



Sierra Pacific Industries

Burlington Division 14353 McFarland Road, Mount Vernon, WA 98273



April 2, 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 Greta,

Thank you for the opportunity to provide Draft Environmental Assessment (EA) comments on the North Fork Nooksack Vegetation Management Project.

Sierra Pacific Industries (SPI) is a third-generation family-owned company based in Anderson, California that employs over 6,000 employees nationwide and operates a combined 12 sawmills in California and Washington. These sawmills rely on timber that is generated on Federal Forests, including the Mt. Baker - Snoqualmie National Forest.

SPI supports the North Fork Nooksack Vegetation Management Project and offers the following comments to improve it;

- Strengthen the description of the economic benefit to the local community within the Purpose and Need. Including, but not limited to; commercial timber management, access benefits, bridge replacement, importance of funding sources for non-commercial projects, etc.
- Maximize Riparian Reserve treatments so that they can reach conditions that are consistent with late seral stage quicker than if left untreated.
- Maximize opportunities that allow for 'condition based' metrics for yarding and hauling operations outside of the Normal Operating Season.
- Maximize opportunities to incorporate modern harvesting equipment, including tethered harvesting systems.
- Maximize the total treatment acres so that goals and objectives outlined in the Purpose and Need are met.
- Replant openings created by Variable Density Thinning on Matrix lands to ensure a sustainable supply of timber resources and maximize carbon sequestration.
- Maximize net timber value by implementing Variable Retention Harvest on as many acres as possible, as outlined in Alternative 1.
- Assure and disclose the stand characteristics (age, diameter, commercial potential, etc.) on the 1,533 'Stand Improvement' (pre-commercial thinning) acres that are not included in huckleberry enhancement treatments.

- Minimize pre-commercial thinning acres that are tied to commercial timber projects.
- Treat the most acres as possible by utilizing Variable Retention Harvest methods as outlined in Alternative 1.
- Maximize commercial treatments within Late Successional Reserves (LSR) even if a plan amendment is required.
- Ensure that the completion of any plan amendment does not interfere with project timeline targets.
- When developing and implementing harvest prescriptions within LSR, eliminate diameter at breast height restrictions so that the Purpose and Need objectives can be met.
- Maximize regeneration harvests on Matrix lands so that early seral habitat can be created, as well as a sustainable supply of forest products, as outlined in Alternative 1.
- Dismiss Alternative 2 as it does not meet the goals and objectives outlined in the Purpose and Need on both Matrix and LSR land designations.
- Maximize carbon sequestration by actively managing as many acres as possible.
- Maximize volume per acre removal across all land designations.
- Maintain and/or improve Net Value of timber sold.

Thank you for the opportunity to provide Draft EA comments on the North Fork Nooksack Vegetation Management Project. I look forward to this project being implemented.

Sincerely,



Adam Ellsworth
Log Procurement Manager
Burlington Division
Sierra Pacific Industries