



Zones of Agreement

Early Seral Habitat Creation



Gifford Pinchot National Forest
South Zone Planning Area

Table of Contents

Acknowledgments	3
About the SGPC	4
Document Purpose	5
Comprehensive Decision-Making Model	5
Living Document	5
Historical Record	5
ZOA: Early Seral Habitat (ESH) Creation	6
The role of ESH	6
Methods used for reaching agreement on ESH	7
Synthesis of areas of agreement on early ESH	8-9
Synthesis of areas currently lacking agreement on ESH	10
Appendix A: SGPC Project History	11
Appendix B: Early Seral Habitat Research	12-14
Appendix C: Past SGPC Project Comment Letters	15-33
Coyote Thin Comment Letter (03/05/2012)	15-16
Bear Creek Restoration Thin Comment Letter (04/15/2015)	17-20
Swift Thin Comment Letter (04/16/2015)	21-23
Upper White Salmon Restoration Comment Letter (12/16/2016)	24-29
Upper Wind Summary of Positions (07/24/2020)	30-33
Appendix D: Acronyms	34
Appendix E: SGPC Early Seral / Upper Wind Survey Results	35-38

Acknowledgments

The South Gifford Pinchot Collaborative (SGPC) extends thanks to the Blue Mountains Forest Partners (BMFP) for their extensive work on Zones of Agreement (ZOA) that served as a model and inspiration for this work. The Collaborative also thanks our Forest Service partners, Erin Black, Bengt Coffin, and Jon Nakae for their willingness to participate in subcommittee meetings, share information, and offer constructive feedback. This document was constructed by the SGPC ZOA Subcommittee with ongoing input from the larger Collaborative.

Note: This document was approved via electronic vote on 4/23/2021

About the South Gifford Pinchot Collaborative (SGPC)

In the fall of 2008, Skamania County Commissioners formed the Mt. Adams District Collaborative and the Lewis River Collaborative in an effort to explore how collaboration with the U.S. Forest Service (abbreviated to FS in this document) and the Stewardship Sale Authority could improve forest health and provide economic benefits to local communities on the southern end of Gifford Pinchot National Forest (GPNF). Recognizing that they were often working on similar issues with shared members, the two groups combined to form the SGPC in December 2011.

The SGPC's mission is to collectively improve development, facilitation, and implementation of projects that enhance economic vitality, forest ecosystems, outdoor recreation, and public safety on the south end of Gifford Pinchot National Forest and surrounding communities. Collaborative members include conservation and environmental organizations, recreation groups, small-scale forest contractors, large timber companies, retired FS employees, and individual community members.

The SGPC works closely with the FS' GPNF South Zone National Environmental Policy Act (NEPA) Planner and Interdisciplinary Team (IDT) during the planning stage of vegetation management projects. In this advisory role, the group provides ongoing feedback during monthly meetings and often submits written comments during the scoping or other public comment periods within the NEPA process.

The Collaborative is also involved with the development of Stewardship Timber Sales that generate retained receipts which are used forest-wide for restoration projects such as meadow and fish habitat improvement, road drainage improvement, and invasive species treatment. The SGPC coordinates the annual review process for these restoration project proposals and offers recommendations to the District Ranger. Over the past two years, the group has broadened its programmatic scope to include sustainable recreation, project monitoring, and state-wide forest health planning efforts that are not reflected in this document.

Document Purpose

The purpose of this Zones of Agreement (ZOA) document is to provide the FS with a record of the SGPC's current areas of agreement on early seral habitat (ESH) creation within the South Zone planning unit of GPNF. Although not exhaustive, it highlights the Collaborative's rationale and recommendations for ESH creation where agreement has been reached and has not been reached. The FS may use these ZOA as sideboards when considering project locations and treatments. The SGPC is happy to provide additional input as project-specific concerns arise that are not covered herein. The Collaborative recognizes that the FS retains full decision-making authority and discretion to follow or deviate from this *ZOA for Early Seral Habitat Creation*.

In support of the overarching goal to increase the pace and scale of restoration on the South Zone of GPNF, this ZOA effort is guided by the following approach:

Comprehensive Decision-Making

The Collaborative is committed to using a comprehensive decision-making process that considers the best available science as well as ecological, economic, and social values.

Living Document

This ZOA is intended to be a living document that is reviewed annually and updated as the Collaborative reaches new areas of agreement that reflect best available science and community values.

Historical Record

This document serves as a historical record of the Collaborative's work on vegetation projects within the GPNF South Zone planning area. New members, partner organizations, and the FS can utilize this document to better understand the work and history of the SGPC. This ZOA does not reflect the full range of the Collaborative's projects and involvement on the forest.

ZOA: Early Seral Habitat Creation

The Role of Early Seral Habitat

Early seral habitat (ESH) is a habitat type common after large-scale disturbances (e.g., fire, insects, regeneration harvests). This habitat is characterized by grasses, forbs, shrubs, and an open canopy; and is simpler and more disorganized in terms of composition than subsequent seral stages. The later seral stages include mid seral, late seral, and the potential natural community stages. Healthy and resilient forested landscapes have a mix of seral stages represented. Not to be confused with *successional* (i.e., grass-forb, shrub-seedling, pole-sapling, young, mature, old growth) or *structural* stages/classes (i.e., stand initiation, stem exclusion, young forest multi-strata, understory reinitiation, old forest), seral stage relates to ecological change and complexity post-disturbance.

Along with many in the scientific community¹, the SGPC is concerned about the diminished quantity and quality of early seral habitat in moist westside forests in the Pacific Northwest.

The SGPC acknowledges the role that fire suppression and past timber harvest and post-harvest practices have played in creating the conditions present today. Early seral conditions are a natural structural component of western forests. Without natural fire regimes, much of the regenerating pre-canopy forest has passed through the open/early seral stage to become dense young or mid-seral forests lacking the structural complexity necessary for diverse plant and animal species. While the scientific understanding and appropriate response to these evolving conditions is still developing, we feel that the FS should begin acting now to recover this critical habitat type. Further delay or inaction on this front could exacerbate these already imbalanced and unhealthy conditions.

The Collaborative agrees that vegetation planning in the South Zone Planning Area of GPNF offers an opportunity to address the need for ESH as part of the landscape-scale restoration approach described above.

¹ For an overview of the science that informed this ZOA, see Appendix B: Early Seral Vegetation in Moist Forests of Western Washington and Oregon by Thomas A. Spies.

Methods Used for Reaching Agreement on ESH

In an attempt to find areas of agreement on the topic of ESH creation, we employed a multi-method approach. These included:

- Multiple ZOA Subcommittee meetings (1.5-hours)
- Multiple expert guest speakers
- Interpretive field trips
- An online survey

Over the past 1.5 years, the ZOA Subcommittee has worked hard to find areas of agreement related to ESH in general and specific to the Upper Wind project. This involved recurring (generally monthly) 1.5-hour meetings to discuss the topic as a group, often with FS staff present to answer questions. Prior to March of 2020, these meetings were held in-person in Stevenson, Washington, but have been held remotely via Zoom since. At these meetings, we discussed outstanding concerns, the science around ESH, and tried to find commonalities. The subcommittee's progress and ongoing initiatives, as well as the barriers they encountered, were subsequently shared with the full Collaborative at monthly SGPC meetings for broader input and discussion.

In addition to discussing ESH in ZOA Subcommittee and SGPC monthly meetings, the Collaborative hosted multiple guest speakers with areas of expertise specific to ESH. These guest speakers gave presentations to the full Collaborative on ESH and fielded questions.

ESH guest speakers (i.e., monthly meetings, field trips) included:

- Dr. Tom Spies (Oregon State University)
- Dr. Jerry Franklin (University of Washington)
- Dr. Mark Swanson (Washington State University)
- Dr. David L. Peterson (University of Washington)
- Dr. Matt Betts (Oregon State University)

In conjunction with the above methods, we also administered an online survey via Qualtrics to SGPC members to assess opinions and outstanding concerns related to ESH specific to the Upper Wind project. The questions and results of this survey can be found in Appendix E.

