



SOUTH GIFFORD PINCHOT  
**COLLABORATIVE**

*working together for the greater good*

# Zones of Agreement

## Plantation Thinning Gifford Pinchot National Forest South Zone Planning Area

Approved December 12, 2018

The South Gifford Pinchot Collaborative (SGPC) is a community-based partnership that participates in the development, facilitation, and implementation of projects that enhance forest ecosystem health, economic vitality, recreation, and public safety on the south end of the Gifford Pinchot National Forest and in surrounding communities.

SouthGPC.org

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## 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)<sup>1</sup> that served as a model and inspiration for this work. Mark Webb, BMFP Executive Director, shared valuable insights and lessons learned that contributed to the success of this project. The collaborative also thanks our Forest Service partners, Erin Black, Bengt Coffin, Jon Nakae, and Emily Platt, for their willingness to participate in subcommittee meetings, share information, and offer feedback on what is most helpful from their perspective.

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<sup>1</sup>Blue Mountains Forest Partners. Zones of Agreement (ZOA).  
<http://www.bluemountainsforestpartners.org/work/zones-of-agreement/>

This document was developed by the SGPC Zones of Agreement subcommittee: Jacob Anderson, Jon Paul Anderson, Nicole Budine, Jeremy Grose, and John Moody, with support from Lisa Naas Cook, SGPC Coordinator, and Ethan Lockwood, SGPC Resource Assistant. The collaborative approved the document in sections: Road Access to Plantations (4/19/18), Riparian Reserve Management in Plantations (9/20/18), Plantation Thinning (10/18/18), and background material included as appendices (12/12/18).

## About the 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 newly-developed Stewardship Sale authority could improve forest health and provide economic benefits to local communities on the southern end of the Gifford Pinchot National Forest (GPNF). Recognizing that they were often working on similar issues with shared members, the two groups combined to form the South Gifford Pinchot Collaborative in December 2011.

The SGPC is a community-based partnership that participates in the development, facilitation, and implementation of projects that enhance forest ecosystem health, economic vitality, recreation, and public safety on the south end of GPNF and in surrounding communities. Collaborative members include conservation and environmental organizations, recreation groups, small-scale forest contractors, large timber companies, retired Forest Service employees, and individual community members. The SGPC works closely with the 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<sup>2</sup> 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. 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.

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<sup>2</sup> Stewardship Contracting and Retained Receipts, Gifford Pinchot National Forest.  
<https://www.fs.usda.gov/detail/giffordpinchot/landmanagement/resourcemanagement/?cid=fseprd498236>





SGPC Annual Meeting in Stevenson, WA, March 2018



Wind River Field Trip, August 2017

## Document Purpose

The purpose of this Zones of Agreement document is to provide the Forest Service with a record of the collaborative's current areas of agreement on plantation thinning within the GPNF South Zone planning unit. In particular, it highlights the group's rationale and recommendations for plantation thinning, riparian reserve management within plantations, and road access to plantations. The FS may use these agreements as sideboards when considering project

locations and treatments within a planning area. When project-specific management concerns arise that are not addressed here, the FS may seek additional input from the collaborative. The SGPC recognizes that the FS retains full decision-making authority and discretion to follow or deviate from the ZOA for Plantation Thinning.

In support of the overarching goal to increase the pace and scale of restoration on the southern 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: Plantation Thinning

## Synthesis of Agreement

SGPC supports thinning in plantations (35-80 years old) for these reasons:

- Improving stand resiliency (e.g., disease, insect, and fire) and species heterogeneity.
- Increasing viable plant and wildlife habitat.
- Bringing conifer plantations more closely into alignment with natural stand composition, functionality, and dynamics.
- Increasing growth and yield in plantations on Matrix designated land.
- Increasing growth and resiliency in plantations on Late Successional Reserve (LSR) designated land.
- Providing economic opportunity for local communities through ecologically and economically viable timber sales.

SGPC supports the following management actions in plantations:

- **Thinning in Matrix Plantations without Critical Habitat Overlay<sup>3</sup>**

Where the management objective is multiple use with an emphasis on timber production, implement silvicultural prescriptions that produce sustainable forest recovery and facilitate growth and yield over the long term.

