

Appendix A: Gotchen LSR Thinning Comments and Forest Service Responses

The Gotchen LSR Thinning proposal was issued for a formal 30-day comment period beginning November 21, 2006. Substantive comments were received from:

Joint letter – Conservation NW, Susan Jane Brown, and Gifford Pinchot Task Force – CNW/GPTF

Following is a summary of the comments and Forest Service Responses.

	Comment	Forest Service Response
CNW/GPTF	<i>Stewardship projects should be conducted in an open, inclusive, and transparent process. The GP Task Force and ConservationNW, as relevant stakeholders, were not involved in a collaborative manner in the development of this project.</i>	The stewardship project was proposed by the public sector through the Title II program within Skamania County. The Skamania County Resource Advisory Committee, a collaborative group, made up of industry, agency, and public individuals selected this project for FY 07 Title II funding. Since then, a group of stakeholders (Gifford Pinchot Task Force, Susan Jane Brown, and Conservation NW), who have been working to achieve the twin goals of restoring watershed health while providing quality local employment, have

		been involved and making project design recommendations.
CNW/GPTF	<i>The Gotchen Risk Reduction and Restoration Project, which is in close proximity to this project and which the GP Task Force was involved in designing, included a 10 inch diameter limit for grand fir trees in the LSR. This new project includes no such diameter limit and no clear explanation has been given as to why a diameter limit has been abandoned.</i>	The Gotchen Risk Reduction and Restoration Project EIS (2/04) restricts green tree cutting to a 10.9” diameter limit in most LSR stands proposed for understory thinning. We modified this project to include a 20.9” green tree diameter cut limit since the Gotchen LSR Thinning unit is adjacent to another LSR unit (EIS) which allowed a 20.9” green tree diameter cut limit.
CNW/GPTF	<i>We are dismayed that the Forest Service is proposing to construct 600 feet of road to treat only 47 acres of forest while failing to propose any road decommissioning as part of the project.</i>	We have modified the original proposal to construct approximately 250 feet of temporary road and added a stewardship project to help decommission a road in the East Fork of the Lewis River Drainage.
CNW/GPTF	<i>Since the Forest Service intends to place skips in the stand, we recommend that at least some of the skips be located to protect the largest and</i>	Agree

	<i>most intact legacy features in the stand.</i>	
CNW/GPTF	Moreover, hazard tree removal is not an accepted use of stewardship retained receipts. Under “Appropriate Use of Stewardship Contracting” in the Renewable Resources Handbook, examples are given of appropriate stewardship contracting activities (Exhibit 02) and nowhere is there mention of hazard tree removal or anything suggesting that hazard tree removal is an appropriate use of stewardship contracting. All stewardship contracting projects must be restoration projects, and hazard tree removal is by no means restoration.	We have removed the hazard tree removal stewardship project from this project.
CNW/GPTF	<i>The Forest Service proposes to treat grand fir stumps 12 inches diameter or greater with a coating of granular sodium tetraborate decahydrate or disodium octaborate tetrahydrate to deter the spread of annosus root rot. If a diameter limit is applied to the project, there will be no need for the use of toxins because stumps less than 18 inches in diameter are rarely infected</i>	We disagree. Since grand fir will be a component of this LSR stand in the future, we need to and save these trees and try to deter the disease. The disease spreads underground by root to root contact and long distance, above ground when airborne sporidia, produced from the disease conks, disperse and infect freshly-exposed stump “cut” surfaces. Sporidia on freshly “cut” stump surfaces germinate and initiate new

		<p>infections. The Pacific Northwest Region Insect and Disease Management Policy recommends this treatment for stumps surfaces 12" in diameter and greater.</p>
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