Attachment to Appendix J:

Comments from Federal, State, and Local Governmental Agencies, Political Representatives, and Tribes

Note: Comments were received from USDA Forest Sciences Laboratory (Susan Hummel). They were summarized in the Appendix J: Summary of Public Comments and Responses however they were delivered as notations within a copy of the DEIS and therefore are not reproduced for this attachment.

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10
1200 Sixth Avenue
Seattle, Washington 98101

Reply To
Attn Of: ECO-088

NOV 0 4 2003

Ref: 01-075-AFS

Julie Knutson, Gotchen EIS Team Leader
Gifford Pinchot National Forest
Mt. Adams Ranger District
2455 Highway 141
Trout Lake, WA 99650

Dear Ms. Henchell:

The U.S. Environmental Protection Agency (EPA) has reviewed the Draft Supplemental Environmental Impact Statement (DEIS) for the proposed **Gotchen Risk Reduction and Restoration Project** (CEQ # 030335) pursuant to our responsibilities under Section 309 of the Clean Air Act and the National Environmental Policy Act (NEPA) as amended. Section 309, independent of NEPA, directs EPA to review and comment in writing on the environmental impacts associated with all major federal actions. The Gotchen Planning Area covers approximately 19,700 acres within the Gifford Pinchot National Forest of south central Washington.

We have found this EIS to be well written and formatted. We support the intention and direction that the Forest Service is pursuing to reduce the risk of losing late-successional function and resiliency and acknowledge that large, high-intensity fires could impair the resources from meeting Late-Successional Reserve (LSR) objectives. Also, we support certain prescriptive elements to achieve the Purpose and Need of the Action Alternatives, including creation of fuel breaks, promotion of underburning, initiating road closure and decommissioning, maintaining overstory canopy near current levels, and limiting size of harvestable trees.

Currently, the DEIS presents four alternatives. There are three Action Alternatives, Alternative B, C, and D. Alternative B is the Proposed Action Alternative with special emphasis given to establishing shaded fuelbreaks. Alternative C has a main emphasis to reduce fire risk and improve late-successional function and resiliency. Alternative D emphasizes treatment of ground and ladder fuels to minimize the spread of wildfires. For baseline purposes, the DEIS proposed the No Action Alternative (Alternative A) which retains the current management approach.

Based upon proposed Alternatives, we have assigned the Draft EIS a rating of EC-2 (Environmental Concerns - Insufficient Information). EPA continues to have environmental

concerns regarding proposed silvicultural practices in Late-Successional Reserves and designated critical habitat, endangered species, antidegradation, and grazing management activities. The rating and a summary of our comments will be published in the *Federal Register*.

I encourage you to contact Tom Connor at (206) 553-4423 if you would like to discuss our comments and how they might best be addressed. Thank you for the opportunity to review this DEIS on the Gotchen Risk Reduction and Restoration Project in Washington State.

Sincerely,

Judith Leckrone Lee, Manager
Geographic Unit

Enclosures

U.S. Environmental Protection Agency's Detailed Comments on Gothchen Risk Reduction and Restoration Project Draft Environmental Impact Statement (DEIS)

Silvicultural Practices in Late-Successional Reserves

Forest Fragmentation

The DEIS states that the function and resiliency of the forests within the project area are at risk due to previous management decisions which have suppressed natural disturbance regimes and fostered silvicultural prescriptions which have increased forest fragmentation. While we support management of fuel ladder potential within the project area, this management direction should not come at the expense of forest connectivity or interior forest resiliency. We recommend that the FEIS discuss how the Action Alternatives would prevent forest fragmentation or reduce stands of interior forest habitats in the project area.

Ladder Fuel Management

The FEIS should also disclose which harvest size would best support beneficial habitat for spotted owls and forest function. This is in recognition that Action Alternatives C and D would limit harvest size to 10" dbh (diameter breast height), whereas Alternative B would harvest trees to 20" dbh. We recommend that the FEIS provide a silvicultural definition of ladder fuels, especially within Late- Successional Reserves (LSRs).