Synthesis of Areas of Agreement on ESH (as of 4/23/21)

- The SGPC supports ESH creation in plantations younger than 80 years old for these reasons:
 - ESH serves as critical habitat for many post-disturbance species
 - ESH is currently underrepresented on GPNF due to historic management practices and social/economic considerations
 - Creating more ESH would bring conifer plantations into closer alignment with natural landscape composition, functionality, and dynamics
 - Creating high-quality ESH would make for more resilient landscapes
- We recommend that any ESH creation project occur only in matrix stands younger than 80 years old and incorporate the following:
 - **Monitoring Plan**

We encourage the development of a detailed long-term monitoring plan in conjunction with the Collaborative and other stakeholders. We also encourage the FS to develop clear metrics for assessing success, including pre-harvest metrics/information, control areas, and a strong study design focusing on a few key variables.
 - **High-quality ESH**

We encourage the FS to create complex ESH that closely mimics natural ESH created by large-scale disturbances. Such habitat should retain the following attributes:

 - Downed wood
 - Legacy materials
 - Snags
 - Heterogeneity in patch size and structure
 - **Operating Season**

When possible, the Collaborative recommends that the FS use a condition-based threshold, rather than hard dates, for ESH creation. In particular, the FS should consider fall and winter logging when conditions are appropriate to provide environmental benefits (e.g., reduced soil compaction and vegetation impacts while the ground is frozen or snow-covered) and economic benefits (e.g., longer operating season could expand employment opportunities for local operators).

- **Invasive Plants**

We encourage the incorporation of invasive species mitigation measures where appropriate to reduce the recruitment and spread of invasive plants during and following ESH-related harvest activities.

- **Firewood and Biomass**

We encourage the FS to maximize firewood and biomass utilization practices that are of interest and benefit to the public. We recommend leaving firewood on landings or adjacent to open roads. However, the importance of creating high-quality ESH supersedes this point whereby we encourage the FS to prioritize leaving downed wood and legacy materials wherever ecologically appropriate.

- **Post-logging Practices**

We recommend post-logging practices that promote complex early seral habitat and that the FS consider a variety of management options (e.g., prescribed fire, snag retention, no tree planting, vary stocking level post-harvest, seeding with natives, etc.). We also suggest changing contracts to require large woody debris to be left on site where appropriate.

- **Multi-scale Planning Approach**

Work toward building landscape-level goals for different seral classes while experimenting with different treatment approaches at the stand scale. When thinking about prescriptions, we suggest considering stand features within a broader landscape context (e.g., do we need snags in a 5-acre patch of LSR in an area already full of natural snags?).

- **Patch Size/Scale**

Consider a contiguous patch that replicates a natural disturbance, is ecologically functional, and provides characteristics of complex ESH.

- **Variability of Treatments**

Distribute risk and enhance learning by comparing/monitoring different treatments and outcomes.

- **Layout**

We suggest the FS take a larger/landscape view when considering where to place ESH openings. We support creating meandering openings and edges. We also suggest not placing gaps/openings 30 feet from open roads and recommend sizable buffers from old growth, northern spotted owl habitat, and riparian management zones. To enhance meadows, we suggest creating ESH around existing openings. In mature shelterwood areas, the FS might consider cutting young trees in these stands to enhance huckleberry growth.

Synthesis of Areas Currently Lacking Agreement on ESH (as of 1/21/21)

- **Older Stands**

The Collaborative was unable to find agreement on the treatment of stands older than 80 years due to ecological concerns among some group members. How might the creation of ESH in older versus younger stands yield more/less complex and/or high/low-quality ESH?

- **Location**

Should new/additional ESH be created in areas where natural (e.g., fire-affected areas) or anthropogenic (e.g., regeneration harvests) ESH already exists, or solely in areas where this habitat type does not currently exist?

- **Monitoring and Metrics**

What would 'success' look like? How will this be measured? What are the specific metrics/indicators to be monitored (e.g., use of ESH by target wildlife/indicator species) and what are the details of the monitoring plan (e.g., duration, funding, re-treatment)?

- **Temporal Concerns**

How will ESH be managed over time (i.e., allow succession, maintain as ESH)? Will there be an early seral "stronghold" area that would be managed for continuous ESH? Or would it be more advantageous to have certain areas transition out of early seral in order to meet harvest objectives?

- **Natural Versus Created ESH**

How is the FS thinking about natural early seral habitat creation? With increasing frequency of high-severity fires (i.e., hotter, larger) in west-side areas as seen in Summer 2020, is there a need to manually create ESH? If forests may be more prone to naturally-created ESH (i.e., through climate change, drought, disease), how are we taking these changing landscape conditions into consideration in project areas?

- **Acreage/Scale**

What is the appropriate acreage/scale? Why is 500-600 acres optimal? What is the science and driving factors for this? Should the FS focus on expanding existing areas of ESH, or creating ESH in new areas, to achieve the chosen acreage?

Appendix A: SGPC Project History

The SGPC has been involved with nine FS vegetation management projects since 2009. This involvement has ranged from consultation to formal collaborative letters written and submitted during the public comment phase of the NEPA process.

Table 1: SGPC involvement in FS vegetation management projects

Project	Date
Pepper Cat Thin	2009-2011
Wildcat Thin	2009-2011
Cave Bear Restoration	2010-2012
Coyote Thin	2010-2012
Bear Creek Restoration Thin	2010-2015
Swift Thin	2012-2015
Upper White Salmon River Restoration	2014-2016
Middle Wind Thin	2017-2019
Upper Wind	2019-present

Appendix B: Early Seral Vegetation in Moist Forests of Western Washington and Oregon

Thomas A. Spies, Emeritus Scientist, PNW Research Station

Courtesy Professor, Oregon State University

What is it? Vegetation conditions that develop following major disturbances that kill or remove most or all of the tree canopy. Vegetation is dominated by non-tree life forms including grasses, forbs and shrubs. Legacies of the previous forest in the form of standing and fallen dead and scattered live trees and forest plants may be present. Vegetation is often patchy (i.e. complex) as a result of variation in site conditions and disturbance intensity. Meadows and shrublands maintained by fire or soil conditions (e.g. thin or wet soils) may also be considered early seral. Also known as: early successional, early successional forest, pre-forest, non-forest, grasslands, shrublands, woodlands.

Ecological value: Unique communities of plants and animals (including insects) that differ from those found in closed-canopy forests. Some species may need both forest and early seral (e.g. deer and elk which forage in open areas but use forest for cover). Unique ecosystem functions including high solar radiation, hydrological flows, nitrogen fixation, and flowering and fruit production. Early seral conditions can provide opportunities for new genotypes and species of trees and shrubs to establish that may be better adapted than existing individuals to current or future climate. There are no ESA listed early seral vertebrate species. In some areas butterflies that use meadows are listed.

Sources of early seral: Patches (at least 2 acres in size and typically hundreds to thousands of acres) of high-severity fire, blow down, logging units, landslides and debris flows, flood deposits, volcanic eruption and deposits. Early seral vegetation can persist following disturbance for 30 to more than 100 years until forest canopies close, depending on site conditions.

How much did we have historically: The amount of early seral in moist regions of western Washington and Oregon varied dramatically over the last 500 years from 0 to 100% of a typical 10,000 ac watershed. At larger scales (e.g. 100,000 to 1,000,000 ac) the amount of early seral over time was typically less than 10%, although higher percentages would have occurred periodically over several centuries.

Why is there a concern? There is probably much less early seral now than historically as a result of fire exclusion resulting from fire suppression. Ninety-eight percent of wildfires are suppressed before they become large enough to provide early seral, and past wildfires and disturbed areas have been planted and managed to promote rapid recovery of forest canopies. Clearcuts and plantations provide only limited characteristics of early-seral communities. However, research comparing early seral created by management and early seral from natural disturbance agents is lacking.

Do clearcuts provide early seral? Some physical and biological characteristics of early seral communities and ecosystems can develop following clearcuts created for timber production. However, ecological legacies such as dead wood and scattered live trees are typically absent, and forest management practices often eliminate non-tree vegetation after a few years, reduce heterogeneity of vegetation, and promote rapid forest canopy closure and tree growth.

