SIERRA PACIFIC INDUSTRIES

14353 McFarland Rd. • Mt. Vernon, WA 98273 • (360) 424-7619• Fax (360) 428-6834

VIA online submission: Comment Analysis and Response Application (CARA)

June 9, 2023

Meg Trebon, Midnight Restoration Project Leader
Methow Valley Ranger District
24 West Chewuch Road
Winthrop, WA 98862

Dear Meg:

On behalf of Sierra Pacific Industries (SPI), thank you for the opportunity to provide scoping comments for the Midnight Restoration Project.

SPI is a third-generation family-owned company based in Anderson, California that employs over 6,000 employees nationwide and operates a combined 16 sawmills in California, Oregon, and Washington. These sawmills rely on timber that is generated on Federal Forests, including the Okanogan-Wenatchee National Forest.

In general, SPI supports the Midnight Restoration Project, including the Purpose and Need, and offers the following comments.

1. SPI is glad to see the Methow Valley Ranger District proposing vegetation management on their Matrix lands and LSR lands that will likely provide useful timber products. Lands designated as Matrix are the only lands where SPI can depend on a sustainable supply of timber products, as timber outputs on lands designated as reserves are merely a "byproduct". Therefore, we would like the Methow Valley District to recognize the importance of this supply by **including the provision of timber products into the Midnight Restoration project's purpose & need.** It is important to SPI that this provision is recognized by the Forest Service as a valued objective on Matrix land, and not simply a byproduct as it is on LSR land. SPI believes that the Forest Service should take pride in the fact that they provide a crucial renewable resource to the public that they serve.

   Technical reports from both 2010 and 2012 completed for the Forest Service determined, among other things, that:
   - The forest products sector helps sustain the social, economic, and ecological benefits of forestry in the United States.
   - Product revenues sustain economic benefits that include jobs and income.
   - Ecological and social benefits can be supported by timber revenue to landowners that help keep land in forests and by forest treatments that can help maintain ecological functions.

- Wood products fulfill fundamental needs per capita and have remained competitive with alternate means of meeting those needs.
- US lumber production and demand is expected to increase through 2040.

SPI would also like the Forest Service to recognize the importance of removing timber products from timber sales generated off this project by **adding economic viability & support to the local infrastructure to the purpose and need** of the Midnight Restoration project. Supporting local industry and providing useful raw materials to maintain a robust manufacturing sector should be a principal objective to any project proposed on Forest Service land, particularly those lands designated as Matrix. Studies have shown that for every 1 mmbf of timber harvested, about 12 direct and indirect jobs will be created. As the Forest Service surely knows, the "restoration" treatments that are desired on these public lands cannot be implemented without a heathy forest products industry in place, both to complete the necessary work and to provide payments for the wood products generated to permit the service work to be completed.

2. SPI strongly supports the District seeking approval to do forest health treatments in the LSR stands over 80 years of age. As pointed out, large patches of dense forests have developed across the landscape and many of these stands are over 80 years of age but still of a small dbh size. To accomplish the goal of promoting larger fire-resistant trees and healthy forests for the future, these smaller trees over 80 years of age need to be thinned out.

   Further pointing out the need for treating stands in LSR areas over 80 years is the fact that high-quality nesting and roosting habitat for the northern spotted owl is sparse within the project area, occurring almost exclusively in forests that are highly departed from sustainable conditions. To support the northern spotted owl, there is a need to retain the existing complex forest structure in these small but unsustainable areas. The only way to protect these areas from fire is by reducing fuels and creating resilient structure in the surrounding forest. Since almost all current high-quality habitat exists in locations that are not environmentally suitable for dense forest over the long term, there is also a need to maintain and create dense, complex forests as replacement habitat in locations that will continue to support it as the climate changes.