We support the increased use of Designation by Prescription (DxP)<sup>4</sup> because this method provides a varied prescription that allows the healthiest, tallest, and most vigorous trees to be left across the cutting unit. DxP specifies what the end result should look like on the ground and must include specific information that allows all parties to arrive at a similar result. Designation by Description (DxD)<sup>5</sup> does not allow for variations in tree spacing and selection since the spacing is fixed and leaves the largest tree regardless of species or health.

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<sup>3</sup> “Critical habitat is a term defined and used in the Endangered Species Act. It is specific geographic areas that contain features essential to the conservation of an endangered or threatened species and that may require special management and protection. Critical habitat may also include areas that are not currently occupied by the species but will be needed for its recovery.” Source: US Fish and Wildlife Service, “Listing and Critical Habitat,” <https://www.fws.gov/endangered/what-we-do/critical-habitats-faq.html>.

<sup>4</sup> Designation by Prescription (DxP): “A method of designating trees for removal by describing the desired end result of the treatment; for example, retain 60 percent basal area. Designation by prescription may be used for noncommercial material or for commercial material when, for payment purposes, the quantity of products removed is determined post harvest.”

<sup>5</sup> Designation by Description (DxD): “A method of designating trees for removal, without marking individual trees, by describing the trees to be removed based on characteristics that can be verified after removal; for example, lodgepole pine less than a specified stump diameter. Designation by description may be used for commercial or noncommercial material.” Source for DxP and DxD definitions: Forest Service Handbook 2409.19, Renewable Resources, Chapter 60, Stewardship Contracting: [https://www.fs.usda.gov/Internet/FSE\\_DOCUMENTS/stelprdb5392208.pdf](https://www.fs.usda.gov/Internet/FSE_DOCUMENTS/stelprdb5392208.pdf).

We encourage the retention of legacy trees and down wood.

- **Variable Density Thinning in LSR Plantations and Matrix Plantations with Critical Habitat Overlay**

We encourage variable density thinning to put plantation stands on a trajectory to more closely resemble the natural stands of a healthy and resilient forest.

We support the retention of legacy trees and downed wood, as well as the use of skips, quarter- to half-acre gaps, and clumping when possible.

- **Wildlife Forage Seeding**

We encourage that closed roads, and in some cases created openings or exposed soil areas, be managed to support biodiversity and reduce edge effects on existing and potential wildlife habitat. For example, the Forest Service should consider wildlife forage seeding, and planting when possible, in lieu of heavy slash covering to support ungulate mobility and benefits to other early seral wildlife species.

- **Operating Season**

The collaborative recommends that the Forest Service use a condition-based threshold, rather than hard dates, for plantation thinning projects. In particular, the Forest Service should consider fall and winter 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).

- **Invasive Weeds**

We encourage the incorporation of invasive species mitigation measures in timber sale administration plans in order to reduce the spread of invasive plants during and following timber harvest activities.

- **Firewood and Biomass**

The Forest Service should 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.

# ZOA: Riparian Reserve Management in Plantations

## Synthesis of Agreement

### Overview

The Collaborative agrees that riparian and aquatic components of the forest landscape are essential for maintaining and restoring biodiversity and natural ecosystem functions. Additionally, we recognize that connectivity between habitats is a critical component for maintaining a diverse, healthy, and functional forest ecosystem.

Past management activities (e.g., road construction, clearcut logging, conifer replanting, and fire suppression) have altered natural germination, regeneration, and disturbance processes in some areas of the forest. Unnaturally dense stands with reduced structural and species diversity are often the result. We acknowledge that it may be necessary and beneficial to treat riparian areas within plantation stands in the short term in order to restore forest ecosystem health over the long term. Such treatments may involve terrestrial, riparian, and aquatic habitats and should be guided by the need to maintain and restore forest permeability, heterogeneity, complexity, and functionality.

This section focuses on activities within Riparian Reserves, a land management allocation identified in the Aquatic Conservation Strategy (ACS) from the Northwest Forest Plan (NWFP). Riparian Reserves are portions of watersheds where riparian-dependent resources receive primary emphasis. The ACS outlines nine objectives that must be considered when evaluating projects and defines reserve widths for five categories of streams or water bodies. Commercial timber harvest within Riparian Reserves can only be a byproduct of management actions required to control stocking, reestablish and manage stands, and acquire desired vegetation characteristics needed to attain ACS objectives (see Appendix B for details).

