



The
Mountaineers



April 29, 2016

Peter Forbes
Darrington District Ranger
Mt. Baker-Snoqualmie National Forest |
1405 Emens Avenue North
Darrington, WA, 98241

Submitted by email to FS-comments-pacificnorthwest-mtbaker-snoqualmie-snoqualmie@fs.fed.us.

RE: Joint Scoping Comments on the South Fork Stillaguamish Vegetation Project

Dear District Ranger Peter Forbes:

Thank you for the opportunity to comment at the scoping stage for the South Fork Stillaguamish Vegetation Project. The organizations listed below and the members we represent have a long-standing interest in the Mt. Baker-Snoqualmie National Forest and the Darrington Ranger District, where the project is located.

Washington Trails Association was founded in 1966 and is the country's largest state-based trail maintenance and hiking advocacy non-profit organization with more than 13,500 members and more than 2.5 million unique annual website visitors. Washington Trails Association's mission is to "preserve, enhance, and promote hiking opportunities in Washington State through collaboration, education, advocacy and volunteer trail maintenance." In 2015 Washington Trails Association volunteers contributed 140,000 hours and \$3.5 million worth of service to Washington's public lands and built, maintained and protected 180 trails across the state.

The Wilderness Society was formed in 1935 to protect wilderness and inspire Americans to care for our wild places. Since our inception, we have led the effort to permanently protect nearly 110 million acres of wilderness in 44 states, including Washington. We strive to complete a system of public wildlands that preserve the unique natural heritage of all Americans.

Washington Wild protects and restores wild lands and waters in Washington State through advocacy, education and civic engagement. We have played an invaluable role in permanently protecting over one million acres of Wilderness within Washington State since 1979. Success comes from our flexible, pragmatic approach and our ability to form collaborations and partnerships with diverse allies. We value and seek out a broad array of perspectives, frequently partnering with non-traditional stakeholders and bipartisan voices. We work to create a population of environmentally informed and proactive citizens to build an engaged community of supporters for our work.

The Mountaineers, founded in 1906, is a nonprofit outdoor education, conservation, and recreation organization whose mission is "to enrich the community by helping people explore, conserve, learn about and enjoy the lands and waters of the Pacific Northwest and beyond." Based in Seattle, Washington, we have over 13,500 members and guests in seven branches throughout Western Washington. We support over 1,800 skilled volunteers who lead 3,200 outdoor education courses and activities, and we provide over 4,000 opportunities for youth to get outside each year. We work to protect the outdoor experience and our wild places.

Our organizations appreciate the guidance and consistency that the Northwest Forest Plan has provided for the past 20 years. The plan struck a balance between preserving late successional forests, riparian wildlife habitat and watersheds with sustainable timber harvest. We understand that the proposed vegetation management project is

focused on lands allocated to “Late Successional Reserves” (LSRs) and “Riparian Reserves” under the Northwest Forest Plan. As such we understand that the agency’s focus and expectation is to conduct a thinning project that will “promote forest stand structure that would serve as habitat for old-growth associated species and maintain and enhance Riparian Reserve conditions.” As with any project on National Forest land, timber sale projects should also provide and protect clean water, recreational opportunities, and create natural protection against sedimentation and erosion.

The following are a number of issues we think are important for the environmental analysis to consider.

I. Impacts to Recreational Trails and Opportunities

The Mt. Baker-Snoqualmie National Forest is one of the most visited national forests in the country. The project location includes a large portion of the highly popular Mountain Loop Highway. We are concerned with both direct and visual impacts to trails, trailheads and roads leading to recreation sites as proposed in the scoping notice for the South Fork Stillaguamish Vegetation Project.

Proposed Thinning Near Trails, Trailheads and Recreation Sites

The scoping notice proposes a substantial amount of logging in second-growth stands, including commercial thinning of 3,000 acres of 45 to 80 year old stands; non-commercial thinning of up to 3,750 acres of 20 to 44 year old stands and Riparian Reserve thinning. While the Northwest Forest Plan allows thinning of second-growth stands in LSRs and Riparian Reserves, it is important to recognize that the S.F. Stillaguamish project area is primarily located within the Mountain Loop Highway. The South Fork Stillaguamish project has the potential to affect multiple high use trailheads and trails, as well as national forest recreation sites.

We recommend that the Forest Service remove or relocate any proposed harvesting in areas that intersect trails (for example: Heather Lake, Boardman Lake, Pass Lake, Independence Lake, North Lake) given their popularity and high level of sustained recreational use.

We request more detailed maps as part of the draft Environmental Assessment that clearly delineates the Boulder River Wilderness, trails, trailheads and other recreation sites such as campgrounds.