3. The Cedar Creek Fire of 2021 and the Crescent Creek Fire of 2018 are only two of the many large landscape fires that have burned in the Methow Valley District. In fact, the Midnight Project area has been described as a green donut surrounded by landscapes impacted by stand replacement fires. Without restoration treatments more large fires are sure to occur threatening adjacent property and lives in the Wildland Urban Interface (WUI). With this in mind, SPI encourages the District to treat as many acres as possible in the WUI and to thin trees to wide spacing in the WUI and leave only about 40 sq.ft. of basal area in the treatment areas. This will allow for adequate fire protection and will also increase the vigor of the remaining trees hence making them develop more rapidly into an overstory state.

4. The Plan highlights the need to reduce hazards along ingress/egress routes and improve firefighting effectiveness within and adjacent to Wildland/Urban Interface. As pointed out in the assessment, there are a large number of danger trees and unhealthy trees along most of the major routes within the area. SPI strongly recommends performing shaded fuel breaks along these major roads to not only remove the danger trees but provide anchor points for containment fire lines should a large fire start. SPI suggests treating 300 ft. on each side of the major ingress and egress roads into the project area for public safety. SPI also would support shaded fuel breaks along major ridge lines as a precautionary move for slowing or stopping future wildfires.

5. The landscape evaluation found that there is a need to remove conifers to restore riparian forest overstory and understory composition and reduce fuel loads to mediate fire delivery to and behavior in riparian corridors. Treatments addressing these needs would help protect aquatic systems, maintain, and restore the species composition and structural diversity of plant communities in riparian areas, and maintain and restore habitat to support well-distributed populations of riparian-dependent species, consistent with the Aquatic Conservation Strategy objectives in the NWFP.

   With this in mind, SPI would like to point out that it has been well documented that thinning in riparian areas accelerates the stand's trajectory to produce large conifer trees and has minimal effect on stream temperature with adequate buffers. Removal of suppressed trees has an insignificant short-term effect on down wood, and ultimately a positive effect on long-term creation of large down woody debris and large in stream wood, which is what provides the real benefit to wildlife and stream health. SPI encourages the Forest Service to focus their riparian reserve treatments on a variety of native habitats. The ACS describes the need for treatments that meet the need of multiple habitat types, and we encourage the Methow Valley District to look for ways to incorporate treatments that meet those needs. Utilization of gap cuts to promote early seral habitat in the reserves, treatments to diversify all areas of the reserve, and prescriptions that account for the full range of objectives that the ACS mandates should be considered.

   The tradeoffs that the Forest Service will likely be considering through the ensuing environmental analysis will be between achieving these forest health benefits and potentially having adverse impacts to streams. These impacts to streams typically include stream temperature, wood recruitment, and sedimentation associated with active management. Resource values such as thermal regulation and coarse wood recruitment begin to diminish in scale as no-cut buffers become much larger. SPI believes that the benefits in forest health achieved through density management will greatly outweigh the potential minor tradeoffs in stream temperature and wood recruitment. SPI urges the Forest Service to establish no-cut buffers along streams no larger than 40 feet and maximize forest health outcomes beyond this buffer.

6. SPI would like the District to recognize that one of the primary issues affecting the ability to feasibly deliver logs to local sawmills is firm operating restrictions. As stated above, SPI understands that the Forest Service must take necessary precautions to protect their

resources; however, SPI believes that in many cases there are conditions that exist on the ground that are not in step with many of the restrictions described in Forest Service contracts (i.e. dry conditions during wet season, wet conditions during dry season). SPI would like the Forest Service to shift their methods for protecting resources from that of firm prescriptive restrictions to one that focuses on descriptive end-results; in other words, describe what you would like the end result to be rather than prescribing how to get there. There are a variety of operators that work in the Okanogan-Wenatchee market area with a variety of skills and equipment. Developing this EA contract that firmly describes how any given unit shall be logged may inherently limit the abilities of certain operators. For example, restricting certain types of ground-based equipment rather than describing what condition the soils should be at the end of the contract period unnecessarily limits the ability of certain operators to complete a sale in an appropriate manner with the proper and cautious use of their equipment. To address this issue, SPI would like to see flexibility in the EA and contract to allow a variety of equipment to the sale areas. SPI feels that there are several ways to properly harvest any piece of ground, and certain restrictive language can limit some potential operators. Though some of the proposal area is planned for cable harvest, there are opportunities to use certain ground equipment such as fellerbunchers and processors in the units to make cable yarding more efficient. Allowing the use of processors and feller-bunchers throughout these units can greatly increase its economic viability, and in some cases decrease disturbance by decreasing the amount of cable corridors, reduce damage to the residual stand and provide a more even distribution of woody debris following harvest. Please prepare your NEPA analysis documents in a manner that will facilitate flexibility in the use of various types of equipment. SPI believes that with some of the lighter touch logging methods as mentioned above, the impacts could even be less than those analyzed.

