



August 1, 2014

Forest Supervisor Jennifer Eberlien
Attention: Hansen Creek Vegetation Project
Mt. Baker-Snoqualmie National Forest
2930 Wetmore Ave., Suite 3A
Everett, WA 98201

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

RE: Joint Scoping Comments on the Hansen Creek Vegetation Project

Dear Supervisor Eberlien:

Thank you for the opportunity to comment at the scoping stage for the Hansen Creek Vegetation Project. Our organizations listed below and the members we represent have a long-standing interest in the Mt. Baker-Snoqualmie National Forest and particularly the Snoqualmie Ranger District where this project is located.

The Mountaineers is a nonprofit organization dedicated to getting people outside. For 107 years The Mountaineers has been educating and inspiring people to explore the outdoors and enjoy and steward public lands and waterways. Based in Seattle, Washington, we have over 13,000 members and guests in seven branches throughout Western Washington. Our guidebooks and publications inspire countless outdoor adventures world-wide, and our 1,300 skilled and experienced volunteers lead 3,200 courses and activities. We offer over 4,000 opportunities for youth to get outside.

The Wilderness Society has led the effort to permanently protect nearly 110 million acres of wilderness in 44 states since 1935. We have been at the forefront of nearly every major public lands victory. The Wilderness Society's mission is to protect wilderness and inspire Americans to care for our wild places. We contribute to better protection, stewardship and restoration of our public lands, preserving our rich natural legacy for current and future generations.

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 12,500 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 2013 Washington Trails Association volunteers contributed 108,568 hours and \$2 million worth of service to Washington's public lands and built, maintained and protected 190 trails across the state.

Washington Wild protects wild lands and waters in Washington State through advocacy, education and civic engagement. Founded in 1979, we are a membership-based, non-profit organization that has played an invaluable role in permanently protecting nearly three million acres of Wilderness within the state. 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.

Some examples of our long history of involvement and partnership with the Snoqualmie Ranger District include:

- Working diligently with the Forest Service and local stakeholders to advocate as members of the Alpine Lakes Working Group for Wilderness and Wild Scenic River designations in the Middle and South Fork Snoqualmie Valleys for more than seven years.
- Leading efforts to preserve and enhance recreational access opportunities on the Forest, including supporting repairs for the Suiattle, Middle Fork Snoqualmie and Index-Galena roads.
- Advocating for federal funding for the Legacy Roads and Trails program as members of the Washington Watershed Restoration Initiative.
- Supporting the reauthorization of the Federal Lands Recreation Enhancement Act (FLREA).
- Participating in the Sustainable Roads Cadre over the past two years with the interest in engaging the public in a meaningful way for this important analysis.

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 “Matrix” under the Northwest Forest Plan. As such we share the agency’s focus and expectation that any harvest not only meets the goal of providing revenue from timber but also is done in a way that is sustainable for other values the forest provides to the American people. These include providing clean water, recreational opportunities and natural protection against sedimentation and erosion.

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

I. Consistency with the Alpine Lakes Wilderness Additions and Wild and Scenic Rivers Act

We greatly appreciate that the Hansen Creek project at this early stage has recognized the years of work and local support for the legislation pending in Congress that would add (if passed) 22,000 acres of Wilderness and two Wild and Scenic River designations, mostly in the Middle Fork Valley. A minority of the proposed Wilderness additions are in the South Fork Snoqualmie Valley. We agree with the decision to deliberately exclude any potential harvest units from the proposed Wilderness boundary.

II. Impacts to Recreational Trails and Opportunities

The Mt. Baker-Snoqualmie National Forest is one of the most visited national forests in the entire country and the I-90 corridor is perhaps the most popular recreation area on the whole forest. We are concerned with the direct and visual impacts to trails, trailheads and roads leading to recreation sites as proposed in the scoping notice for the Hansen Creek Project.