While the ACS determines the footprint of Riparian Reserves and management objectives, it does not specify what actions may occur within the reserve or the no-cut buffer distances for particular aquatic features. Given the scale of current thinning projects, the Mt. Adams Ranger District determined that is not viable to develop case-by-case thinning prescriptions for each Riparian Reserve.

Therefore, the District created a Riparian Management Strategy for Thinning Projects to document their logic track and science-based approach to prescribing silvicultural treatments in Riparian Reserves. The Strategy describes an inner no-cut (no commercial harvest) buffer for each Riparian Reserve stream or waterbody category to be used where field data is nonspecific



or does not indicate specific areas of concern. The collaborative recognizes that the Forest Service has discretion on how no-cut buffers are applied to a particular planning area.

We intend that the recommendations described below be considered along with the Strategy when developing prescriptions for Riparian Reserves.

## SGPC Recommendations for Riparian Reserve Management in Plantations

In addition to supporting NWFP ACS objectives, activities in Riparian Reserves should seek to maintain and restore biodiversity and ecosystem functions through landscape-level connections of riparian and upland areas.

- Vary inner no-cut Riparian Reserve buffer widths to capture unique landscape features such as snags, downed wood, hardwood pockets, stream-adjacent seeps, and unstable slopes.
- Utilize a variety of management options (e.g., skips, gaps, and variable density thinning) to support landscape connectivity. For example, consider the use of leave patches adjacent to inner no-cut Riparian Reserve buffers.
- Consider creating fuel breaks in fire-prone stands to reduce overstocking near stream edges and to develop larger and more resilient trees.
- Manage for threatened, endangered, proposed, and listed (TEPL) species with specific habitat management activities where appropriate. For example, provide for amphibian connectivity across thinned stands and ridgelines or protect microclimate for shade dependent plant species such as *Corydalis*.
- Provide both the science-based rationale and forest management objective for increasing or decreasing buffers from the minimums set in the default table. When custom buffers are used, provide the percent of proposed treatment area affected.
- Consider management options to create heterogeneity within the inner no-cut Riparian Reserve buffer (e.g. drop and leave trees).
- To promote heterogeneity and reduce edge effects in heavily thinned units, use a feathered thinning approach (e.g. transition from thinned unit to inner no-cut Riparian Reserve with standard to light thinning of the outer Riparian Reserve).

# ZOA: Road Access to Plantations

## Synthesis of Agreement

To meet the goals for plantation thinning projects described earlier, the collaborative recommends the following prioritized road access options to maintain forest and aquatic ecosystem health and provide for economically viable timber sales.

## Road Access Prioritization

We recognize the challenges that the Forest Service faces in maintaining a safe, environmentally sound, affordable, and efficient road system that is responsive to public needs and considers future management activities. The collaborative also understands that the road maintenance backlog and declining appropriated funding require the Forest Service to carefully consider management actions that involve system roads. When considering road access to plantations, we acknowledge these challenges and support the overall goal of not increasing net system road mileage. However, we recognize that there may be circumstances when, in order to reduce ecological impacts, modifying an existing road is appropriate and will result in a net increase in system road mileage. For example, to address sedimentation and road maintenance concerns caused by a short, steep road segment with a stream crossing, it may be appropriate to replace this section with a longer, more gradual road segment that has less overall ecological impact.

### **1. Open System Roads (Level 2)**

The Forest Service should prioritize use of open system roads above the following access options for plantation thinning projects.

### **2. Closed System Roads (Level 1)**

If open system roads are unavailable on a given project, the Forest Service should maximize use of closed system roads before building temporary roads unless a temporary road provides better ecosystem protection.

### **3. Temporary Roads**

When temporary roads offer the least ecologically impactful mode of access to a plantation, the Forest Service should both maximize the plantation area accessed and minimize stream crossings to protect forest and aquatic ecosystem health.