Ecological considerations for managing for early seral: There are no established rules or formulas for determining how, where, when and if to create early-seral vegetation. Many factors will play into a management decision regarding early seral and in the end the decision is an informed judgement call.

Early seral creation may be motivated by ecosystem- and community-scale concerns and/or by needs of individual species or species groups. Factors to consider when considering management for early seral include; overall landscape-scale seral stage distribution and related management priorities; historical range of variation for area and amount of fire suppression in recent decades; type of forest that is converted to early seral (e.g. plantations, young forest, older forest); habitat needs of listed species (both early and late successional); use of fire (either after mechanical treatment or as the primary tool for creation) in creating early seral; likelihood that early seral will be created by natural disturbance agents; topography and soils, climate change adaptation goals; silviculture method including use of fire; and patch size. Within the moist forests of the Northwest Forest Plan area, creation of early seral from old-growth forests is generally not considered consistent with NWFP priorities, though there may be exceptions. Given the complexity of the issue and uncertainties around the benefits of mechanically-created early seral vegetation, monitoring and adaptive management are considered an important part of a scientifically-based program of early-seral management.

For more information about the current science of early seral vegetation in moist forests see Northwest Forest Plan Science Synthesis online:

<https://www.fs.usda.gov/pnw/page/synthesis-science-inform-land-management-within-northwest-forest-plan-area>

Location and page numbers of text about early seral in the science synthesis:

Executive Summary

Forest conservation is more than old growth:	36-44
General conservation implications:	174-177

Volume 1, Chapter 3

Succession and forest dynamics:	115-122
Historical landscape dynamics:	123-124
Fire suppression effects:	139
Use of historical ecology in conservation:	143-146
Ecosystem function and succession:	146-147
Restoration:	168-170
Post-fire salvage:	177-181
Restoration summary:	187-189

Volume 2, Chapter 6

Other species:	411-412
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Volume 3, Chapter 12

Fire exclusion effects on early seral:	925-927
Tradeoffs:	928-930
Table 12-1	964
Successional diversity:	959-960
Uncertainties and research needs:	968-969

Appendix C: Past SGPC Project Comment Letters

Coyote Thin Comment Letter: March 5, 2012

March 5, 2012

To: Erin Black
South Zone Planning Team Leader Mt. Adams Ranger District
2455 Hwy 141
Trout Lake, WA 98650

From: South Gifford Pinchot Collaborative
P.O. Box 768 Carson, WA 98610

RE: Coyote Thin; File code 1950/2430

The South Gifford Pinchot Collaborative supports the Coyote Thin project on the Mt Adams Ranger District of the Gifford Pinchot National Forest. We support this commercial thinning project as a means to manage stand development within matrix, LSR, and riparian reserve allocations. As a collaborative group working with the Mt Adams Ranger District, we appreciate the time and energy District personnel have committed to working on Coyote Thin and with the collaborative.

In response to the Scoping Letter dated February 3, 2012, we submit the comments below concerning Coyote Thin.

- We encourage the Forest Service Planning team to consider the use of both stewardship contracting and timber sales to complete work within the scope of this project.
- We encourage variable density thinning to put these stands on a trajectory to more closely resemble natural stands and a healthy resilient forest. We encourage retention of legacy trees, downed wood, and use of skips, gaps and use of clumping as is reasonably possible. We encourage defining the desired future condition that the forest would be heading towards with this project.
- When addressing riparian reserve thinning, explain clearly the objective of the proposed action and the desired future condition.
- To improve economic viability, consider:
 - A range of sale sizes grouped by similar species and product sorts
 - Encourage contractor-friendly requirements
 - Use as long an operating season as feasible
 - Consider multi-year sales to allow contractors to take advantage of market conditions
- Maximize firewood and biomass utilization practices that are of interest and benefit to the public.

- We encourage wildlife forage seeding on closed roads and in created openings, where feasible.
- We strongly recommend closing non-systems/user created roads, especially those that present an obvious threat to public resources.
- We agree with decommissioning system roads that access LSR which will not be needed for future forest management activities and where the FS Planning team identifies roads having low significance to multi-use recreation.
- We agree that systems roads that go into matrixland should not be decommissioned if future management action is desired in the stand within a foreseeable time period. They may be closed but maintain them as system roads for future needs.
- We encourage hazard tree removal along recreation trails and travel corridors, including winter sports trails.
- Consider opportunities for visual enhancement along road corridors such as openings or thinning that will allow visitors to see into the forest.

In closing, we encourage and support Coyote Thin as a project designed to improve forest stand conditions and forest health that includes:

- Increasing stand resiliency
- Increasing viable plant and wildlife habitat
- Bringing conifer plantations more closely into alignment with natural stand dynamics
- Increasing growth and yield in plantations on matrix designated land
- Providing multiple economically viable timber sales

We will be glad to assist in additional educational outreach to the public in the form of public meetings and field trips in various communities to showcase the benefits of Coyote Thin.

Thank you for your consideration,

South Gifford Pinchot Collaborative

Bear Creek Restoration Thin Comment Letter: April 15, 2015

April 15, 2015

To: Erin Black

South Zone Planning Team Leader Mt. Adams Ranger District

2455 Hwy 141

Trout Lake, WA 98650

From: South Gifford Pinchot Collaborative

RE: Bear Creek Restoration Thin File code 1950/2430

The South Gifford Pinchot Collaborative supports the Bear Creek Restoration Thin project on the Mt. Adams Ranger District of the Gifford Pinchot National Forest. We support this commercial thinning project as a means to restore the forest and manage stand development within LSR and riparian reserve allocations. We appreciate the time and energy District personnel have committed to working on Bear Creek Restoration Thin and with the collaborative and the creative use of an Enterprise Team to complete the project.

The South Gifford Pinchot Collaborative has spent considerable time and energy working with the Gifford Pinchot NF since 2010 on a forest restoration project in the Bear Creek watershed. The group received funding from Title II South GP Resource Advisory Committee in 2010 and 2012 to perform stand exams and pre-NEPA surveys in the area. Working with Erin Black, we sub-contracted to various specialists and contributed funding to Forest Service staff to perform fieldwork and write reports. Many SGPC members volunteered time and work as well. As noted in an early summary of the project while seeking additional funding, the initial objectives of the Bear Creek Restoration project were to:

- Restore and expedite the development of old-growth characteristics on 939 acres of Douglas-fir stands in the Bear Creek Watershed.
- Restore 41 acres of Oregon white oak habitat.
- Improve native shrub habitat by eliminating noxious weeds
- Improve hydrologic processes to function more naturally in the Bear Creek watershed, the domestic water supply for the community of Carson, WA and the lower Wind River Valley.
- Improve existing road surfaces, fill slopes, ditches, and culverts along portions of Forest Roads 68 and 6808.

- Restore hydrologic connectivity and function by decommissioning 3.4 miles of forest roads

The project has evolved over the years and fewer acres will be restored due to complicating land designation with the CRGNSA. However, our objectives are basically the same. In response to the Scoping Letter and scoping Project Document dated November 17, 2014, we submit the following comments concerning Bear Creek Restoration Thin.

The South Gifford Pinchot Collaborative agrees on the below points:

- We encourage variable density thinning to put these stands on a trajectory to more closely resemble natural stands and a healthy resilient forest. We encourage retention of legacy trees, downed wood, and use of skips and gaps as prescribed. We do not support retaining any conifer or hardwood species in gaps and use of clumping as is reasonably possible. We encourage defining the desired future condition that the forest would be heading towards with this project.
- We support the riparian designation and management within the riparian zones for the Bear Creek Project as outlined in the chart below.

Feature	No thin buffer (all thinning treatments)	Equipment Limitation Zone* (measured from outer edge of no thin buffer)
Perennial Fish bearing streams and ponds	130'	50'-75'
Perennial Non-Fish bearing streams and ponds	100'	50'-75'
Intermittent Streams	100'	50'-75'
Ephemeral Streams	15'	50'-75'
Seeps and Springs	100'	50'-75'
Vernal Pools	100'	50'-75'
Wetlands Greater than 1 acre	100'	50'-75'
Wetlands Less than 1 acres	100'	50'-75'

*Equipment Limitation Zones (ELZ) are areas 50'-75' from the outer edge of the no thin buffer. These areas will be thinned as per the FS prescriptions, but no equipment shall be allowed within them. Yarding and skidding corridors will be allowed to cross ELZ's and no cut buffers, but they should be minimized, approved by the FS prior to use, and rehabilitated after skidding and/or yarding is completed. Non-designated timber felled within the no cut buffers for skid trails and skyline corridors shall be felled and left on-site for downed wood recruitment.