Forest Roads

Forest roads are another major contributing factor to forest fragmentation. In general, we support road closure and decommissioning as a primary means of reducing habitat fragmentation. Therefore, we were pleased to see that all proposed Action Alternatives include approximately 25 miles of road closure and decommissioning. We support the Alternatives which initiate the lowest level of temporary road construction or reconstruction. Also, we support Alternative D since it proposes the least amount of temporary road development. However, the FEIS should discuss if current road density is affecting interior forest conditions; and if proposed road closure and decommissioning levels within the Action Alternatives are enough to reduce edge habitats which undermine habitat connectivity and interior forests.

Endangered Species Act (ESA) - Threatened and Candidate Species

Northern Spotted Owl

The FEIS should provide a discussion of US Fish and Wildlife Service's (USFWS) Biological Opinion (BO) for the northern spotted owls within the planning area and how each Alternative works within the framework of the (BO) to maintain and restore the listed species and its habitat.

Our concern is that population resiliency of this listed species has been markedly affected by a large scale alteration of its preferred habitat in Washington State. According to the U.S. Forest Service's Pacific Northwest Research Station, owl populations have markedly declined more in the State of Washington than in the other two Pacific coast states (Oregon and California) which comprise its natural range in the United States. Since the reasons for

population decline within Washington State remains unclear, we recommend that the FEIS disclose current knowledge of owl population dynamics based on the latest information from the Pacific Northwest Research Station. We recommend developing an active monitoring program which could result in potential silvicultural prescription adjustments. This monitoring strategy should be developed as part of the project-development process and included in the EIS. Also, since USFWS's effect determination is not clearly stated in the DEIS, we recommend that the FEIS should clearly disclose USFWS's conclusions of proposed actions within the project area.

Mardon Skipper

The FEIS should more adequately disclose how the Forest Service can improve restoration of open grassland habitats and associated complexes throughout the project area for the mardon skipper, a candidate species under ESA.

The DEIS notes that the Gotchen Creek watershed is a key site for conservation of this butterfly species. Unfortunately, this habitat has declined due to conifer encroachment, invasive species and cattle grazing. Current management actions may be inadequate for the conservation of this federal candidate species. The DEIS states that invasive species are severely degrading suitable skipper habitat, that on-going grazing activities may be impacting aspen and meadow habitat restoration, and that current water storage activities are a problem. With only 5% of the original prairie grasslands remaining (according to Washington Department of Fish and Wildlife), conservation of remaining suitable habitat seems essential for the preservation of this species.

In recognition of environmental needs of this candidate species, we recommend that the FEIS discuss how the Forest Service, in the project area, would improve:

< habitat connectivity between available or suitable habitats for the skipper,
< existing grazing management,
< invasive species management, and
< existing water storage practices.

Also, the FEIS should disclose any mitigation measures for this candidate species. The DEIS inaccurately states that mitigation measures are listed in Chapter 2 under Wildlife Mitigation (page 186). This portion of the document is omitted in the DEIS and should be included in the FEIS.

Clean Water Act - Antidegradation

The FEIS should discuss more clearly the quality of water in the Gotchen Planning area and how the FS will prevent degradation of unimpaired aquatic resources within the project area.

While the DEIS states all streams meet state water temperature standards within the project area, the document is not clear if other parameters, like fecal coliform or turbidity, meet or exceed state standards. In addition, where project area resources meets state water quality standards the FEIS should disclose how the FS will protect these resources from degradation.

