



April 1, 2021

Greta Smith
District Ranger
Mt Baker Ranger District
810 State Route 20
Sedro-Woolley, WA, 98294

Submitted via: Project Comment Page

RE: North Fork Nooksack Vegetation Management Project Draft EA Comments

Dear Ms. Smith:

On behalf of its members, the American Forest Resource Council (AFRC) submits the following comments on the Draft EA for the proposed North Fork Nooksack Vegetation Management Project.

AFRC represents the forest products industry throughout Oregon, Washington, Idaho, Montana, and California. AFRC's members include over 50 forest product businesses and forest landowners. AFRC's mission is to advocate for sustained yield timber harvests on public timberlands throughout the West to enhance forest health and resistance to fire, insects, and disease. We do this by promoting active management to attain productive public forests, protect adjoining private forests, and assure community stability. We work to improve federal and state laws, regulations, policies, and decisions regarding access to and management of public forest lands and protection of all forest lands. Many of our members have their operations in communities adjacent to the Mount Baker Snoqualmie National Forest (MBSNF), and the management on these lands ultimately dictates not only the viability of their businesses but also the economic health of the communities themselves. The forest products sector in Washington State continues to provide around 40,000 direct and about 100,000 indirect jobs. Many of these jobs are found in rural communities like those in the surrounding areas of the Mount Baker Ranger District and the MBSNF. In addition to the wages paid, the taxes and other monetary transactions generated by these businesses and family-wage jobs, contribute to the infrastructure and well-being of the local communities. AFRC submits these comments on behalf of its members.

Lack of supply of raw materials to fill manufacturing demands for wood products continues to be an issue in Washington. Several mills have closed in the past few years. Vegetation management projects, both current and future, on the MBSNF, can help contribute

to the wood supply in Washington that many mills depend on to continue operation and employment of their workforce. The economic activity created through these treatments contributes to the greater community well-being.

General Comments:

In our scoping comments we had highlighted the somewhat soft position statement in the Purpose and Need related to the economic benefit this proposal can provide to the local community and forest products. We had hoped to see a strengthened description in the EA regarding how the North Fork Nooksack Vegetation Management Project would provide economic benefit to the local community. This could have occurred through both commercial timber management to meet the purpose and need of the project as well as the access benefits this project can provide, including the bridge replacement. Unfortunately, the economic and community well-being aspects of this project are mentioned in passing and glossed over.

Additionally, the stronger incorporation of economic benefit could have highlighted the importance of economically viable commercial projects to generate revenue to fund the substantial amount of non-commercial work identified in this planning area. The MBS has struggled in the past with high non-commercial project costs that have created economically non-viable timber projects. While we understand many of the multiple use objectives of the Forest are of ecological purposes, many of those ecological goals and other use objectives are very difficult to attain without additional revenue sources as those can come from timber management.

Riparian

AFRC is pleased to see proposed treatments conducted in riparian reserves. Past harvest practices have left many of these riparian areas in a structurally simple state. Active management in these areas can provide both ecological and economic benefit to meeting the goals of the overall project. Thinning treatments can accelerate attainment of desired future conditions more consistent with later seral stage and provide timber volume into the marketplace to benefit the economic and community benefit goals of the project.

Operating Season

The MBSNF has taken a very positive step forward in the development of its “Project Design Criteria” related to the Normal Operating Season (NOS). We applaud the MBSNF for the inclusion of “condition based” metrics for yarding and hauling operations outside of the NOS. The ability for operators to extend operations when weather conditions are conducive to yarding and hauling outside of the NOS, increases the potential for economically viable projects. This “condition based” metric in the Design Criteria for operations outside of the NOS has been successful on other National Forests, as well as private and state forest lands, that have similar or more stringent resource protection requirements.

Logging Systems

AFRC is pleased to see the MBSNF looking to incorporating modern harvesting equipment in the allowed logging systems in this proposal. The addition of tethered harvesting systems as appropriate and approved for use in the North Fork Nooksack Vegetation Management Project has the potential to increase economic viability while also increasing the safety of the logging crews conducting the work. Combining the suite of logging systems identified for this project along with the Design Criteria for their use should in general assist in the development of economically viable harvest operations.

Common to Alternatives 1 & 2

The Draft EA identifies that the total treatment acres only amount to 7.6% of the entire planning area. This is an extremely small footprint of the planning area and further reductions in treatment acres is extremely concerning. Since scoping we have already seen roughly a 27% decrease in proposed treated Matrix acres and a 16% decrease in proposed LSR treatment acres. Commercial activities would only occur on about 4.7% of the planning area. We anticipate further reductions in the treatment acres during implementation. In fact, the MBSNF expects an additional 30-50% reduction in treatment acres at implementation.

“According to recent timber sales on the Mt. Baker-Snoqualmie National Forest and project design, treated acreage is expected to be 30-50% of total stand area.” (North Fork Nooksack Vegetation Management Silviculture Analysis pg. 20)

AFRC is extremely concerned that further erosion of treatment acres prior to implementation will significantly harm the ability for the MBS to reach the goals and objectives outlined in the Purpose and Need. Attainment of both the ecological and economic goals of this project will be put at significant risk for failure. We strongly encourage the Forest to follow its analysis and science and resist the temptation to further reduce treatment acres to appease those who wish to see zero acres of treatment occur.

