July 1, 2020

Erin Uloth
Mt. Baker District Ranger
Mt. Baker-Snoqualmie National Forest
2930 Wetmore Ave., Suite 3A
Everett, WA 98201
Submitted electronically to erin.uloth@usda.gov

RE: North Fork Nooksack Vegetation Management Project Scoping Notice

District Ranger Uloth:

As members of the Darrington Collaborative, we are writing to provide comments on the North Fork Nooksack Vegetation Management Project scoping notice.

The Darrington Collaborative was launched on July 10, 2015 as a partnership between leaders from major conservation organizations, local STEM education programs and the community of Darrington. The goal of the group is to bring together a variety of interests, including those of the local timber industry and the conservation community, in order to increase ecologically sustainable timber harvests near Darrington and create jobs, while also improving and restoring the health of forests and watersheds in the area. The Collaborative is keenly focused on the Darrington area and the Darrington Ranger District but has engaged in projects throughout the Mt. Baker Snoqualmie National Forest.

The partnership grew out of the tragic Oso slide on March 22, 2014, which killed 43 people, destroyed homes, damaged public infrastructure including a main highway, and blocked the Stillaguamish River, causing significant environmental and economic damage. Conservation and recreation organizations worked with local community leaders to highlight and promote the incredible outdoor recreation opportunities near the scenic town of Darrington and support the establishment of local STEM education efforts that have evolved into the creation of the Glacier Peak Institute.

Purpose and Need of the Project

The Darrington Collaborative supports the stated purposes 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 Mt. Baker Snoqualmie National Forest. The stated purposes of the project include: (Scoping Notice 6/1/20)

- There is a need for more habitat that provides nesting and other habitat characteristics for marbled murrelet and northern spotted owls, in the form of "Late Successional Reserve." Thinning previously harvested areas is a way to facilitate and expedite creation of LSR.
- There is a need to improve the forest condition adjacent to bodies of water, known as "Riparian Reserves". Prior harvest in these areas has reduced species composition and structural diversity that supports plant, insect, and animal species dependent on these ecosystems.
- There is a need for a restoration of this landscape to a condition that would be resilient to major disturbances such as droughts, insect outbreaks and fires, and to provide and protect habitat for native species and species of concern.
- There is a need to maintain access to the national forest for a range of reasons, including active management, public recreational use, Tribal treaty right activities, administrative purposes, and others.
- There is a need to contribute and strengthen the local economy in a way that sustains both local industry and forest resources.

The Collaborative supports projects that share the goal of increasing the number of acres treated and total harvest volume produced under the Northwest Forest Plan and increasing the number and footprint of aquatic and other non-harvest related restoration projects. We would encourage the Forest to consider expanding the purpose and need to include additional opportunities to implement priority actions on the landscape. This is a large landscape level project that requires a lot of resources over several years. For example, to the extent that some of the harvest units overlap with road maintenance or decommissioning projects identified in the 2016 Nooksack Access Travel and Management plan, there may be opportunities to implement these items post-harvest.

Commercial Restoration Thinning in Late Successional Reserves

We appreciate the goal of 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, in part, 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. There is a large body of research demonstrating the benefits of thinning in dense plantations (e.g., Anderson and Ronnenberg 2013).

We understand that achieving restoration goals for National Forest LSRs within the North Fork Nooksack area 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 proposed action could potentially treat up to 1,798 acres of stands identified as Late Successional Reserves under 80 years old by the Northwest Forest Plan (1994). Up to 537 acres of these would be within the Riparian Reserve.

Our understanding is that none of the units being considered within LSR are overlaid with inventoried roadless areas which would require additional consideration.

Stand Regeneration Harvest in Matrix

The proposed action could potentially treat up to 1,881 acres of stands identified as Matrix by the Northwest Forest Plan through either commercial thinning or stand regeneration. Up to 575 acres of these would be within the Riparian Reserve.

While stand regeneration harvest is not something that the Mt. Baker Snoqualmie National Forest has implemented frequently, this type of harvest is consistent within Matrix under the Northwest Forest Plan. Matrix areas were set aside by that plan as the areas of the forest appropriate for timber harvest and not focused on providing late successional habitat. As a balanced policy that has served Northwest national forests for a quarter century, we feel as a forest collaborative which represents timber and conservation interests that it is important to support all aspects of the Northwest Forest Plan.

Additionally, our understanding is that none of the units being considered for stand regeneration harvest or commercial thinning within the Matrix are overlaid with inventoried roadless areas which would require additional consideration. Also, it is our understanding that current regulations limit gaps or stand regeneration harvest to a maximum of 40 acres. Furthermore, stream buffers for fish-bearing and non-fish-bearing are required within riparian reserves under the Northwest Forest Plan and will reduce the acres available for treatment in this category.