### **3.A: Locate temporary roads on previously disturbed areas (e.g. old temporary roads and skid trails).**

These disturbed areas should be prioritized for use as temporary roads over creation of new temporary roads whenever the aquatic risks associated with their use are less than those from new construction.

### **3.B: Using a Decommissioned Road Bed as a Temporary Road**

The SGPC recognizes that in some situations using a decommissioned road bed as a temporary road may be the most ecologically appropriate way to access a plantation. In these cases, it is understood that the roadbed will be returned to its prior decommissioned status upon completion of the thinning project.

The collaborative would like to be informed on a case-by-case basis of any proposed temporary roads on previously decommissioned road beds in a given planning area and consulted for feedback and concerns.

The collaborative recommends that the Forest Service consider these criteria when considering using a decommissioned road as a temporary road for a project:

- Number of aquatic crossings
- Economic cost of reopening
- Initial reason for decommissioning (recognize that most roads are decommissioned for aquatic restoration reasons)
- Restoration status (i.e., progress made and duration of recovery)
- Biodiversity impacts at varying scales (i.e., stand to watershed)
- Socio-economic impacts to local communities/Counties (e.g., potential impacts from increased, unauthorized use of the road such as search and rescue costs, waste concerns, fire risk, etc.)
- Existing and Potential Recreation Use
  - Current volume and types of recreation
  - Potential for road to create, or increase, recreation use and of what types
- Landscape Scale Planning Context
  - Future needs over the long term and at landscape scale
  - Benefit of thinning project within context of long-term, landscape-scale management objectives (i.e., ecological, economic, acres treated, etc.)
  - Project sequencing/timing (i.e., sequence projects to minimize need for using decommissioned roads as temp roads)

### **3.C: Build a New Temporary Road**

As a last option, build a new temporary road that maximizes the plantation area accessed, while minimizing ecological disturbance and aquatic impacts.

#### **User-Created Roads and Trails**

We recommend that the Forest Service identify user-created roads and trails in plantations and prioritize for closure those that are causing demonstrable harm to forest resources.

User-created roads and trails may include recently developed unauthorized routes as well as abandoned trails, decommissioned roads, or temporary roads that the Forest Service previously blocked or closed to public access.

#### **Improvements to System Roads Used on Sales**

We suggest that the Forest Service complete these improvements to system roads utilized in project sales: roads should be rocked, improve culverts if needed, complete ditching and brushing, and improve road signage.

## Appendix A: SGPC Project History

The SGPC has been involved with eight 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 Project Involvement

<b>Project</b>	<b>Date</b>
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-present



# Appendix B: Northwest Forest Plan and GPNF Plan Context

The collaborative's agreements are grounded in an understanding of the regulatory framework found in the Northwest Forest Plan, Gifford Pinchot National Forest Land and Resource Management Plan (Forest Plan), and in the functional definition of terms as used by the Forest Service.<sup>6</sup>

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<sup>6</sup> See Gifford Pinchot National Forest Planning page:  
<https://www.fs.usda.gov/main/giffordpinchot/landmanagement/planning>

# Forest Service Road Management Definitions

The Forest Service uses a complex set of nested road terminology to classify roads found on the Gifford Pinchot National Forest (GPNF).

System roads are inventoried, maintained, and managed by the Forest Service. Maintenance levels define the level of service provided by, and maintenance required for, a specific road, and range from the highest level of service (5) to the lowest level of service (1). The following System Road Maintenance Levels were identified from the National Forest Road System and Use report.<sup>7</sup> For visual representatives of the different road maintenance levels, see the [FS Guidelines for Road Maintenance Levels](#).<sup>8</sup>

## Maintenance Level 5:

Roads that provide a high degree of user comfort and convenience. Normally double lane, paved facilities, or aggregate surface with dust abatement. This is the highest standard of maintenance.

## Maintenance Level 4:

Roads that provide a moderate degree of user comfort and convenience at moderate speeds. Most are double lane, and aggregate surfaced. Some may be single lane. Some may be dust abated.

## Maintenance Level 3:

Roads open and maintained for travel by a prudent driver in a standard passenger car. User comfort and convenience are not considered priorities. Typically low speed, single lane with turnouts and native or aggregate surfacing.

