

October 30, 2018

Yewah Lau
Hood Canal District Ranger
% Kim Crider
1835 Black Lake Blvd. SW
Olympia, WA 98512

Submitted electronically to: ylau@fs.fed.us

RE: Wynoochee Restoration and Roads Management Project Scoping Comments

Dear District Ranger Lau:

On behalf of the Olympic Forest Collaborative please accept these scoping comments on the Proposed Action for the Wynoochee Restoration and Roads Management Project.

The Olympic Forest Collaborative was launched on May 8, 2015 and brings together stakeholders from the environmental community, the timber industry, and representatives from federal and local government around shared goals of increasing timber harvest from the Olympic National Forest while benefitting the environmental quality of our forests and watersheds. The Collaborative works together and with federal officials to address issues that stand in the way of achieving the stated goals. Ultimately, the purpose is to show we can simultaneously enhance the forest ecosystem, provide for increased, sustainable timber harvests on the Olympic National Forest, and provide economic benefits to timber communities on the Peninsula.

Purpose and Need of the Project

The Olympic Forest Collaborative appreciates the stated purpose of the project which are consistent with the stated goals of the Collaborative, the Northwest Forest Plan and other applicable laws and regulations governing vegetation management and restoration activities on the Olympic National Forest. The stated purpose of the project includes (Scoping public cover letter 9/24/18):

1. Increase structural and habitat diversity and accelerate the development of late-successional forest characteristics by reducing the crowding of trees in second-growth stands in Late Successional Reserve and Adaptive Management Area land allocations
2. Improve Riparian Reserve conditions to meet Aquatic Conservation Strategy (ACS) objectives.
3. Contribute to the economic viability of local communities

We appreciate the attempt by the Forest Service to undertake a landscape level analysis that will address the condition and function of second growth stands within Late Successional Reserves (LSRs) as identified under the Northwest Forest Plan. Late Successional Reserves were identified for several reasons, one of them being the goal of establishing a network of late successional habitat across a broad landscape in reserves that included areas of previously harvested stands that existed in 1994.

The proposed thinning as part of this project focuses on accelerating development of late successional stand characteristics in second growth stands with a stand age of less than 80 years old within designated LSRs.

We understand that achieving restoration goals for National Forest LSRs within the Wynoochee watershed requires the use of timber sales as the enabling mechanism. Existing funding for such restoration activities are limited and the prospect of future funding is unclear. Trees removed in restoration thinning treatments have value. They can, and should, contribute to the local rural economy.

The Northwest Forest Plan includes a goal of providing a sustainable level of forest products for local and regional economies and to provide jobs. Comprised of both industry and conservation representatives, the Collaborative sees the proposed restoration thinning in previously harvested stands as an important opportunity that can and will benefit the overall forest, wildlife and local economies.

The proposed commercial thinning treatments are consistent with the types of thinning prescriptions that the Olympic Forest Collaborative supports and has been involved with. Overall, we feel that these treatments will increase the diversity, habitat value, and resilience of these stands and the overall landscape over time. There is a large body of research demonstrating the benefits of thinning in dense plantations (Anderson and Ronnenberg 2013). We look forward to working with the Forest to implement a portion of these projects.

Stewardship Contracting Opportunity

The Olympic Forest Collaborative was established, in part to support timber sales under Stewardship Contracting authority which allows associated timber receipts to stay local rather than go to the Treasury Department in Washington D.C. This powerful tool, if developed with a Collaborative, allows the Forest Service to trade “goods” (commercial timber) in return for services (work, including watershed restoration, road improvements or restoration and maintenance of wildlife and aquatic habitat either directly by the project, subsequently via the use of retained receipts, or both).

The Olympic Forest Collaborative is very interested in partnering with the Forest Service to utilize Stewardship Authority as part of this project to increase the amount of restoration work possible by providing additional and complementary funding through retained receipts. The Collaborative has already worked with the Olympic National Forest on several projects. They are Donkey Creek, WWB stewardship, GFF, H to Z stewardship and Big Creek stewardship. We are in the process of working with the Forest on two additional stewardship sales – Queets Corner and Humptulips. We encourage the Forest to utilize stewardship contracting as much as possible to implement the Wynoochee commercial thinning project.

Potential Stewardship Aquatic Restoration Projects

In anticipation of the opportunity for stewardship contracting as part of implementing the Wynoochee project, we would like to see the upcoming environmental assessment identify and

analyze high priority aquatic restoration projects in the Wynoochee watershed. We anticipate that Stewardship sales coming out of this project will generate retained receipts that will stay on the forest and be applied to aquatic restoration projects. These potential stewardship restoration projects need to be identified and analyzed through NEPA analysis before they can be included in stewardship contracts and implemented. The Forest should work with local restoration entities and its own specialists to identify and analyze potential high priority aquatic restoration projects as part of the environmental assessment.

Monitoring and Evaluation

The Olympic Collaborative is interested in understanding what types of monitoring and evaluation the Forest will be applying to these restoration projects. The Collaborative has recently received funding to develop a monitoring and evaluation protocol that it will apply to projects that it is involved with on the Olympic National Forest, which could contribute to, or build upon existing efforts.

In closing, the Olympic Forest Collaborative is interested in pursuing an opportunity to work with the Forest Service to incorporate stewardship contracting authority as part of the final Wynoochee watershed restoration project. The goals of this project align with that of the Olympic Collaborative. The project would use restoration forestry to accelerate late successional and old-growth characteristics consistent with Late Successional Reserve management under the Northwest Forest Plan. Effectiveness monitoring and adaptive management will be included in post sales prescriptions. In addition, local economic benefits and the opportunity for needed aquatic restoration associated with existing road impacts would be realized under the use of stewardship contracting authority.

Thank you for the opportunity to comment.

Sincerely,

Jon Owen
Conservation Co-Chair
Olympic Forestry Collaborative

Matt Comisky
Industry Co-Chair
Olympic Forestry Collaborative