Efforts should be made to ensure that planned activities in the harvest areas adjacent to trails do not negatively impact the recreational quality and ensure consistency with the MBS forest plan’s visual quality objectives for this landscape. Due to the popularity and high use of the project area, special care should take place to not only leave the areas as they were found, but to improve them as much as possible. We are concerned that the experience sought by hikers, climbers, trail runners and others will be negatively impacted by proposed timber harvests.

Mitigating Recreational Impacts

A number of creative mitigation techniques were developed as part of the Snoqualmie Ranger District’s Hansen Creek Vegetation Project. **We encourage the Darrington Ranger District to implement techniques to minimize the vegetation project’s impact to trails, trailheads and recreation sites, such as:**

- Identify visual quality needs within the project area as part of the Environmental Analysis. For example, measures that were taken in the Hansen Creek Vegetation Project to minimize visual impacts to recreation areas, including trails, could be applied here such as un-thinned buffer zones and additional heavier residual density zones.
- Incorporate scenery management such as visual screening, feathering vegetation and low stump cutting.
- Include recreation site improvements such as trail reroutes and trailhead parking lot modifications.
- Require the contractor to make trailheads and trails open for recreation access from Friday noon through Sunday midnight and extend the opening for holidays between Memorial Day and Labor Day.
- Set windows for trail closures based on highest use periods and trail access periods. Avoid closing trails and trailheads during the peak season (snow-free and Memorial Day through Labor Day).

- Schedule harvest so that no more than one trail is closed at one time, if closures are imminent. Closures should be for a specific time period that does not expand between operating seasons – all activities need to be completed during the set closure time, including necessary restoration work.

In addition, given the popularity of the Mountain Loop Highway corridor, we highly recommend that the Forest Service develop a public outreach plan that includes field trips, open houses, monthly newsletter and other updates to keep recreationists informed.

II. Consistency with Northwest Forest Plan

Any commercial or non-commercial thinning treatments within the LSRs and Riparian Reserves must be consistent with the Northwest Forest Plan's standards and guidelines, which are contained in Appendix C of the Plan's Record of Decision. For LSRs in the western Cascades, the Plan allows commercial and pre-commercial thinning in stands up to 80 years old in order to create and maintain late-successional forest conditions (NWFP ROD, p. C-12). The Plan's standards and guidelines specifically mention thinning of young, even-age, single-species stands as potentially beneficial to LSRs: "thinning these stands can open up the canopy, thereby increasing diversity of plants and animals and hastening transition to a forest with mature characteristics" (ibid.).

Further guidance on the appropriate use of thinning in LSRs is provided in Appendix B of the Plan. In particular, thinning should focus on previously logged plantations that are uniform in age and species: "Thinning prescriptions should encourage development of diverse stands with large trees and a variety of species in the overstory and understory. Prescriptions should vary within and among stands" (p. B-6).

In Riparian Reserves, the Plan generally prohibits timber harvest except for "silvicultural practices ... to control stocking, reestablish and manage stands, and acquire desired vegetation characteristics needed to attain Aquatic Conservation Strategy objectives" (p. C-22-23). Consistency with the nine ACS objectives, which require management to maintain and restore the ecological health of watersheds and aquatic ecosystems, is of paramount importance. Appropriate practices to restore riparian vegetation may include thinning of densely-stocked young stands to encourage development of large conifers (p. B-31). However, road building (including reconstruction) and other ground-disturbing activities associated with thinning can cause significant harm to aquatic resources and therefore must be avoided as much as possible. Past logging and road building in the South Fork Stillaguamish watershed are a major cause of increased landslides, peak flows, and sedimentation that have devastated fish habitat and contributed to endangered species listings of Chinook salmon and other salmonid species. Any thinning-related activity in Riparian Reserves or elsewhere in the South Fork watershed must not further degrade aquatic conditions and fish habitat.

We are concerned that the exceptionally large size of the project area (approximately 3,000 acres of commercial thinning and up to 3,750 acres of non-commercial thinning spread across 65,225 acres) will make it very difficult – if not practically impossible – to design a project within a few months that is fully consistent with the Northwest Forest Plan. The map of the Proposed Action indicates that several dozens of thinning units are under consideration; yet an environmental assessment for the entire project is scheduled to be completed in September. We are dubious that the Forest Service, given its well-publicized reduction in staff capacity, will be able to do an adequate analysis of the second-growth stands, riparian vegetation, soil stability, potential road impacts, and other ecological conditions across such a large and fragile landscape within the next 4-5 months. Therefore, we strongly recommend that the agency make a realistic assessment of the time that will be required to complete a careful and thorough environmental analysis of the project and, if needed, add additional time to the project schedule.