## Maintenance Level 2:

Roads open for use by high-clearance vehicles. Passenger car traffic is discouraged. Traffic is minor administrative, permitted or dispersed recreation. Non traffic generated maintenance is minimal.

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<sup>7</sup> [National Forest Road System and Use](#), Compiled by Gerald Coghlan, Acting Director of Engineering, and Richard Sowa, Transportation Development Program Leader. 1/30/1998. Page 7.

<sup>8</sup> [Guidelines for Road Maintenance Levels](#), by Committee for Guidelines for Road Maintenance Levels. Leo Ruiz, Civil Engineer and Project Leader. December 2005.

## Maintenance Level 1:

These roads are closed. Some intermittent use may be authorized. When closed, they must be physically closed with barricades, berms, gates, or other closure devices. Closures must exceed one year. When open, it may be maintained at any other level. When closed to vehicular traffic, they may be suitable and used for nonmotorized uses, with custodial maintenance.

## Road Decommissioning

Activities that result in the stabilization and restoration of unneeded roads to a more natural state. (36 CFR 212.1).<sup>9</sup>

## Temporary Road

A road necessary for emergency operations or authorized by contract, permit, lease, or other written authorization that is not a forest road and that is not included in a forest transportation atlas. (36 CFR 212.1).<sup>10</sup>

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<sup>9</sup> FSM 7705–Transportation System.  
[www.fs.fed.us/t-d/programs/im/road\\_decomission/road\\_overview.shtml](http://www.fs.fed.us/t-d/programs/im/road_decomission/road_overview.shtml).

<sup>10</sup> [Blue Mountains Forests Revised Land and Resource Management Plan Glossary](#). March 2010. Page 52.

# Riparian Reserves, Aquatic Conservation Strategy, and the Northwest Forest Plan

The Aquatic Conservation Strategy (ACS), a component of the Northwest Forest Plan (NWFP), provides direction for maintaining and restoring the productivity and resilience of riparian and aquatic ecosystems on federal lands included under the NWFP. The ACS includes 4 elements: (1) Riparian Reserves, (2) Key Watersheds, (3) Watershed Analysis, and (4) Watershed Restoration. The 1994 Standards and Guidelines defined the following ACS objectives and Riparian Reserve widths.<sup>11</sup>

## Aquatic Conservation Strategy Objectives

The Aquatic Conservation Strategy (ACS) includes nine objectives that must be considered when evaluating projects that would occur in the Riparian Reserve, as well as a set of standards and guidelines that prohibit or regulate activities in Riparian Reserves that retard or prevent attainment of the ACS objectives.

1. Maintain and restore the distribution, diversity, and complexity of watershed and landscape scale features to ensure protection of the aquatic systems to which species, populations and communities are uniquely adapted.
2. Maintain and restore spatial and temporal connectivity within and between watersheds. Lateral, longitudinal, and drainage network connections include floodplains, wetlands, upslope areas, headwater tributaries, and intact refugia. These network connections must provide chemically and physically unobstructed routes to areas critical for fulfilling life history requirements of aquatic and riparian-dependent species.
3. Maintain and restore physical integrity of the aquatic system, including shorelines, banks, and bottom configurations.
4. Maintain and restore water quality necessary to support healthy riparian, aquatic, and wetland ecosystems. Water quality must remain within the range that maintains the biological, physical, and chemical integrity of the system and benefits survival, growth, reproduction, and migration of individuals composing aquatic and riparian communities.
5. Maintain and restore the sediment regime under which aquatic ecosystems evolved. Elements of the sediment regime include the timing, volume, rate, and character of sediment input, storage, and transport.
6. Maintain and restore in-stream flows sufficient to create and sustain riparian, aquatic, and wetland habitats and to retain patterns of sediment, nutrient, and wood routing. The timing, magnitude, duration, and spatial distribution of peak, high, and low flows must be protected.

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<sup>11</sup> “Aquatic Conservation Strategy Objectives” on page B-11 in Standards and Guidelines for Management of Habitat for Late-Successional and Old-Growth Forest Related Species Within the Range of the Northern Spotted Owl, Attachment A: <https://www.fs.fed.us/r6/reo/library/docs/NWFP-S&G-1994.pdf>.