We are also concerned about the apparent lack of plans to replant the openings created in the Variable Density Thinning located on Matrix acres. We understand the desire of the Forest to try and maintain early seral habitat as long as possible in the openings created by VDT treatments, but the larger openings we believe should be replanted. Matrix acres are essentially the only acres that can provide a sustainable source of timber resources from the MBSNF. Reforestation on Matrix acres is critical to this future sustainable source of timber. And from a carbon sequestration perspective is also the right thing to do.

The economic analysis for the two Alternatives is difficult to use for comparison of the Alternatives. The weighted stumpage rate of \$75.48 per thousand board feet (MBF) reflects the typical thinning sales on the MBSNF. In theory a Variable Retention Harvest may produce a higher stumpage rate due to higher production rates than commercial thinning operations. The “Estimated net timber value” may have a greater positive variance in Alternative 1 than that seen in Alternative 2. Making Alternative 1 a better fit with the economic goals of the proposal.

Stand Improvement Treatment

We understand the 271 acres associated with huckleberry enhancement are treating non-commercial trees less than 8 inches DBH and has an associated fuels mitigation component in the proposal. However, we remain uncertain of the true age and diameter of the other 1,533 acres of proposed “Stand Improvement” treatment. The supporting Silvicultural report and the Draft EA imply these stands are between 25 and 50 years of age. This age range is outside of traditional age range for traditional PCT work on other landowners. Assuring and disclosing the stand characteristics on these acres and that there is not a commercial potential is important. We are also interested in what impacts on fuel loading and large wildlife, this work will have on the 1,533 acres. Our experience with “late age PCT” on other landowners has shown the residual cut stems persist on the landscape for an extended period beyond traditional PCT work.

We are also concerned with the scale of PCT work proposed in this project. AFRC generally supports the use of PCT as a silvicultural tool where appropriate. In this case about 38% of the total proposed acres for some form of treatment are in the PCT category. Removing the Huckleberry Enhancement acres, the remaining 1,533 acres of “Stand Improvement” still represents nearly 33% of the total treatment acres. And unless the MBS has additional funding to complete this work, could be a negative economic impact on the overall project if most of this work is tied to commercial timber projects.

Alternative Specific Comments

Alternative 1

AFRC generally supports Alternative 1. The described proposal appears consistent with the original purpose and need for the project. While the number of acres proposed for regeneration harvest through Variable Retention Harvest (VRH) concepts has dropped by 55% from the scoping notice, what is planned does appear to create substantial early seral habitat. We are disappointed to see this level of reduction of treatment in the Matrix but do support what is proposed. Alternative 1 would thin about .009% of the project area and conduct VRH treatments on about 1% of the planning area. This does not account for the potential 30-50% reductions at implementation mentioned previously.

We are also supportive of the proposed treatments in Late Successional Reserves, even if they require a plan amendment. As described in the document this change to allow harvest of trees up to 26” DBH is required to meet the objectives laid out in the Purpose and Need. We would express some concern about the potential timeline to complete this proposed plan amendment. Our experience on other Forests, seeking to manage outside the Regional Ecosystem Office (REO) guidelines for exemption of REO review have taken considerable time to complete approval. We would encourage the Forest to assure completion of this amendment will not harm the timing of future sale targets.

The proposed treatments in both Matrix and LSR land allocations are consistent with Purpose and Need of the proposal and Forest regulations and policy. As we stated in our

Scoping comments, regeneration harvest on Matrix lands is appropriate for production of early seral habitat and supplying timber volume to the marketplace, today and in the future. Active management of forests and manufacturing of long-lived wood products from those forest play an important role in efforts to address climate change and remove carbon from the atmosphere. VRH treatments, benefit both the carbon sequestration and storage in wood products as well as helping the Forest attain its early seral habitat goals in this planning area. We provided additional information on the benefits of forest management and carbon in our Scoping comments.

Alternative 2

AFRC generally does not support Alternative 2. In fact, we fail to see how this proposed alternative meets the early seral habitat goals or the acceleration of Late Successional characteristics, as described in the Purpose and Need. Shifting all Matrix treatments to Variable Density treatments with openings of only ½ to 3 acres in size covering “approximately 10-20 percent of the stand area” at best marginally provides increase early seral habitat over existing conditions. Assuming the maximum number of acres covered by opening, and all 3-acres in size, results in about 92 openings across the proposed Matrix treatment area, or 275 acres of openings. Or to compare Alternative 2 with the early seral created in Alternative 1. Alternative 2 would only create about 29% of the early seral acres of those created by Alternative 1. We fail to see how Alternative 2 meets the stated needs for early seral habitat in this planning area.

We also do not see how the proposed LSR treatments under Alternative 2 meet the goals and objectives of the project. The Forest states in its analysis this Alternative treatment proposal for LSR acres would not meet goal of accelerating habitat development. In fact, the economic and community support is about the only aspect of the Purpose and Need, that this Alternative contributes to meeting.

Thank you for the opportunity to comment on this project. We look forward to participating in the further development of this proposal. Should you have any questions regarding the above comments or would like additional information, please contact me at 360-352-3910 or mcomisky@amforest.org.

Sincerely,



Matt Comisky
Washington State Manager
American Forest Resource Council