Stand regeneration harvest is focused on maximizing the harvest volume of timber and creating environments that optimize regenerating new cohorts of trees, while protecting critical resources. Regeneration harvests can also facilitate ungulate browse or certain species of berry production. This type of harvest can be accomplished through one of several methods on National Forest land:

1. **Clearcutting Regeneration Method** - The cutting of essentially all trees, producing a fully exposed microclimate for the development of a new age class. Regeneration is likely to be from natural seeding, planted seedlings, or advance reproduction (also called overstory removal). Cutting may be done in groups or patches (group or patch clearcutting), or in strips (strip clearcutting).
2. **Shelterwood Regeneration Method** - A method of regenerating an even-aged stand in which a new cohort of trees develops beneath the moderated microenvironment (i.e., shade) provided by the residual trees. The shelterwood regeneration method can include three types of cuttings: (1) an optional preparatory cut to enhance conditions for seed production; (2) shelterwood seed cut (establishment cut) to establish a moderated micro-environment,

prepare the seed bed, and create a new age class; and (3) a shelterwood removal cut to release established regeneration from competition with the overwood.

3. **Seed-Tree Regeneration Method** - An even-aged regeneration method in which a new age class develops from seeds that germinate in fully-exposed micro-environments after removal of the previous stand, except for a small number of trees left to provide seed to regenerate a new cohort. Seed-tree cuts usually have fewer retention trees than a shelterwood cut. Seed trees are usually removed after regeneration is established unless some are retained to meet other resource objectives (snags replacement, live wildlife trees). Under a two-aged method (seed tree with reserves), some, or all the seed trees are retained after regeneration has become established to attain goals other than regeneration. When the Seed Tree method is employed, the sequence of activities can include 1) seed cut (establishment cut) to establish a new age class and, 2) Steed tree removal cut.
4. **Group Selection Regeneration Method** - A method of regenerating uneven-aged stands in which trees are cut, in small groups, and new age classes are established. The width of groups is commonly approximately twice the height of the mature trees, with small openings providing microenvironments suitable for shade-tolerant regeneration, and the larger openings providing conditions suitable for regeneration that is more shade-intolerant. In the group selection regeneration method, the management unit or stand in which regeneration growth and yield are regulated consists of a landscape containing an aggregation of groups.
5. **Variable Retention Harvest** –, Variable retention is an approach to forest planning and forest harvesting in which structural elements of the existing forest are retained throughout a harvested area for at least through to the next rotation to achieve specific management objectives. The approach utilizes a wide spectrum of retention with varying amounts, types and spatial patterns of living and dead trees. Variable retention uses all silvicultural systems, from single tree selection to clearcutting, to achieve variable retention over a landscape. Retained features may include intact patches or groups of trees, snags, structurally unique and other leave trees, down wood, and other elements.
6. **Early Seral Habitat Creation** – A restoration-oriented form of regeneration harvest, most of the live trees are harvested but retention trees are designed to create complex early seral conditions, including snags, downed logs, and limited live trees. With perennial plants and shrubs, this pathway may support the development of habitat for early seral-associated species such as ungulates, birds, and some small mammals. Tree planting or seeding is often intentionally limited to allow for slow reforestation, mimicking regeneration pathways following large-scale natural disturbance like severe wind or wildfire.

While the scoping notice did not specify, the Draft EA should be clear about which approaches will be used for which units.

Non-Commercial Thinning

The proposed action could potentially treat up to 2,054 acres of stands identified as several different allocations under the Northwest Forest Plan (1994). Up to 581 acres of these would be within the Riparian Reserve and 271 of Huckleberry enhancement.

The scoping notice uses different language to describe the "non-commercial thinning" category of harvest versus the "stand improvement" label on the map. Our understanding is that these two terms are referring to the noncommercial thinning referenced in the scoping notice. The terms should be corrected to avoid confusion in the draft EA.

The draft EA should be clear about whether the non-commercial thinning would be consolidated in specific polygons separate from commercial thinning and stand regeneration activities or overlapping.

Stewardship Contracting Opportunity

The Darrington 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).

While the Darrington Collaborative is working to support stand exam, road inventory and stream analysis in advance of a landscape level restoration project on the North Fork Stillaguamish watershed located within the Darrington and Mt. Baker Ranger Districts, we likely do not have capacity to be directly engaged in a stewardship sale as part of the North Fork Nooksack project.

However, we encourage the forest to utilize one of three mechanisms available to ensure that revenues or receipts from timber harvest as part of this project stay on the forest to be used toward priority aquatic restoration, fish habitat or watershed restoration projects. If not, these revenues will not stay on the forest.