7. Maintain and restore the timing, variability, and duration of floodplain inundation and water table elevation in meadows and wetlands.
8. Maintain and restore the species composition and structural diversity of plant communities in riparian areas and wetlands to provide adequate summer and winter thermal regulation, nutrient filtering, appropriate rates of surface erosion, bank erosion, and channel migration and to support amounts and distributions of coarse woody debris sufficient to sustain physical complexity and stability.
9. Maintain and restore habitat to support well-distributed populations of native plant, invertebrate, and vertebrate riparian-dependent species.

## Riparian Reserve Widths

Riparian Reserve widths are specified for five categories of streams or waterbodies as follows.

### Fish-bearing streams

Riparian Reserves consist of the stream and the area on each side of the stream extending from the edges of the active stream channel to the top of the inner gorge, or to the outer edges of the 100-year floodplain, or to the outer edges of riparian vegetation, or to a distance equal to the height of two site-potential trees, or 300 feet slope distance (600 feet total, including both sides of the stream channel), whichever is greatest.

### Permanently flowing non fish-bearing streams

Riparian Reserves consist of the stream and the area on each side of the stream extending from the edges of the active stream channel to the top of the inner gorge, or to the outer edges of the 100-year floodplain, or to the outer edges of riparian vegetation, or to a distance equal to the height of one site-potential tree, or 150 feet slope distance (300 feet total, including both sides of the stream channel), whichever is greatest.

### Constructed ponds and reservoirs, and wetlands greater than 1 acre

Riparian Reserves consist of the body of water or wetland and: the area to the outer edges of the riparian vegetation, or to the extent of seasonally saturated soil, or the extent of unstable and potentially unstable areas, or to a distance equal to the height of one site-potential tree, or 150 feet slope distance from the edge of the wetland greater than 1 acre or the maximum pool elevation of constructed ponds and reservoirs, whichever is greatest.

### Lakes and natural ponds

Riparian Reserves consist of the body of water and: the area to the outer edges of the riparian vegetation, or to the extent of seasonally saturated soil, or to the extent of unstable and potentially unstable areas, or to a distance equal to the height of two site-potential trees, or 300 feet slope distance, whichever is greatest.



## Seasonally flowing or intermittent streams, wetlands less than 1 acre, and unstable and potentially unstable areas

This category applies to features with high variability in size and site-specific characteristics. At a minimum, the Riparian Reserves must include:

- The extent of unstable and potentially unstable areas (including earthflows).
- The stream channel and extend to the top of the inner gorge.
- The stream channel or wetland and the area from the edges of the stream channel or wetland to the outer edges of the riparian vegetation.
- Extension from the edges of the stream channel to a distance equal to the height of one site-potential tree, or 100 feet slope distance, whichever is greatest.

A site-potential tree height is the average maximum height of the tallest dominant trees (200 years or older) for a given site class.

Intermittent streams are defined as any nonpermanent flowing drainage feature having a definable channel and evidence of annual scour or deposition. This includes what are sometimes referred to as ephemeral streams if they meet these two physical criteria.

# 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 matrix land 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.

<b>Feature</b>	<b>No thin buffer (all thinning treatments)</b>	<b>Equipment Limitation Zone* (measured from outer edge of no thin buffer)</b>
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 USFS 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 USFS 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 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.

PLEASE NOTE, THE NEXT SEGMENT WAS TAKEN FROM RECENT AGREEMENT DURING THE BEAR CREEK SCOPING COMMENT DISCUSSIONS. I THINK THE PARAMETERS WILL BE CONSIDERED OK FOR SWIFT BUT AM UNSURE HOW DIFFERENT TERRAIN MAY AFFECT AGREEMENT BY ALL FOR SWIFT. WE WILL NEED TO DISCUSS.

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

<b>Feature</b>	<b>No thin buffer (all thinning treatments)</b>	<b>Equipment Limitation Zone* (measured from outer edge of no thin buffer)</b>
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 USFS 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 USFS 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 system roads 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 17<sup>th</sup> 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

# 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  
FSM - Forest Service Manual  
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  
USFS - United States Forest Service  
ZOA - Zones of Agreement