in younger, managed stands. In stands that are already patchy, contain multiple canopy layers, have legacy old growth trees, and/or have high levels of medium to large sized snags and downed wood, thinning is likely to set back the development of habitat for species dependent on old growth forests. These structurally complex stands likely provide suitable foraging habitat for Northern Spotted Owls and may be close to nesting habitat. On the other hand, thinning in dense, single-story natural stands where past thinning has simplified stand structure and removed most snags may lead to faster development of old growth characteristics. These structurally simple, dense stands typically produce more volume per acre and are much less complicated in terms of NEPA analysis, prescription development, and sale layout. Of course, focusing on these types of stands also reduces controversy. We encourage the Forest Service to focus on managed stands and structurally simple natural stands.

Based on our experience with past projects, we are concerned that the current selection of stands includes complex units that will bog down the internal planning process, complicate consultation, and create controversy that may slow down the process externally. While including these units may seem like a path to producing more volume, experience from past projects on the GPNF and other National Forests across the Pacific Northwest has shown that focusing on projects that are relatively simple from a NEPA planning standpoint; have clear ecological, social, and economic benefits; and are collaboratively developed with stakeholders leads to higher harvest levels over time.

In conclusion, thank you for the effort to collaborate with the Pinchot Partners during the development of the North Fork project. We encourage the Forest Service to better utilize the Pinchot Partners by working to develop a project supported by diverse interests. We believe we can help improve the project and gain support from diverse interests which will help make it efficient and successful for all partners. This letter includes two main requests 1) include comments and discussion from Pinchot Partners field tour on August 10" as part of scoping process; and 2) Focus on managed and structurally simple natural stands rather than structurally complex natural stands.

Sincerely,
Taylor Aalvik
Pinchot Partners Chair