Received 9/2/03

United States Department of the Interior

OFFICE OF THE SECRETARY
Office of Environmental Policy and Compliance
500 NE Multnomah Street, Suite 356
Portland, Oregon 97232-2036

IN REPLY REFER TO:

ER03/625

August 29, 2003

Cynthia Henchell
Zone Team Leader
2455 Highway 141
Trout Lake, Washington 98650

Re: COMMENTS – Draft Environment Impact Statement for Gotchen Risk Reduction and Restoration Project, Gifford Pinchot National Forest, Skamania and Yakima Counties, Washington

Dear Ms. Henchell:

The Department of the Interior (Department) has reviewed the Draft Environment Impact Statement (DEIS) for Gotchen Risk Reduction and Restoration Project, Gifford Pinchot National Forest, Skamania and Yakima Counties, Washington. The Department, through the U.S. Fish and Wildlife Service (Service), has been an active member of the interdisiplinary team for this DEIS, and this involvement has facilitated the needs of the Service being addressed as an integral part of the Forest Service's proposed action. The Department appreciates the opportunity to be involved in this process, and the following are additional comments for your consideration in the development of the Final Environmental Impact Statement (FEIS) for this project.

Page 136, Chapter 3 Affected Environment, Section Hydrology, Subsection Precipitation, figure 3-3:

The Department recommends showing the locations of the two streamflow-gaging stations on the White Salmon River on a map figure and checking the dates that the peak passed each of the two stations; the travel time may delay arrival of the peak at the second station, making it more appropriate to compare peaks from the same storm than flow on the same day. The Department also recommends that the data shown in figure 3-3 be shown on a basin-yield basis, i.e., cubic feet per second per square mile. A comparison of basin yields would indicate significant differences in runoff characteristics between the subbasins.

Page 137, Chapter 3 Affected Environment, Section Hydrology, Subsection Precipitation, first paragraph, last sentence:

The document states that water delivered to the surface does not reach the main stream White Salmon River directly through surface channels and that the fate of precipitation remains unknown. Some potential losses of precipitation could be evaporation and infiltration to ground water. The Department suggests that the document include a section discussing these portions of the hydrologic cycle and the potential impacts of the proposed action on ground water.

Page 138, Chapter 3 Affected Environment, Section Hydrology, Subsection Climate, second paragraph:

The document states that air temperatures are measured at Mt. Adams station, 3 miles from the project boundary. Page 135 states that precipitation is measured at the Mt. Adams station less than 2 miles from the boundary. The Department suggests reconciling these two statements with regard to the location of the Mt. Adams station.

Page 139, Chapter 3 Affected Environment, Section Hydrology, Subsection Hydrology:

The Department recommends clarifying the Hydrology Section of the report through reorganization, thereby enabling the reader to better follow the flow and logic of the information being presented. In this section, peak flows were first addressed in the Precipitation Subsection, then reintroduced in the Subsection on Hydrology, and water quality is discussed in the Subsection on Beneficial Uses and Key Water Quality Parameters and again in the Subsection on Water Quality. One possible reorganization format for subsections in the Hydrology Section might be: Climate and Precipitation (sources of water in the basin); Surface Water Flows; Surface Water Quality; Beneficial Uses (and if appropriate, other information about the ultimate fate of water, whether infiltration to ground water, evapotranspiration, or discharge out of the study area).

Page 140, Chapter 3 Affected Environment, Section Hydrology, Subsection Hydrology, first full paragraph:

The fact that water is diverted from Gotchen Creek and a tributary is central to the discussion on page 136, first full paragraph, and may in part explain why the creek is observed to be dry before the confluence with White Salmon River. The Department recommends developing a water budget for the area and measuring infiltration, or identifying an alternate mechanism for ensuring that infiltration is a dominant process, as reported. The document states that the amount and fate of water draining through subsurface pathways is unknown. If possible, this information should be estimated. If the proposed action could decrease infiltration capacity of soils, or evapotranspiration, for example, flooding could result.

Page 254, Chapter 4 Environmental Consequences, Section Hydrology, first full paragraph, last sentence:

The document states that areas with decreased canopy cover are expected to generate more water for runoff. The Department recommends that the document describe how it was determined that this water would run off and not infiltrate. The influence of soil change (for example, creation of hydrophobic condition) on runoff as a result of severe fires should also be addressed.

If you have any questions regarding these comments, please contact Mr. Celso Puente, U.S. Geological Survey Eastern Region and Headquarters Office, 423 National Center, Reston, Virginia, 20192, (703) 648-5601.

We appreciate the opportunity to comment.