Finally, SPI would like the Forest to examine the days that operations and haul are shut down due to hunting seasons and other outdoor recreation. The logging community has limited operating time at best, and further reductions such as these only makes surviving in the logging business that much more difficult.

7. SPI supports the District in asking for a Forest Plan Amendment to do treatments in old growth units. To accomplish this, two Forest-Wide Standards and Guidelines would need to be amended.

> S&G 5-1: No scheduled or non-scheduled timber harvest or firewood collection shall be permitted in mixed conifer old growth stands [as defined in final Forest Plan EIS, Glossary];
> S&G 19-8: Treatment of natural fuels shall be prohibited in identified old growth stands.

Supporting the treatments comes from a review of new science since the 1989 Forest Plan finding that thinning by harvest and non-commercial prescriptions and treating natural fuels with prescribed fire helps reduce the potential for stand-replacing fires that would otherwise cause long-term damage to FPOG. These amendments would allow understory commercial and non-commercial thinning and prescribed burning (including future

maintenance burning) to reduce the likelihood of this type of fire behavior, thereby maintaining these key features in the project area.

8. SPI supports a Forest Plan Amendment to allow treatments that would reduce deer winter range cover while promoting forage that is much needed for winter survival. Since the Forest Plan was written, new science has revealed that thermal cover is not as critical as forage quality and quantity for winter survival of deer; forage quality and quantity has declined in the project area as forested stands have become denser. In addition, areas of winter range cover in the project area historically contained fewer trees with less canopy closure than currently exists, with lower risk of uncharacteristic crown fire behavior and less vulnerability to insect outbreaks. Further research has determined that the amount of cover needed by deer in the winter is far less than currently specified in the Forest Plan. These amendments would allow treatments that reduce deer winter cover as defined in the Forest plan, promote more forage, and help restore vegetation composition and arrangement to patterns similar to the historic range of variability. These conditions would also help minimize wildfire hazard within and adjacent to the Wildland Urban Interface.

9. SPI supports the Project being planned in part with condition based NEPA. This proposal includes pre-identified specific treatment locations in Riparian Reserves, Late Successional Reserves, Inventoried Roadless Area, Forest Plan Old Growth, and wherever fuel breaks are proposed. On about 25% of the project area outside of these locations, the proposed action includes a condition-based management approach to allow for responsiveness and flexibility between planning and implementation on a landscape that is subject to rapid environmental changes. SPI believes this flexibility is needed for timeliness and accuracy of future treatments.

10. SPI has mixed feelings about thinning up to 4,100 acres of small diameter stands within the Inventoried Roadless Area. This was a very controversial subject in the Twisp EA and there are groups that very strongly oppose this treatment. SPI also questions investing the money into these thinnings when no merchantable material and value would ever be captured. Finally, precommercially thinning this many acres will be very expensive and it's doubtful that money will come from timber receipts.

11. SPI agrees with the District's assessment on climate change that points out areas most suitable for each forest type are shifting due to drought and disturbance associated with the changing climate. By 2055, over a third of dry forest in the Project area is expected to experience levels of drought stress that are currently seen only in habitats that are too dry to support forest. Similarly, three-quarters of the moist and transitional forest is expected to experience levels of drought that are currently characteristic of dry forest. When environmental conditions change, a forest can experience low vigor, low resistance to disturbance, and increased mortality. There is a need to anticipate these forest type shifts and re-align vegetation with its environment to improve climate change resilience.