The three options to accomplish keeping timber receipts on the Forest include:

- **Stewardship Contract (working with a local collaborative group)** – Stewardship contracting allows the FS and BLM to apply the value of timber or forest products removed as an offset against the cost of services received, and apply excess receipts from a project to other authorized stewardship projects. Stewardship contracts may be used for treatments to improvement or restore forest health, water quality, to improve fish and wildlife habitat, and to reduce hazardous fuels. Contractors are awarded up to 10-years to stimulate long term investment in the local community. Stewardship contracts require consultation with the forest collaborative.
- **Expanded K-V Funds** – Knutson-Vandenberg (K-V) funds are derived from receipts generated by timber sales. K-V funds are collected for renewable resource projects on individual timber sale areas to only be used in the timber sale area from which they were collected. Activities can include wildlife habitat improvement, fuels reduction (for pre-existing fuels), range improvement, watershed improvement, and noxious weed treatments.
- **Good Neighbor Authority (in collaboration with WA Department of Natural Resources)** – The Good Neighbor Authority (GNA) allows the FS or BLM to work in partnership with state

agencies to implement water and forest management restoration activities on federal lands. Revenue from GNA timber sales can be used to pay for completion of other authorized restoration services as well as cover the cost to the state for preparing and administering the sale. Program income, the portion of the value of timber available for a state to perform or contract out authorized restoration services, is directly based on the anticipated cost of the restoration work and the anticipated cost of administering the timber sale. Unlike a stewardship contract, GNA does not formally require inclusion of forest collaboratives in GNA projects, and a portion of the value of the timber must return to the treasury (Rural Voices for Conservation Coalition, 2018).

We understand that in addition to these options above, there are potential associated benefits to the roads that will be used for timber harvest after the sale. This occurs in cases where road segments in need of necessary maintenance receive that work to implement the sale and can benefit from that work after the sale has been completed. Of note, these improvements are part of the contract with the logger, but culverts and maintenance cannot exceed the previous level prior to the timber harvest. This is different and should be communicated differently than keeping timber sale revenue on the forest for use in aquatic stewardship or other projects through stewardship, expanded KV and Good Neighbor Authority options.

Road Maintenance and Watershed Restoration

We are aware of the many challenges the U.S. Forest Service (USFS) faces with declining budgets and a currently unsustainable and unaffordable road system. With nearly 400,000 miles of roads throughout the National Forest System (eight times the federal highway system), chronic underfunding and increased diversion of funds to forest fires has resulted in maintenance needs in the billions of dollars.

The Mt. Baker-Snoqualmie National Forest has been a leader in the efforts to identify a minimum and sustainable road system. The Forest went the extra mile to gather public input toward implementing the Sustainable Roads Strategy engagement process and subsequent report. We believe there are opportunities in this project to contribute to the vision of a sustainable road system where roads that provide key recreational or administrative access can be prioritized for appropriate maintenance. Additionally, unmaintained legacy roads with high aquatic risk factors that do not provide important access can be removed from the system, helping scarce maintenance dollars to be better prioritized.

Using stewardship contracting, expanded K-V funds, or Good Neighbor Authority, receipts from restoration thinning can be retained on the district and used toward the aquatic restoration of important roads. Some roads on the system that provide key recreational opportunities can be prioritized for a maintenance level (ML) 2 or higher as “open” roads to ensure that their continued use does not lead to negative impacts on the watershed. Other roads may be “stored” as ML1 after use for restoration thinning to avoid aquatic impacts before being used again for an additional restoration thinning or administrative use. Still others would be compelling targets for decommissioning after a single-entry restoration thinning has occurred in Late Successional Reserve stands approaching 80 years old.

Road improvements congruent with restoration goals and objectives maintain a public asset that contributes to the local rural economy and lifestyle. Investment in high-value transportation corridors on Forest Service lands can help prevent catastrophic road failures that result in massive and long-lasting water quality impacts. Such road improvements also provide broad benefit to a growing population of users both rural and urban that enjoy recreational opportunities and the public access that these roads provide.

The scoping notice indicates two projects related to the road system: (1) the Thompson Bridge replacement; and (3) the Canyon Creek reroute. The Draft EA should be clear about the number and mileage of temporary roads as part of the project and indicate the duration and long-term status of each road during and after the project life. It is unclear whether the Forest Service road system would increase or decrease because of this project. Given the focus and effort put forward by the Forest as part of their Sustainable Roads Strategy, the draft EA should evaluate how this project impacts that effort.

In closing, the goals of this project align with that of the Darrington 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. It would also look at stand regeneration within matrix areas consistent with the Northwest Forest Plan and other applicable regulations. In addition, economic benefits would be realized by local communities.

Thank you for the opportunity to comment.

Sincerely,

Dan Rankin
Owner
Dan Rankin Logging Inc.

Tim Johnson
Darrington Mill Manager
Hampton Lumber Company

Megan Birzell
Washington State Director
The Wilderness Society

Tom Uniack
Executive Director
Washington Wild

Paul Wagner
Vice President, NW Washington Project Manager
Atterbury Consultants, Inc.

Oak Rankin
Executive Director
Glacier Peak Institute

Thomas O'Keefe, Ph.D.
Pacific Northwest Stewardship Director
American Whitewater

Jon Owen
Officer, U.S. Public Lands & Rivers Conservation
The Pew Charitable Trusts

Cc: Mt. Baker Snoqualmie National Forest Supervisor Jody Weil
U.S. Senator Patty Murray
U.S. Senator Maria Cantwell
U.S. Representative Suzan DelBene