Sincerely,

Preston A. Sleeger
Regional Environmental Officer

Received 9/2/03

United States Department of the Interior

OFFICE OF THE SECRETARY
Office of Environmental Policy and Compliance
500 NE Multnomah Street, Suite 356
Portland, Oregon 97232-2036

IN REPLY REFER TO:

ER03/625

August 29, 2003

Cynthia Henchell
Zone Team Leader
2455 Highway 141
Trout Lake, Washington 98650

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The document states that areas with decreased canopy cover are expected to generate more water for runoff. The Department recommends that the document describe how it was determined that this water would run off and not infiltrate. The influence of soil change (for example, creation of hydrophobic condition) on runoff as a result of severe fires should also be addressed.

If you have any questions regarding these comments, please contact Mr. Celso Puente, U.S. Geological Survey Eastern Region and Headquarters Office, 423 National Center, Reston, Virginia, 20192, (703) 648-5601.

We appreciate the opportunity to comment.

Sincerely,

Preston A. Sleeger
Regional Environmental Officer

STATE OF WASHINGTON
DEPARTMENT OF FISH AND WILDLIFE
2108 Grand Blvd. • Vancouver WA 98661 • (360) 696-6211 • Fax (360) 906-6776/6777

August 15, 2003

Cynthia Kenchall
Zone Team Leader
Mt. Adams Ranger District
USDA Forest Service
2455 Hwy. 141
Trout Lake, WA 98650

Dear Ms. Kenchall:

Re: Gotchen Risk Reduction Draft Environmental Impact Statement, May, 2003

Washington Department of Fish & Wildlife staff (WDFW) have reviewed the Gotchen plan and we offer the following comments for your consideration:

General Comments
We had expected our formal comments and recommendations from our March 25, 2002 letter would be incorporated into the Draft EIS, however, it appears that the DEIS plan is essentially the same as the Scoping Letter. Therefore, we will reiterate our comments, while addressing other issues covered in the DEIS.

We believe that the various fuel reduction measures are more appropriate within the Matrix area then within the Late Successional Reserve (LSR). Some of the proposed actions in the LSR are likely to adversely affect northern spotted owls, goshawks, marten and other late-seral species of concern.

1. Range of Alternatives
We again ask for an alternative that does not propose timber harvest within the LSR. Due to its special designation in the President's Forest Plan, the Forest Service should consider an option where prescribed burns and/or thinning from below are the primary risk reduction treatments in the LSR rather than allowing for the harvest of mature trees.

One of the problems with the DEIS is the difficulty of discerning major differences between the alternatives (except for the no-action alternative). It is our understanding that NEPA requires a range of dissimilar alternatives.

The material presented in Table 4.14 on page 191, illustrates this point. This graphic compares various treatments: Alternative B will treat 9 percent of the planning area;

Alternative C will affect 11 percent, while Alternative D will treat 8 percent. The difference between these treatments is barely detectable

2. Stand Prescriptions
A major challenge facing forest managers in the eastern Cascade Mountains is reducing the possibility of a stand-replacing fire while still retaining late-seral forest conditions. Nearly 100 years of management activities have exacerbated fuel buildup on many public lands.

"Management practices that have had the most significant effects on fire regimes in eastside forests are fire suppression, livestock grazing, and selective tree harvest." 1

Apparently, 20-25 year fire intervals were common in the Gotchen area. As the Gotchen Plan states, "Recent timber thinning along Roads 80 and 82 along with the East Timber Sale (1998) has effectively created shaded fuel breaks along those roads. Timber harvest on adjacent private (and tribal lands) have further reduced the threat of large stand replacing fire in this area."