In addition to being in Late Successional Reserves with a stand age less than 80 years, we expect that the stands being analyzed for potential treatment are also second growth and not naturally regenerated. In the scoping and draft plan of the Hansen Creek project, Unit 18 was included for thinning as a naturally regenerated stand. Ultimately this unit was dropped from the final project. We can find no justification for thinning these stands that

largely already exhibit the diversity in age- classes and sizes of trees at the landscape level identified in the Purpose and Need for Action

III. Impacts to Roadless Areas

While most of the proposed units appear to be outside Inventoried Roadless Areas, a specific analysis in the environmental assessment should make clear any impacts from the project, especially with respect to temporary road construction within roadless areas.

Furthermore, this NEPA process affords an opportunity to analyze additional roadless areas in advance of a roadless reinventory for the forest plan revision (unscheduled). The purpose of identifying additional roadless areas is to develop an inventory of areas that can be evaluated for recommendation as wilderness during future forest planning efforts (not as part of this project). For example, the Olympic National Forest has identified new roadless areas as part of several thin sales over the past several years including the Sitkum and West Fork Humptulips projects.

IV. Road Impacts

We are aware of the many challenges the U.S. Forest Service (USFS) faces with its oversized and under-maintained road system and have worked to help address some of the funding challenges. Our organizations have advocated for federal funding for the Legacy Roads and Trails program, which has supported watershed restoration and recreational access projects since 2008. We have also participated in the Mt. Baker Snoqualmie National Forest's Sustainable Roads Cadre over the past few years in support of the Forest's efforts to engage the public and address management and ecological aquatic impacts related to this deteriorating infrastructure while prioritizing maintenance for roads providing access to recreational opportunities.

Today, the road network continues to support forest management activities in addition to a strong recreation economy in Washington state, with at least 63 percent of Washingtonians participating in outdoor activities each year spending \$21.6 billion annually on trips and equipment that supports nearly 200,000 jobs. Unfortunately, road budgets do not support this increase in demand as funding levels have dropped to 18 percent of what they were in 1990.

Roads have considerable impacts that can affect fish, wildlife and clean water. Sediment-laden runoff, from deteriorating roads, pours into streams, changing stream flow dynamics and making them wider, shallower and more susceptible to warming by the sun. Muddy water created by sediment delivered from failing and washed-out roads harms dwindling runs of threatened and endangered salmon that need cold, clear water to thrive and reproduce. Water with excess fine sediment smothers fish eggs when silt settles into clean gravel beds and also harms the gills of salmon and trout. Sediment decreases drinking water quality and increases the need for expensive community water filtration systems.

Roadless areas

Accordingly, we would expect the agency to use existing roads rather than construct new permanent roads to access targeted stands. In addition, this NEPA process affords an opportunity to have a positive lasting impact on the current road system by leaving roads utilized for the project with less aquatic risk to the ecosystem than before implementation through maintenance or decommissioning.

To that end, we strongly encourage you to utilize the recently completed Mt. Baker-Snoqualmie Sustainable Roads Strategy report to make needed modifications to road system. Key findings from the forest-wide study (see p. vii of the report) include:

- Nearly 41 percent of the MBS road system (2,440 miles) has a resource concern of medium or high. The listing of numerous species as threatened or endangered under the Endangered Species Act and a large amount of unstable landscapes contribute to the high mileage of resource concern roads.
- Identified opportunities where about 32 percent (783 miles) of NFS roads analyzed could be decommissioned, closed, or converted to a trail.
- Identified about 64 percent (1,566 miles) of the current road system could be mitigated by reducing road maintenance levels.

The environmental assessment should explain how these findings of the forest-wide study apply specifically to the South Fork Stillaguamish landscape. The assessment should address how the Forest Service will utilize the findings of the Sustainable Roads Strategy to create a more environmentally and economically sustainable roads system that meets the recreational access needs of this landscape. The assessment should also address how the project decision will comply with the regulatory requirements of the travel planning rule at 36 CFR 212.5(b) to identify the “minimum road system” needed for this portion of the MBS and to identify roads “that are no longer needed to meet forest resource management objectives and that, therefore, should be decommissioned or considered for other uses, such as for trails.”

Thank you for considering our scoping comments on the South Fork Stillaguamish Vegetation Project. We look forward to learning more about the project as it develops. We would like to suggest an opportunity to have a field trip to see some of the key areas being considered on the ground with Forest Service staff. This would help us have a better understanding with respect to the concerns we have raised relating to impacts to aquatic and terrestrial ecosystems, recreational investments and preserving viewsheds.

Sincerely,

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