- Harvesting non-commercial sized trees in plantations to improve Oregon white oak habitat. If non-commercial trees cut create a slash concentration, brush should be limbed, lopped and scattered. A buffer of 35 feet around oak stands should be created by removing all conifers.
- When addressing riparian reserve thinning, explain clearly the objective of the proposed action, the desired future condition.
- Maximize firewood and biomass utilization practices that are of interest and benefit to the public.
- We agree with replacing culverts as needed for aquatic restoration except at culvert at milepost 3.5 on road 6808. The culvert at the slide area (fire water source) should be removed and not replaced after the timber sale is completed by stewardship or retained receipts.
- We agree with rocking system roads to improve watershed health, prevent the possibilities of soil runoff and maintain the road surfaces. Specific roads that should receive a rock lift are 6800 and 6808.
- We suggest not requiring falling of trees for downed woody material or creating snags as a requirement of the Timber Sale contract. However, we support including snag and downed wood prescriptions in the NEPA document to ensure they are implemented at a later date, as described here. As an alternative approach, wait a year or two to assess how many trees fall naturally. Retained Receipts, Stewardship or KV funding could be utilized to fall trees later, depending upon the type of sale. To ensure this occurs, it is essential that the Stewardship or KV plan document the need to create downed woody material and snag creation.
- We encourage wildlife forage seeding on closed roads and in created openings, or exposed soil where feasible.
- We suggest closing and stabilizing roads 6830 and 6800602, maintaining them as level 1, and seeding with wildlife forage seed in lieu of decommissioning since they access units proposed for future thinning and do not have adverse aquatic impacts.
- To improve economic viability:
 - Encourage contractor-friendly requirements
 - Maximize operating season as feasible

The South Gifford Pinchot Collaborative could not reach agreement on:

- The width of the buffer for intermittent streams lacking riparian characteristics
- Decommissioning Forest Road 6835

The South Gifford Pinchot Collaborative will utilize Bear Creek Restoration as a learning opportunity. We will monitor riparian areas during and after sale activity to document effects of yarding and skidding as suggested above. We will also monitor the potential development of downed wood and snags over a three-year period to assess how much is created naturally.

We will be glad to assist in additional educational outreach meetings and field trips for the public to showcase the benefits of Bear Creek Restoration Thin.

Thank you for your consideration,
South Gifford Pinchot Collaborative

Swift Thin Comment Letter: April 16, 2015

April 16, 2015

To: Mosé Jones-Yellin, Mt. Adams District Ranger, Mt. Adams Ranger District
2455 Hwy 141
Trout Lake, WA 98650

From: South Gifford Pinchot Collaborative

RE: Swift Thin Project File code 1950/2430

The South Gifford Pinchot Collaborative generally supports the Swift Thin project on the Mt. Adams Ranger District of the Gifford Pinchot National Forest as a means to restore the forest and manage stand development within LSR, and riparian reserve allocations. Unfortunately, there was not sufficient time in the 30 day response requirement for the collaborative to form a committee to respond completely. Our response below is broad, based on other projects where there have been thorough discussion and compromise.

The South Gifford Pinchot Collaborative agrees on the below points:

- We encourage variable density thinning to put these stands on a trajectory to more closely resemble natural stands and a healthy resilient forest. We encourage retention of legacy trees, downed wood, and use of skips and gaps as prescribed. We do not support retaining any conifer or hardwood species in gaps and use of clumping as is reasonably possible. We encourage defining the desired future condition that the forest would be heading towards with this project.

We support the riparian designation and management within the riparian zones for the Swift Thin Project as outlined in the chart below.

Feature	No thin buffer (all thinning treatments)	Equipment Limitation Zone* (measured from outer edge of no-thin buffer)
Perennial Fish bearing streams and ponds	130'	50'-75'
Perennial Non-Fish bearing streams and ponds	100'	50'-75'
Intermittent Streams	100'	50'-75'
Ephemeral Streams	15'	50'-75'
Seeps and Springs	100'	50'-75'
Vernal Pools	100'	50'-75'
Wetlands Greater than 1 acre	100'	50'-75'
Wetlands Less than 1 acres	100'	50'-75'

*Equipment Limitation Zones (ELZ) are areas 50'-75' from the outer edge of the no thin buffer. These areas will be thinned as per the FS prescriptions, but no equipment shall be allowed within them. Yarding and skidding corridors will be allowed to cross ELZ's and no cut buffers, but they should be minimized, approved by the FS prior to use, and rehabilitated after skidding and/or yarding is completed. Non-designated timber felled within the no cut buffers for skid trails and skyline corridors shall be felled and left on-site for downed wood recruitment.

- Maximize firewood and biomass utilization practices that are of interest and benefit to the public.
- We agree with replacing culverts as needed for aquatic restoration.
- We agree with rocking systemroads to improve watershed health, prevent the possibilities of soil runoff and maintain the road surfaces.
- We suggest not requiring falling of trees for downed woody material or creating snags as a requirement of the Timber Sale contract. However, we support including snag and downed wood prescriptions in the NEPA document to ensure they are implemented at a later date, as described here. As an alternative approach, wait a year or two to assess how many trees fall naturally. Retained

Receipts, Stewardship or KV funding could be utilized to fall trees later, depending upon the type of sale. To ensure this occurs, it is essential that the Stewardship or KV plan document the need to create downed woody material and snag creation.

- We encourage wildlife forage seeding on closed roads and in created openings, or exposed soil where feasible.
- We encourage the treatment of invasive weeds within stands along roads before and after logging.
- We support felling of hazard trees along roads used for timber hauling and along recreation trails.
- To improve economic viability:
 - Encourage contractor-friendly requirements
 - Maximize operating season as feasible

The South Gifford Pinchot Collaborative did not have sufficient time and involvement in the project to discuss areas of possible contention including:

- Proposed early seral treatment in matrix allocations
- Construction of new temporary roads
- Decommissioning of Forest Roads

If any of the proposed project will become Stewardship sales, SGPC would like to be involved with making recommendations for restoration projects, as noted in the NEPA roadmap that was agreed upon early in the project timeline history.

Thank you for your consideration,

South Gifford Pinchot Collaborative

Upper White Salmon Restoration Comment Letter: December 16, 2016

December 16, 2016

To: Erin Black

South Zone Planning Team Leader Mt. Adams Ranger District

2455 Hwy 141

Trout Lake, WA 98650

From: South Gifford Pinchot Collaborative

RE: Upper White Salmon Vegetation Project

Thank you for the opportunity to share our concerns throughout your process of developing the Upper White Salmon Vegetation Project Draft Environmental Assessment (EA). The South Gifford Pinchot Collaborative (SGPC) has discussed a range of key management issues, and this letter offers a summary of our areas of agreement on these issues. Where full consensus was not reached for a topic, the different viewpoint is noted in that section.

Objectives of the Upper White Vegetation Project

Overall, SGPC supports the objectives for this project, and acknowledges our role in the allocation of stewardship receipts, as detailed below.

- Thin older plantations within the planning area to modify stand development and trajectory toward the land allocation objectives.
- Manage a portion of the native stands to improve the landscape's resiliency to fire, insects, and disease, where impacts of a high magnitude would impede or delay the attainment of land allocation objectives. Focus treatments in the grand fir ecological zone, where rapid change in forest cover has occurred in the last decade, and continued change is forecast. Consider a variety of treatments, including selective tree removal, non-commercial thinning, mechanical fuel treatment, prescribed fire, and tree planting.