The risk reduction plan calls for treating or harvesting from Alternative B 1,139 LSR acres to Alternative D 2,467 LSR acres. Implementing either of these alternatives will prevent selected plantations within the LSR from growing into late successional stands, and will successionally set back existing spotted owl habitat. The President's Forest Plan allows timber harvest in LSR's, but only tight restrictions. Normally these harvests can only promote old-growth features. Since results are mixed regarding retention of high quality spotted owl habitat in post-timber harvest stands, we recommend the following mitigative measures:

1. Experiment with varied timber harvest prescriptions in the Matrix area to determine if the proposed thinning objectives are achievable and how they will impact spotted owl habitat, snags and fire behavior, while only harvesting small diameter trees (less than 10" dbh) within the LSR. This constitutes a "thinning from below" prescription (as planned for areas AA and BB);

2. Mitigate any converted LSR habitat outside of spotted owl 0.7 mile circles by placing high quality Matrix acreage into the LSR designation.

3. Purpose and Need for Action
The DEIS states that the proposed actions are necessary to address significant forest health concerns, including insects and fire risk, however, any contribution toward these objectives from the treatments proposed is likely to be small. In contrast, impacts to the LSR and species that inhabit late-seral forests are likely to be significant. An experimental harvest prescription in a LSR could have adverse negative impacts to a federally threatened species whose numbers are declining.

4. Northern Spotted Owl

The narrative on page 20 states that there are "six known owl activity centers within the Gotchen Planning Area. Two were occupied as of the summer of 2002." What did the 2003 survey data reveal? Spotted owl demographic studies in eastern and western Washington are demonstrating a decline for this species, but reduced canopy cover cannot be singled out as the primary cause of decline. Competition from barred owls, along with extensive recent forest fragmentation on adjacent private, state and Yakama Nation lands, may be the main threats to spotted owls in the Gotchen area.

We expect that proposed timber harvests of suitable habitat within spotted owl site centers in both Matrix and LSR lands will favor barred owl expansion within the planning area. Barred owls already occupy a former spotted owl nest in the northwest portion of the risk reduction area, and researchers documented a third barred owl in 2001.

We believe that the treatments for stands M, and LSR shaded fuel breaks, N-Q, S-U and W will negatively affect spotted owl habitat. One activity center core is currently below the 0.7 mile 500-acre habitat threshold. In stand M, the treatment specifies timber harvest in an old growth stand located in close proximity to a site center to create a shaded fuel break. The harvest will reduce canopy cover from a preferred level (approximately 80%) down to around 60%, reducing nesting quality habitat.

The Mt. Adams Ranger District has conducted extensive surveys for spotted owls. However, these surveys have not covered all suitable habitat stands within the planning area. Proposed timber harvest within suitable habitat could destroy spotted owl nest sites, particularly in stand M. The proposed treatment of this stand would fragment one of the largest contiguous nesting quality stands remaining in the LSR.

We recommend the following:

1. No treatments in spotted owl habitat within 0.7 mile of any Gotchen spotted owl site center;

2. No timber harvest in stands M and BB;

3. Revise the prescriptions to better protect spotted owl habitat in the remaining units N through W (shaded fuel breaks) or drop those units altogether. They do not meet the biological justification required for LSR timber harvest;

4. No reduction of designated nesting, roosting, and foraging habitat.

5. Wildlife Reserve Trees (Snags)

On page 33, the DEIS states, "Snags and downed logs would be maintained at the minimum levels specified by the Northwest Forest Plan for shade fuel breaks in Matrix lands." The Forest Service should maintain more than the minimum amount of snags. Snags are important spotted owl nest sites and are used by over 100 forest species. Retaining the minimum "seven snags per acre," as planned in treatments H and I and N

through W, leaves little room for error. Firewood cutting, wind throw, and inadvertent felling during harvesting can quickly reduce seven snags per acre to three or four (or fewer) per acre. Actually, on page 61, the DEIS calls for retaining only "six snags per acre in Matrix units," below the Forest Service minimum.

We therefore recommend the following:

1. Retain all snags that are not a safety hazard and utilize snag modeling to determine the range of snag placement and numbers that result from implementing stand prescriptions and safety guidelines.

2. Emphasize retention of larger snags (>20" dbh). This important size class is uncommon within the landscape.

3. For those treatments such as plantation thinning occurring in the 12% of the Gotchen area containing "few or no snags," the Forest Service should endeavor both to create snags and retain all snags that currently exist.