    SPI would like the Forest to supplement their carbon analysis in the EA by considering the points below from a technical report by the Climate Change Vulnerability Assessment and Adaptation Project (SWOAP) in Southwest Oregon.

- Wood harvested from the forest, especially timber used for durable structures, can be reservoirs of long-term carbon storage.
- Forests and their products embody a closed-loop system in which emissions associated with harvests and product use are eventually recovered as forests regrow.
- Although products may be retired in solid waste disposal sites, they decompose quite slowly, causing carbon to continue to be stored for many decades.
- Products derived from the harvest of timber from national forests reduce carbon emissions by substituting for more energy-intensive materials including concrete, steel, and plastics.

Please see the graph below from the IPCC (2007) that captures the ability of forests to "stack" carbon sequestration and storage through continual harvests.

Please consider adopting the graph below into the Midnight Restoration project analysis.

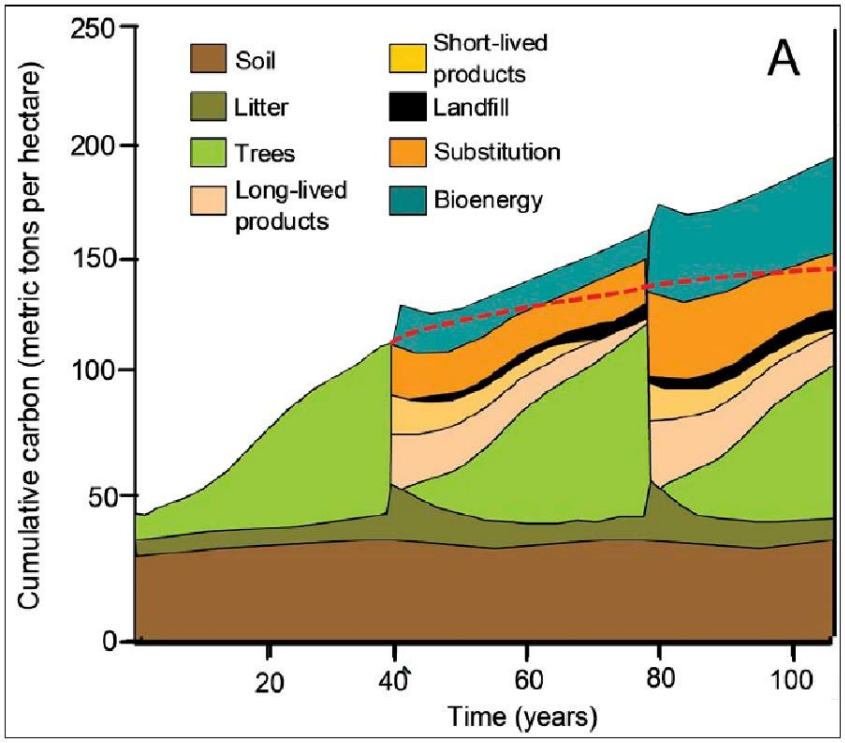

Figure 8.7—Carbon balance from a hypothetical forest management project in which the forest is harvested roughly every 40 years from land that started with low forest carbon stocks. This figure accounts for forest regrowth and carbon stored in wood products in use and landfills as well as the prevented release of fossil fuel carbon (also counted as stored carbon) via product substitution and biomass energy. It illustrates how forests can continue to accrue carbon over time with forest management. Figure is from McKinley et al. (2011) and adapted from IPCC (2007).

SPI believes that this graph encapsulates the forest management paradigm that would be most effective at maximizing carbon sequestration on a per-acre basis by "stacking" storage in wood products and regrowth of newly planted trees.

Thank you for the opportunity to provide scoping comments on the Midnight Restoration Project. We look forward to having some of our suggestions put into the Draft EA.

Sincerely,

Adam Ellsworth
Log Procurement Manager
Sierra Pacific Industries
Burlington Division