Proposed Clearings or Openings

The scoping notice proposes a substantial amount of logging in regenerated second-growth stands, including 1,215 acres of thinning and 220 acres of “openings” of up to 30 acres, yielding an estimated 40

million board feet of timber. While the Northwest Forest Plan generally allows logging on Matrix lands, it is important to recognize that the Hansen Creek project area is located within the Mountains to Sound Greenway and the South Fork Snoqualmie River watershed. The Hansen Creek project would affect five very high use trailheads and trails, as well as four major national forest recreation sites. Several of the proposed openings are adjacent to or are visible from these important recreational investments, including the John Wayne Trail, McClellan Butte Trail, Ira Springs Trail, Pratt Lake Trail, Talapus Trail, and associated trailheads.

We recommend that the Forest Service remove or relocate any proposed clearings within harvest units that intersect these trails (including units 8.2, 14, 16.1 and 18.1) given their popularity and high level of sustained recreational use.

Harvest Units

Efforts should be made to ensure that the other planned activities in the harvest units adjacent to these trails (including units 1, 2.1, 2.1, 3, 4.1, 4.2, 5, 8.1, 8.1, 8.2, 8.3, 8.4, 8.5, 9, 10.1, 10.2, 10.3, 10.4, 11), 17.1 and 18.2 do not negatively impact the recreational quality and ensure consistency with the MBS forest plan's visual quality objectives for this highly visible and valued landscape. We are concerned that the experience sought by hikers, trail runners and others will be negatively impacted for a generation of recreationists.

We appreciate the mitigation steps outlined in the scoping notice when there is a potential impact to trails and recreation sites including:

- Scenery management such as visual screening, feathering vegetation and low stump cutting.
- Recreation site improvements such as trail reroutes and trailhead parking lot modifications.

We also agree with comments submitted by the Mountains to Sound Greenway Trust which suggest that the plan:

- 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 and Labor Days;
- 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 through Labor Days).
- Schedule harvest so that no more than one trail is closed at one time. 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 I-90 corridor, we highly recommend that the Forest Service develop a public outreach plan that includes field trips, open houses, weekly newsletter and other updates to keep recreationists informed.

III. Basic Screens for Sustainable Silviculture

The scoping notice identifies a need for early seral habitat and proposes to create forest openings to address that need. The creation of diverse early seral ecosystems in moist Pacific Northwest forests has been proposed by esteemed scientists Jerry Franklin and Norm Johnson (2012) as part of a regional restoration strategy for federal forests. However, Franklin and Johnson caution that the use of

regeneration harvests in younger stands is “the most potentially controversial element” of their restoration strategy because of the resemblance to clearcutting. Due to the exceptional visibility of the Hansen Creek project area, use of regeneration harvest on national forest lands has a high potential for generating controversy. We encourage you to work with landscape architects and recreational users of the area to design a project that reduces potential controversy.

The scoping notice cites to sections of the Northwest Forest Plan that provide regional-scale management direction for Matrix lands to provide for ecological functions. However, the notice does not mention the Plan’s specific management direction for Matrix lands in the Mt. Baker-Snoqualmie National Forest: “site-specific prescriptions should be developed to maintain biological diversity and ecosystem function, including retention of green trees (singly and in patches), snags and down logs” (1994 ROD p. C-41). Please incorporate this requirement of the Northwest Forest Plan into your planning for this project.

We concur with the Mountains to Sound Greenway Trust that Units 18.1 and 18.2 should be re-evaluated and eliminated from timber harvest. These are some of the oldest stands in the project area and will be some of the most politically sensitive. Since these stands are approximately 120 years old, they are well beyond the optimal age for thinning and the benefits thinning would bring. Many of these older trees are part of the viewshed for existing recreational trails.

We also concur with the Greenway Trust’s recommendation to make this a stewardship project that will generate revenue for local ecological restoration projects.

CONCLUSION

Thank you for considering our scoping comments on the Hansen Creek 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 recreational investments and preserving viewsheds.

Sincerely,

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