June 9, 2022

Jody Weil

Forest Supervisor

Mt. Baker-Snoqualmie National Forest

2930 Wetmore Avenue, Suite 3A

Everett, WA 98201

RE: North Fork Nooksack Vegetation Management Project Objection Comments

Dear Ms. Weil,

Thank you for the opportunity to provide Objection 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 16 sawmills in California, Oregon, and Washington. These sawmills rely on timber that is generated on Federal Forests, including the Mt. Baker - Snoqualmie National Forest.

In general, SPI supports the North Fork Nooksack Vegetation Management Project, and would like to make the following suggestions;

***Decision Rationale – Purpose and Need***

Indicators for project success include; acres treated, total acres with timber removal, and volume per acre removal. The proposal could vastly improve upon these metrics.

First, only 2,754 acres, or 4.4%, of the entire analysis area is being proposed for treatment and will likely only decrease as layout and implementation evolves. This leaves, at a minimum, 59,215 acres untreated. Granted, a significant portion of the acreage is located within the inventoried roadless area, there are still thousands of acres that would benefit from treatment. Some of this acreage include the Wells Creek, Deadhorse Creek, and Glacier Creek drainages, as well as Matrix lands. They should be considered for treatment.

Second, the maximum acreage that includes timber removal is only 1,797 acres, or 2.9% of the analysis area. Again, this is likely to decrease even further as specific stand treatments are eliminated for a variety of reasons – unstable slopes, newly identified streams, operational feasibility, etc. There are thousands more acres, within Late-Successional Reserve (LSR) and Matrix, that would benefit from timber removal, helping the forest increase their measure of success.

Third, the relative density (RD) targets within LSR and Matrix after treatment do not maximize volume per acre removal. In fact, the RD after treatment in LSR, 41%, does not even fall into the desired target range of 28%-40%. We highly recommend that the forest reduce RD to the lowest possible percentage of the acceptable range. For LSR this would be to 28%, variable density thinning within Matrix to 28%, and variable retention harvest to 16%. Not only will this accelerate stand development, but will increase volume per acre removal as well. Because the current RD targets are immediately following harvest it is important to note that these stands will continue to grow, and at an increased rate after treatment. As each stand continues to grow, they will eventually grow out of the desired RD target range. By reducing RD to the lowest acceptable target percentage, it will allow the treated stands to remain within the target range for a longer period of time, while improving the measures of success. This is important within Matrix, but even more so within LSR. Nearly 38% of the acres treated with timber removal are located within LSR. This will likely be the final treatment for a particular stand within LSR, so it is imperative that desired targets are reached. Otherwise, under the current proposal, 38% of the total commercial acres treated will not reach the desired condition.

***Rock Sources***

It is encouraging to see that the forest intends to keep certain road segments open for rock source access. We would encourage the forest to seek out other road segments that either have developed sources on them, or have the potential to be developed. Rock sources within close proximity to implementation work will be critical to economic value and help to ensure that implementation is successful. The cost of commercial rock has nearly doubled recently and can be the most expensive aspect of a project. There is no need for any commercial rock to be required as rock sources within the analysis area are present and adequate.

***Conclusion***

Over the last 3 decades a minimal amount of management has been done within the analysis area, which has led to the current condition, including; slope failures and sediment delivery due to lack of road maintenance, overcrowded stands due to lack of thinning, and minimal wildlife habitat due to lack of early seral creation. It will likely be *at least* another 3 decades before any significant management will be done again. Which is why it is critical to do as much as possible, on as many acres as possible, during this entry in order to make a significant impact on the forest. Management on less 5% of the total acreage is simply not enough to make an impact.

Thank you for the opportunity to provide Objection comments on the North Fork Nooksack Vegetation Management Project. I look forward to this project moving forward.

Sincerely,



Adam Ellsworth

Log Procurement Manager

Burlington Division

Sierra Pacific Industries