We propose that "hazard trees" around the Gotchen Guard Station not be removed. By cutting off the top portion of the snag, the dead tree can still be utilized by wildlife while at the same time, not pose a safety concern.

6. Goshawk and Marten

The DEIS provides only cursory information on goshawk and marten management within the planning area. There is no narrative stating whether designated goshawk nest buffers will be entered as part of the risk reduction plan? Researchers have documented two goshawk nest sites and at least four marten locations in the planning area. Goshawks, spotted owls and northern flying squirrels use mistletoe clumps for nesting. As we mentioned in our previous letter, we request that the Forest Service retain dwarf mistletoe clumps in late successional Matrix stands designated as A through G.

Marten tend to avoid clearing, particularly roads. Expanding road openings as fuel breaks could be detrimental to marten in the planning area. This concern should be addressed in the final EIS. The EIS mentions that marten utilize slash piles for resting cover and den sites. WDFW recommends that some slash piles be retained on site to serve as marten habitat.

7. Mardon Skippers

WDFW appreciates the District's continuing efforts to survey for mardon skippers, protect their fescue meadow habitat, and avoid the use of Btk spray. We will continue to work cooperatively with the Forest Service to develop protective management prescriptions and avoid adverse impacts to this endangered butterfly. Within mardon skipper habitat, we recommend the following protective measures:

1. Prohibit all equipment not just "heavy equipment" as recommended in the DEIS.

2. Prohibit slash piling;

3. Minimize foot traffic;

4. Minimize soil (ground) disturbance as stated in the DEIS;

5. Conduct prescribed burns only in the autumn season;

6. Learn more about fescue distribution, and burn only small portions of mardon skipper habitat during any single year (fire is lethal to mardon skippers, which are year-round residents);

7. Directionally fell timber away from mardon skipper habitat.

8. Grazing

Cattle grazing played a key role in developing current forest conditions, and will affect prescribed fires, fuel types and levels, as well as reforestation. Furthermore, our personnel have observed adverse effects of cattle grazing on the mardon skipper meadows in the Gotchen landscape. We thus recommend the following actions:

1. Add livestock grazing as a principle issue in this analysis;

2. Install cattle-exclusion fencing at the landscape level, as part of the risk reduction project (we support the cattle-exclusion fencing proposed for Stand Z); and

2. Reassess prescribed burns in areas where cattle have eliminated much of the herbaceous understory, since these burns may increase the potential for a crown fire.

9. Larch Mountain Salamanders

Though lava bed/talus communities are mentioned in the DEIS , there is no reference to the presence of Larch Mountain salamanders, a State listed sensitive species.

10. Aspen

Aspen stands are a WDFW Priority Habitat. WDFW supports the plan to restore aspen woodlands as part of the risk reduction plan.

11. Oak Woodlands

The Oregon white oak is the only oak species native to Washington State. It is considered one of the most important trees for wildlife due to its acorn mast production and its tendency to produce multiple cavities, suitable for nesting and/or denning. WDFW supports the thinning of conifers in mixed oak-fir stands, where oak trees may be overtopped by conifers.

12. Road Management
We commend the plan to close more than 18.4 miles of forest roads via gate, and decommissioning 6.4 miles of "unnecessary roads."

13. White-headed Woodpecker
WDFW supports silvicultural prescriptions that promote mature stands of ponderosa pine. According to the PNW Lab in Wenatchee, old growth ponderosa pine has been reduced by 5/6 in the past 100 years. The white-headed woodpecker, on the WDFW Priority Species list, is a mature pine obligate species. WDFW has only identified 25 white-headed woodpecker nests in the entire state of Washington.

Thank you for your consideration.

Sincerely,

William Weiler
Habitat Biologist

1 Agee, James. K. 1994. fire and weather disturbance in terrestrial ecosystems of the eastern Cascades. Gen. Tech. Rep. PNW-GTR-320. Portland, OR. USDA. Forest Service, PNW Research Sta. 52. p.

Cc: WDFW staff
Mark Ostwald, USFW
Yakama Nation