It is anticipated that most of these treatments will be implemented by commercial timber sales, and any revenue generated by the government will be used to implement the other treatments to the extent possible under stewardship or K-V authorities. The collaborative will have input on the allocation of stewardship receipts

Plantation Thinning

The plantation thinning here is similar to what the Forest Service and SGPC have worked on in the Pepper Cat, Coyote, Swift, and Bear Creek projects. Needs and benefits are similar. We recognize that treatments in the Upper White area within the grand fir ecological zone will differ in desired species, both in overstory and understory, and have a greater need to manage slash to address fire hazard.

Native Stands with Individual Tree Removal

SGPC acknowledges that big, old ponderosa pines are a key component to retain in these native stands given these factors: their relative sparseness in the landscape as compared to historical conditions, their important role in achieving the desired forest condition, their fire resistance, and their need for seed dispersal. Removing other trees in their immediate vicinity reduces competition for moisture to maintain their vitality and isolates their crown, a consideration for fire spread. We support this type of crown thinning as a component of the native stand treatments.

SGPC recognizes that most of the threat of stand disturbance is a result of high levels of grand fir that have established here since active fire suppression began in the early 1900s. Thus, we support the Forest Service's proposal as described in the following paragraph:

Grand fir will be the primary tree to be removed in these native stands, to provide space for existing ponderosa pine, Douglas-fir, and western larch or their regeneration. Smaller Douglas-fir may be removed (by thinning from below) where they encroach upon large ponderosa pine trees or in stands, or portions of stands, where, after removing most grand fir, stocking levels would still be too high to maintain overall stand growth and vitality. Through individual tree removal and prescribed burning in native stands to provide space for ponderosa pine, Douglas-fir, and western larch or their regeneration, forage for deer and elk will increase.

Big Trees

The tree diameters and ages mentioned here are descriptive only, intended to clarify the range of tree sizes and ages to be removed. They are not intended to be limits applied to the project as a whole. The collaborative recognizes the variety of situations that can occur on the ground, and that flexibility is needed to best meet the desired outcomes.

Big trees of all species are of value to people and a component of a late-successional forest, an objective condition across much of the planning area (LSR, Riparian Reserve, and critical spotted owl habitat). However, the removal of grand fir and some Douglas-fir is paramount to achieving the resiliency objectives of this project.

Most of the grand fir trees in these native stands are less than 90 years old, having established post fire-suppression. Some are as large as 36” dbh, but the majority is between 12-24.” The amount of grand fir to be left will be largely determined by baseline needs for spotted owl foraging or dispersal function, Riparian Reserves, botany buffers, strategic skips, and snag and down log needs. Outside of crown thinning on ponderosa, expect all grand fir greater than 30”dbh to be left. In some stands, grand fir larger than 20” will be left.

Douglas-fir removal, either in crown thinning or stands with too high of a Douglas-fir density, has a preliminary range of 20-24” for the largest trees to be removed. Douglas-fir in the 90+ year-old cohort are not a target for removal to meet resiliency objectives. These older trees are generally indicated by bark appearance if not by diameter.

Virtually all ponderosa pine, western larch, western red cedar, western white pine, Englemann spruce, red alder, black cottonwood, and quaking aspen will not be removed from native stands, with the exception of those trees located within needed landings and temporary roads. There may be some additional exceptions for pockets of dense ponderosa or lodgepole pine that could benefit from thinning (trees to be removed will likely be less than 20” dbh).

One different view on Big Trees, expressed by Cascade Forest Conservancy (CFC) and Friends of Mount Adams, relates to the language in this section. They suggest that, for clarity, the numbers included here should be written as “guidelines.” They also note that they, and possibly other collaborative members, will monitor either tree marking before logging operations or conditions post-harvest.

Riparian Management

The collaborative supports the Upper White Vegetation Riparian Reserve Treatment Summary as described in the November 17th meeting with one modification. We recommend that the Forest Service change the 30 ft. buffer width for wetlands less than one acre (pg. 2 of Summary document) to the following: At the discretion of the Forest Service, thinning may occur between 30-60 ft. of the proximity to wetlands less than one acre.

Northern Spotted Owl (NSO) Management

SGPC supports the Upper White Salmon Vegetation Project proposed action for management of NSO habitat in the project area.

Undocumented Roads

The collaborative recommends that the Forest Service should identify undocumented roads within the Upper White project area and prioritize which should be closed, where appropriate, to mitigate resource damage.

Prescribed Fire Treatments

SGPC recognizes that prescribed fire is needed to protect values at risk in this landscape and promote resistance and resilience. Prescribed fire treatments will reduce surface fuel loads and stocking of grand fir seedlings and saplings, while facilitating regeneration of ponderosa pine, Douglas-fir, and Western larch.

We support the initial proposed action as described here:

- The initial proposed action identified both those stands that had previous mechanical fuel treatments under the Gotchen EIS and other stands that have had high rates of mortality, provided that mechanical work can be completed prior to these treatments. There will be a need for pre-ignition work on most stands, including construction of firelines, re-opening of old roads for engine access, slash pull-back on some big ponderosa pines, and small tree thinning around some big trees.
- Expected results are to be variable, with some areas unburned and other areas burned at high intensity, causing big tree mortality. The desire is to limit mortality from prescribed fire through pre-fire stewardship where possible. Stewardship contracting can help fund this type of work.
- There are pros and cons associated with spring and fall burning, and the Forest Service will determine the best time period for burning. Available funds and authorities will be pursued to achieve the project's fire objectives.

Roads Access and Trails

Where temporary roads are needed, the collaborative suggests locating them on prior disturbance areas (e.g., old temporary roads, skid trails, or decommissioned roads) with no stream crossings and no trails.

Where conflicts occur, the Forest Service interdisciplinary team should evaluate trade-offs to determine the optimal temporary road locations with least cost and impact.

SGPC members are neutral or supportive of using the Morrison Trail and other trails as temporary roads during harvest activities in order to re-use old roads instead of building new ones. If trails are used as temporary roads, roads should be rehabilitated in a fashion that facilitates their subsequent tread reconstruction (e.g. fluff the surface and don't pile slash on it). If trails are impacted, closures should be minimized and trail tread re-established in as good, or better, condition within the shortest time possible. Treads should be more sinuous, aesthetically pleasing, and better draining post-harvest.

Trail reconstruction associated with trail use for temporary harvest roads should be included in the Upper White EA. Trail re-establishment projects should be high priorities in stewardship or K-V plans to improve the likelihood of funding.

If multiple trails are impacted, implementation should be staggered so that some loops out of Mt. Adams Horse Camp are always available (e.g. coordinate trail closures to limit impact). The Forest Service should inform Back Country Horsemen, Wild Women Marathon, endurance riders, and mountain bikers of upcoming harvest activity and trail closures. In addition, the agency should consider connecting with volunteer groups to assist with re-building trails, with the understanding that Washington Trails Association will not be available to support this work. SGPC recommends that the Forest Service consider incorporating permanent reroutes of roads-to-trails—to avoid future road conflicts—as part of the Upper White EA.

Operating Season

The collaborative recommends that the Forest Service should use a condition-based threshold, rather than hard dates, for management activities within the Upper White project area. In particular, the Forest Service should consider over-the-snow logging, when conditions are appropriate, to provide environmental benefits (e.g., reduced soil compaction and lessened vegetation impacts when ground is frozen or snow-covered) and economic benefits (e.g., longer operating season could expand employment opportunities for local operators and eliminate the time and extra work involved with obtaining waivers that are currently required to work before or after the July 15 through September 30 time period).

Systems Roads Improvements

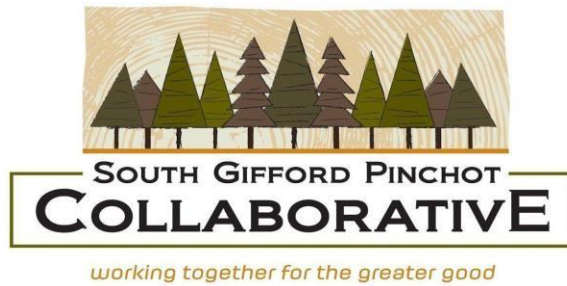
SGPC suggests that the Forest Service complete these improvements to systems roads utilized in Upper White project sales: roads should be rocked, improve culverts if needed, complete ditching and brushing, and improve road signage.

Lastly, road restoration was brought up during the collaborative's discussion of this project, but we did not have time to identify agreement. Therefore, we include it here only as a record of our process, not as record of any agreement reached. While recognizing that the Forest Service has proposed no permanent road closures in the

Upper White project area and is, instead, focusing on the Wind River area for potential road closures, Cascade Forest Conservancy suggests that there are high priority roads in the Upper White Planning Area and recommends that the Forest Service should, at the least, analyze road closure possibilities so that NEPA is taken care of when funds become available. Discussion points brought up by CFC include the economic benefits of road restoration work and prioritizing this work for local contractors. Again, SGPC is offering no consensus agreement on this topic.

We hope that this information will aid the Forest Service in completing the EA for the Upper White Salmon Vegetation Project. 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,
South Gifford Pinchot Collaborative



July 24, 2020

To: Bengt Coffin

South Zone Planning Team Leader Mt.
Adams Ranger District

2455 Hwy 141

Trout Lake, WA 98650

From: South Gifford Pinchot Collaborative

Re: Upper Wind Vegetation Management Plan, Scoping Summary of Positions

Summary

The South Gifford Pinchot Collaborative (SGPC) has reviewed the Upper Wind Forest Management project on the Mt. Adams Ranger District of the Gifford Pinchot National Forest as outlined in the released Scoping Brochure. We appreciate the time and energy FS District personnel have committed to working on this project and with the Collaborative. The SGPC supports the majority of this project as it is written with exception to the proposed early seral habitat creation in the 120-year old (yo) stands where full consensus has not yet been reached.

The South Gifford Pinchot Collaborative agrees on the following points:

- We fully support the plan with exception of the early seral habitat creation where full consensus has not yet been reached.
- Where appropriate, we encourage thinning stands to more closely resemble natural stands and a healthy resilient forest. In specific, we encourage retention of legacy trees and downed wood.
- We encourage clearly defining the desired future conditions that the forest would be heading towards with this project.
- When addressing thinning in riparian reserves and areas of high concern (e.g., sensitive habitat) explain clearly the objective of the proposed action, desired future conditions, and

how success will be evaluated/measured.

- We suggest maximizing firewood and biomass utilization practices that are of interest and benefit to the public.
- We support including explicit snag and downed-wood prescriptions in contracts.
- We encourage wildlife forage seeding on closed roads and in created openings or exposed soil where appropriate.
- We strongly encourage the development of a monitoring plan to assess project impacts and conditions related to biodiversity and vegetation patterns, particularly in areas where early seral habitat creation is planned.
- Timber sales used for ecological purposes should be as economically viable as possible. To improve economic viability:
 - We encourage contractor-friendly requirements.
 - We encourage maximizing the operating season (i.e., year-round harvesting) only when sedimentation and erosion impacts are not likely to be detrimental.
- We recommend a multi-scale planning approach: Work toward building landscape-level goals for different seral classes, while experimenting with different treatment approaches at the stand scale. When thinking about prescriptions, consider stand features within a broader landscape context. For example, do you need snags in a 5-acre patch on a particular project within LSR when the area is full of snags?.
- The Forest Service should disclose whether a timber sale is ecologically, socially, and/or economically driven.
- Variability of treatments: Distribute risk and enhance learning by comparing different treatments.
- In relation to early seral habitat creation, the FS should consider a variety of management options (e.g., prescribed fire, snag retention, no tree planting, vary stocking level post harvest, seeding with natives, etc.) to create more complex habitat.
 - Take a larger, landscape view when considering where to place an early seral opening.
 - Create meandering openings and edges. Consider not placing all gaps/openings 30 feet from the road.
 - Enhance meadows by creating early seral around existing openings.
 - Adhere to Jerry Franklin's recommended retention of approximately 30% of the preharvest stand as patches.

Outstanding Areas of Concern

The South Gifford Pinchot Collaborative could not reach agreement on early seral habitat creation in 120 yo stands. However, along with many in the scientific community, the Collaborative *is* concerned about the diminished quantity and quality of early seral habitat in moist west-side forests in the Pacific Northwest. We acknowledge the role that fire suppression and past timber harvest and post-harvest practices have played in creating the conditions we see today. In fact, the Collaborative has hosted/scheduled a number of field trips and guest speakers with relevant areas of expertise (e.g., Gerry Franklin, Tom Spies, James Johnston, John Bailey, Matt Betts, Matt Reilly, Dave Peterson, Mark Swanson) to better understand this issue.

Although the majority of the Collaborative supports the FS' proposed early seral habitat creation,

some members have communicated serious concerns primarily surrounding the planned regeneration harvest in the oldest stands (i.e., 120-yo). Several 1.5-hour subcommittee meetings were also conducted over the past year with a group of six SGPC members selected based on diversity of interests to discuss these concerns and find zones of agreement (ZOA). These meetings yielded a number of insights and have uncovered areas of agreement (e.g., support for the FS' proposed treatments in younger and middle-aged stands) and highlighted remaining concerns and questions. Alternative plans for the 120 yo stands (next paragraph) were proposed by Cascade Forest Conservancy (CFC) and the ZOA Subcommittee at recent meetings and then presented to the full Collaborative for feedback.

CFC's alternative proposal suggested thinning (i.e., versus regeneration harvest) half of the older units and leaving the other half untouched, and also requested that this plan *not* be considered a pilot project for expedited future early seral implementation. In an attempt to reach consensus, the ZOA Subcommittee brainstormed other ideas such as trial-runs in the 120 yo stands consisting of either: (a) 40-50 acres of regeneration harvest or (b) half of the original proposed acreage. CFC also requested that any trial-run target contiguous mid-aged and younger units and involve subsequent monitoring prior to harvesting the remaining acreage. To date, however, monitoring plans (e.g., logistics, focal indicators) and metrics used to assess project efficacy (i.e., what 'success' looks like) are yet to be determined but are of utmost importance.

To better understand any remaining concerns and the diversity of opinions on early seral habitat creation in these older stands, a Qualtrics online survey was created and administered to SGPC members. The survey measured self-assessed knowledge about early seral habitat, familiarity with the Upper Wind planning area, the relevance/importance of the issue, acceptability of the FS' proposed plan and alternative plans (i.e., CFC, ZOA), and demographic items related to SGPC membership.

Based on survey results (see Appendix) and the aforementioned meetings, the following points still need clarification:

- What are the specific conditions we're seeking to create as it relates to the definition of "complex" early seral habitat?
- How will the Forest Service manage the project area for early seral habitat over time (e.g., length of time and post-harvest practices)?
 - Are there future plans to come through and do regeneration harvest in previously thinned stands in the watershed?
 - How might these plans relate to (or differ from) what is currently proposed in Upper Wind?
 - What are the benefits and tradeoffs of early seral versus older stands (e.g., habitat, ecosystem services) relative to these 120 yo stands?
 - How might the Survey and Monitoring findings affect these proposed actions?
 - Need a detailed monitoring plan for early seral habitat to determine effectiveness of treatments in meeting restoration objectives.
 - Concerns about setting precedent in terms of acreage or other factors (i.e., don't want to be pilot project)

At our most recent ZOA Subcommittee meeting, members discussed the best course of near-term action and decided to summarize member opinions on this issue for FS Staff scoping/planning needs. The subcommittee will continue working on finding areas of agreement on this issue and SGPC looks forward to providing further input after the environmental assessment has been conducted and as our members' opinions continue to evolve. We will be glad to assist in additional educational outreach meetings and field trips for the public to showcase the benefits of the Upper Wind Vegetation Management Plan.

Thank you for your consideration and efforts,

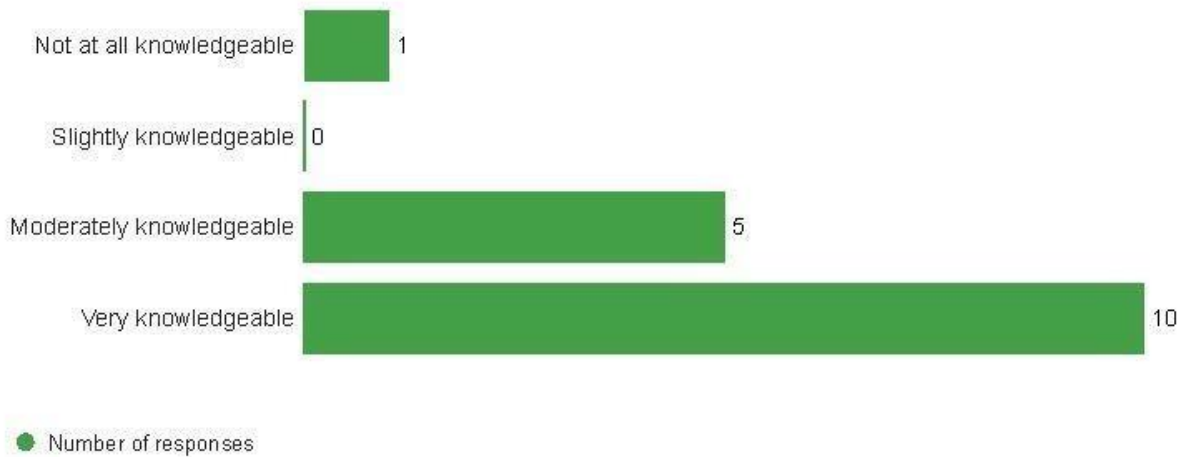
South Gifford Pinchot Collaborative

Appendix D: Acronyms

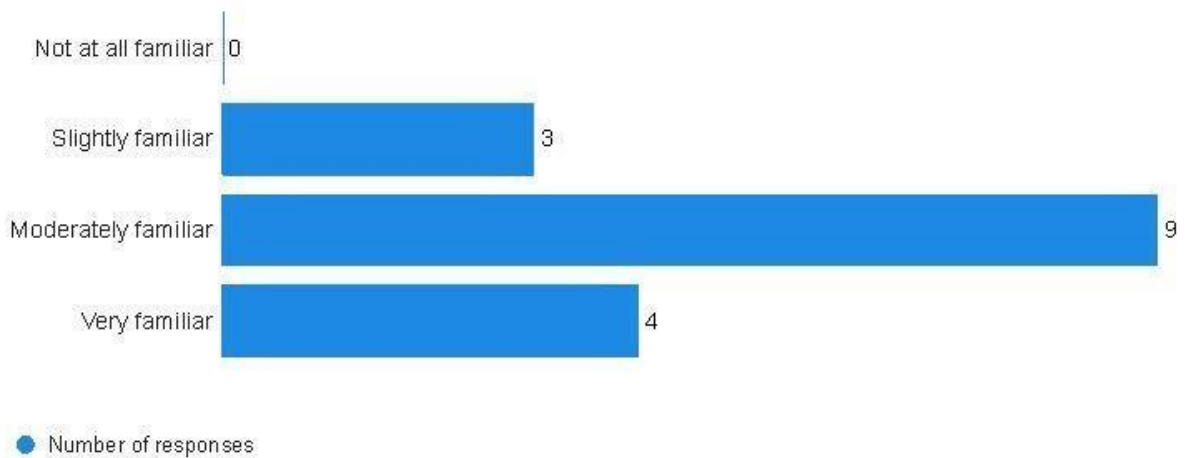
ACS	- Aquatic Conservation Strategy
CFR	- Code of Federal Regulations
DBH	- Diameter at Breast Height
DxD	- Designation by Description
DxP	- Designation by Prescription
EA	- Environmental Assessment
EIS	- Environmental Impact Statement
FS	- Forest Service
FSM	- Forest Service Manual
ESH	- Early Seral Habitat
GPNF	- Gifford Pinchot National Forest
IDT	- Interdisciplinary Team
KV	- Knutson-Vandenberg program
LSR	- Late Successional Reserve
NEPA	- National Environmental Policy Act
NSO	- Northern Spotted Owl
NWFP	- Northwest Forest Plan
SGPC	- South Gifford Pinchot Collaborative
TEPL	- Threatened, Endangered, Proposed, and Listed
ZOA	- Zones of Agreement

Appendix E: Survey Results for SGPC Member Opinions on ESH and Upper Wind Vegetation Management Plan

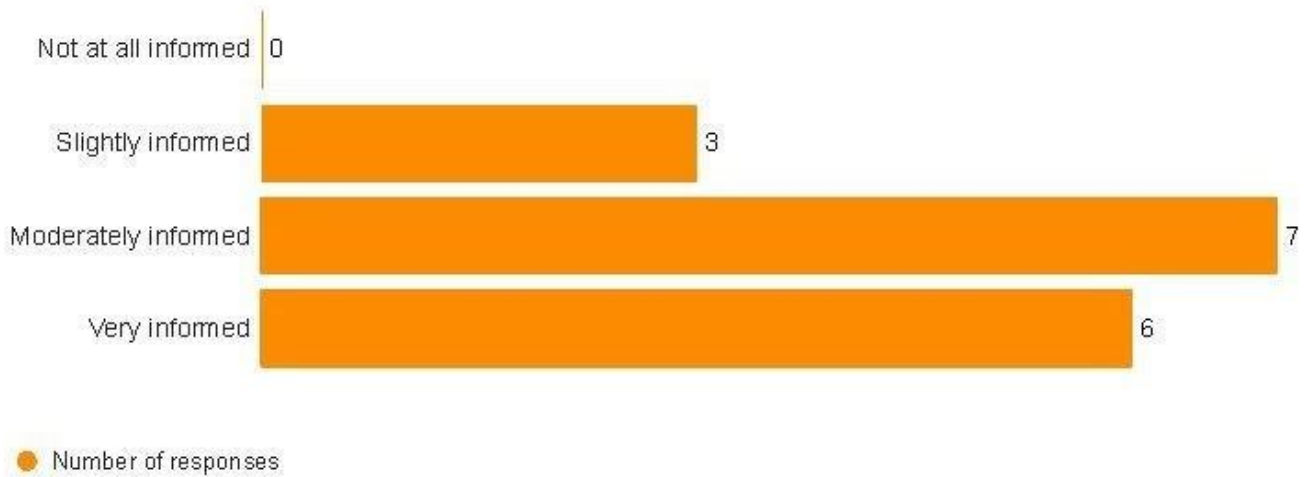
1a - How knowledgeable do you feel about the issue of early seral habitat?



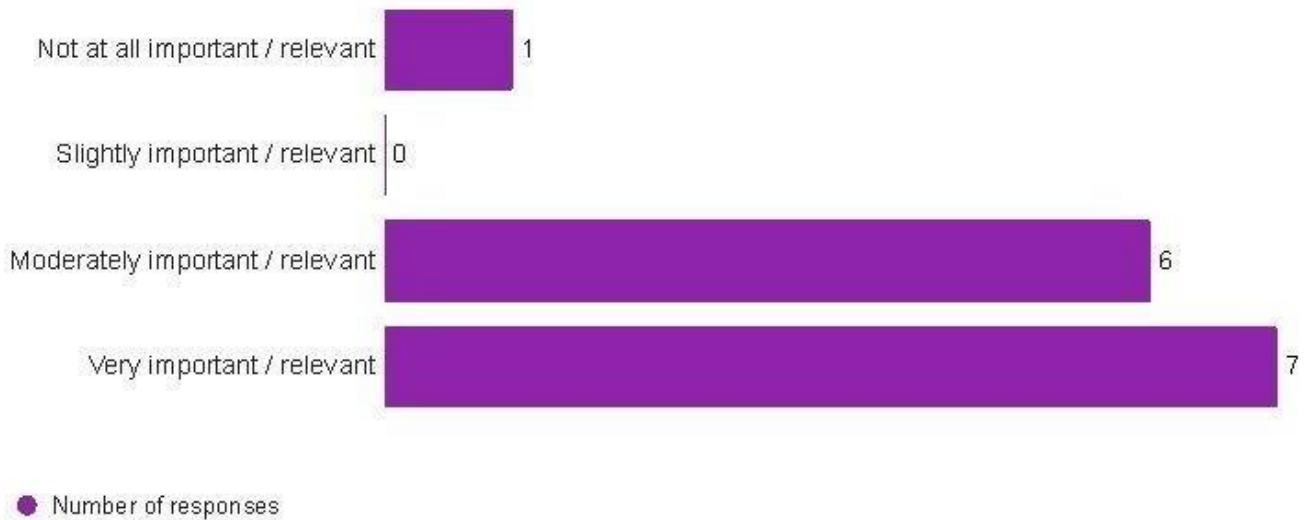
2a - How familiar are you with the Upper Wind planning area?



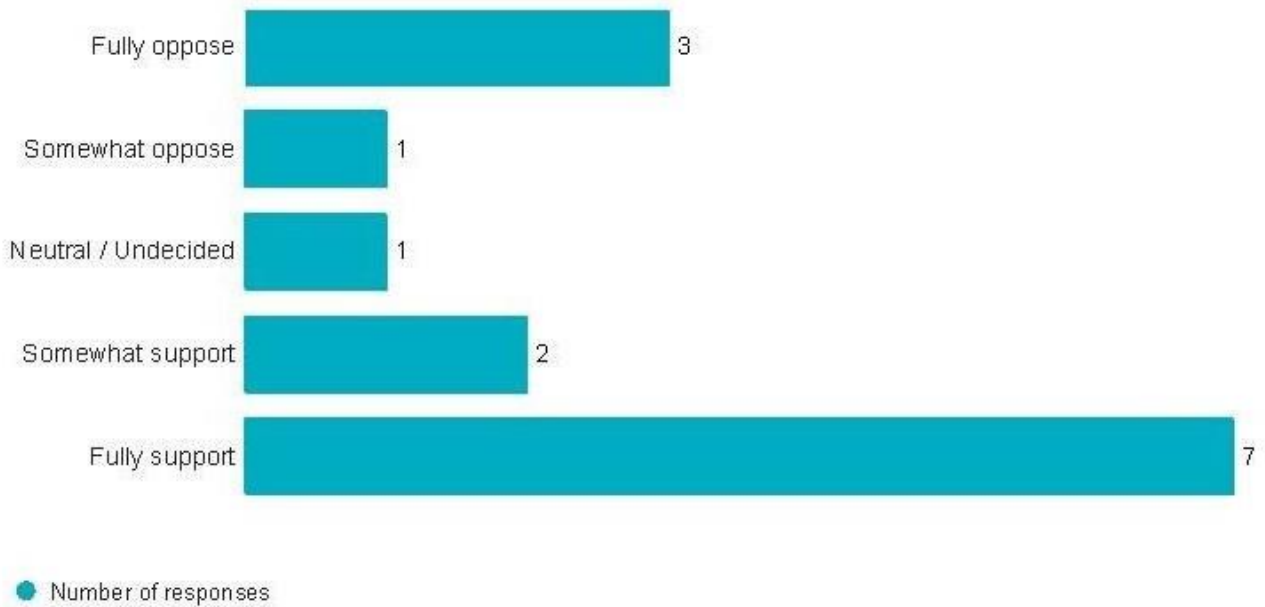
3a - How informed do you feel about this issue?



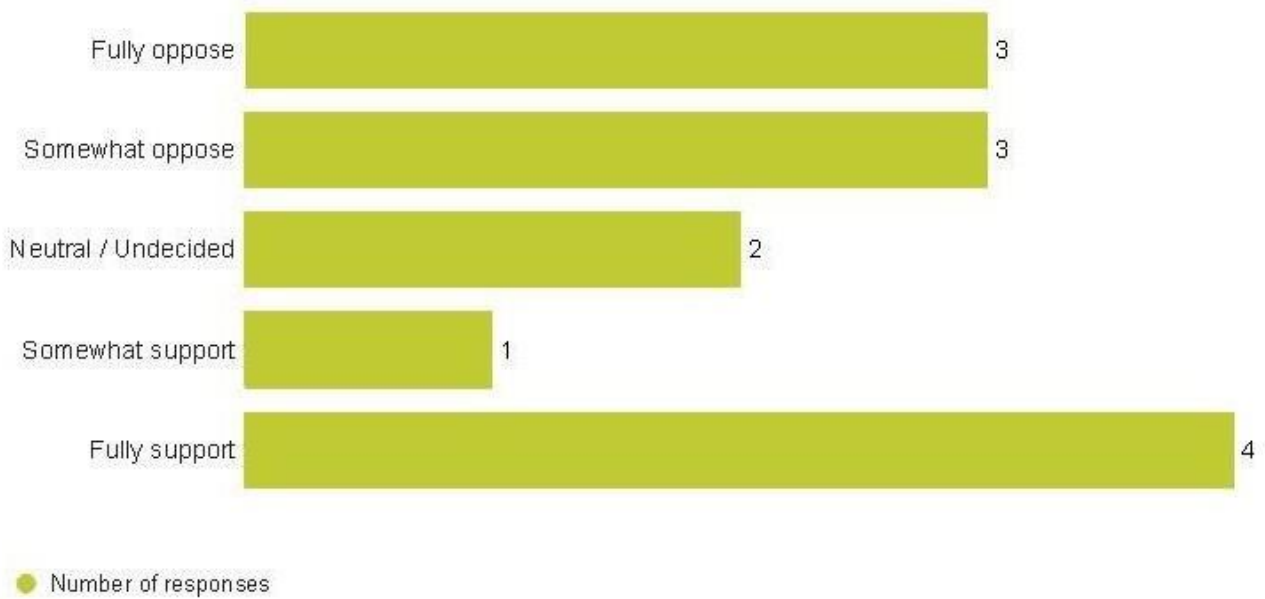
4a - How important or relevant is this issue to your organization (or to you personally if attending SGPC only in this capacity)?



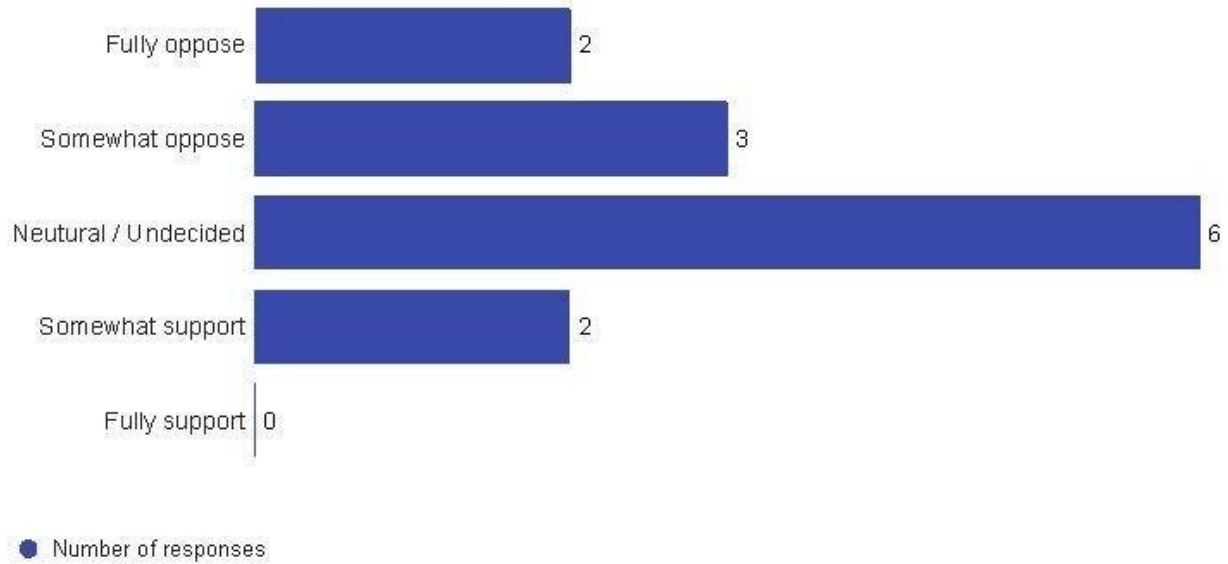
5a - To what extent to you oppose or support the FS' proposed plan?



6a - To what extent do you oppose or support CFC's proposed alternative plan?



7a - To what extent to you oppose or support the ZOA Subcommittee's recent plan?



8a - Which of these plans is your most preferred option?

