



March 27, 2015

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 rslipsky@fs.fed.us

RE: Joint Comments on the Hansen Creek Vegetation Project Draft Environmental Assessment

Dear Supervisor Eberlien:

Thank you for the opportunity to comment on the Draft Environmental Assessment 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.

Our organizations and the members we represent have a long history of involvement and partnership with the Snoqualmie Ranger District. We have worked for seven years with the Forest Service and local stakeholders to successfully advocate for Wilderness and Wild Scenic River designations in the Middle and South Fork Snoqualmie Valleys (designated last December). We have led efforts to preserve and enhance recreational access opportunities on the Forest, including paving of the Middle Fork Snoqualmie Road, supporting grant funds for recreational facilities and participation in the South Fork Snoqualmie Recreation Plan. We have advocated for federal funding for the Legacy Roads and Trails program, which has supported watershed restoration and recreational access projects over the past seven years. We have participated 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.

We also 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.

Given the potential for controversy around some of the issues addressed in the EA, we were surprised that the comment period was limited to the minimum of 30 days. We certainly would have appreciated more time to develop more information about the project.

Having reviewed the alternatives in the Draft Environmental Assessment we have the following comments.

I. Remove Unit 18 From The Proposed Alternative

We remain concerned about the inclusion of Unit 18 in the proposed action. These units are generally older than the forest stands in the other parts of the project area. A recent field trip organized by the Mountains to Sound Greenway and the Forest Service (which a number of our organizations attended) confirmed our view that these units are maturing well and would not benefit from thinning.

As the EA itself points out in Chapter 3 when discussing Alternative 4 (EA pg. 160):

“Eliminating unit 18 eliminates the need to mitigate effects to some of the most visually sensitive and highly valued stands in the planning area. The stands within this unit are the oldest in the planning area all the attractive features already present, such as large trees, and an open mid-canopy, and developed cover of understory vegetation.”(sic)

We can find no justification in the EA 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 (EA pg. 3) . We appreciate that the EA includes an Alternative 4 that would not thin these units, but we believe that Unit 18 should be dropped from the preferred alternative as well.

II. Reconsider the Extent of Potentially Controversial and Precedent-setting Regeneration Harvest

We remain concerned about the use of regeneration harvesting in all of the action alternatives, as well as the proposed thinning of mature forest stands (specifically Unit 18) in alternatives 2 and 3.

Regarding the proposed regeneration harvest units, we wish to bring to your attention a recent federal court decision involving a similar logging proposal on Bureau of Land Management (BLM) lands in western Oregon (*Oregon Wild v. Bureau of Land Management*, 6:14-CV-0110-AA, opinion and order filed March 14, 2015). The court ruled that the BLM had violated the National Environmental Policy Act by failing to prepare an environmental impact statement (EIS) for the White Castle Project, which involved variable retention harvesting of 187 acres in nine separate units. Specifically, the court decided that an EIS was required because the regeneration harvesting of mature (80-110 years old) forests was “highly controversial” (opinion and order, pg. 16-20).

The EA for the Hansen Creek Project proposes regeneration harvest on 148 acres in units up to 21 acres in size (EA pg. 14). The EA does not provide information about the age of the forests on these 148 acres. The EA only states that across the 1,347 acres to be thinned or harvested, the trees range in age from 40 to 120 years and that “the predominant age class of stands proposed for harvest is less than 80 years” (EA pg. 4).

As noted in our scoping comments, Franklin and Johnson (2012) 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, we are concerned that the use of regeneration harvest on national forest lands has a high potential for generating controversy.

The use of regeneration harvest would be a stark departure from past Forest Service logging activity in this sensitive recreation area and scenic corridor. According to the EA, the I-90 Corridor Thin project in 2009 commercially thinned 340 acres, and the South Fork Thin in 1995 thinned another 430 acres from similar stands in the same general area (EA pg. 91-92). Use of regeneration harvesting in Hansen Creek could set a precedent for such logging practices elsewhere on other national forest lands. The precedent-setting nature of regeneration harvesting was a factor in the court's decision in the White Castle case (see opinion and order, pg. 22-23).

III. Ensure Consistency With Specific Management Direction for Matrix Lands in the Northwest Forest Plan

We remain concerned that the EA does not appear to address our previous scoping comments regarding the Northwest Forest 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 pg. C-41). In Appendix A of the EA, this comment was noted but no response was provided (EA pg. A-6).

IV. Reduce Impacts to Key Recreational Trails and Investments

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 and one that sees significant recreational activity year-round. We remain 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.

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 Spring Trail, Pratt Lake (Granite Mountain) Trail, and Talapus Lake Trail.

Remove use of the Ira Spring Trail as a road

The Ira Spring trail begins as an old road bed that has not seen use by vehicles in decades. The EA proposes to use uphill skyline yarding in Unit 16w and opening (O16, 1A) requiring .2-miles of the Ira Spring trail be converted to road in the Proposed Action. This trail is a popular recreational asset and it makes no sense to reconvert a portion of it to a road. Other solutions in this specific area exist, including using an existing road below the trail corridor and logging from below which would eliminate the impacts on the trail and reduce impacts on the viewshed. Another alternative is using helicopter logging which is prevalent in other parts of the project. We urge the Forest Service to withdraw the action to convert the Ira Spring Trail to road in the preferred alternative.

Set back proposed logging by 75 ft. from the Ira Spring Trail (Units 16w, 16r and 16q)

We appreciate the guidance in the preferred alternative that recreational investments in thinning units be protected (EA pg. 15): "*In thinning treatments along visually sensitive roads, trails, and Interstate 90, a zone of 75 feet would be left un-thinned.*" Due to use of road 9031 and the Ira Spring trailhead for the project, mitigation should include formal reclassification of the Ira Spring Trail from "dual purpose" to "trail" in the Forest Service records database, increased maintenance of road 9031 for post-sale mitigation and the enlargement of the Ira Spring trailhead parking area.

Set back proposed logging by 75 ft. from the Talapus Lake Trail (Unit 13d)

Given its proximity to the Talapus Lake trail and trailhead, we request that the Forest Service set back cutting in unit 13d to provide an additional special trail buffer along this visually sensitive trail route (as stated in EA, p. 15). Due to use of roads 9031 and 9030, as well as the Talapus Lake trailhead for the project, mitigation should include increased maintenance of roads 9031 and 9030 for post-sale mitigation and the enlargement of the Talapus Lake trailhead parking area.

Set back proposed logging by 75 ft. from the McClellan Butte Trail (Units 8ao, 8x, 8y and 8z)

Given their proximity to the McClellan Butte trail, we request that the Forest Service set back cutting in units 8ao, 8x, 8y and 8z to provide an additional special trail buffer along this visually sensitive trail route (as stated in EA, p. 15). Due to use of roads 5500 and 5500-101, as well as the McClellan Butte trailhead for the project, we recommend the project should include increased maintenance of roads 5500 and 5500-101 and the trailhead for post-sale mitigation.

Set back proposed logging by 75 ft. from the authorized FR 9020/JWPT connector trail - (Unit 8.3)

Given the proximity to the approved and flagged trail creating access between the John Wayne Pioneer Trail and the South Fork Snoqualmie Road to Trail network near Harris Creek, we request that the Forest Service set back cutting on the eastern edge of unit 8.3 to provide an additional special trail buffer. This will not only provide a visual buffer on this sensitive route but will also reduce the costs required for development of this authorized trail.

Ensure protection of the visual quality along the John Wayne Pioneer Trail

The John Wayne Pioneer Trail is Washington's preeminent cross-state trail and we ask that the visual quality of the user experience be protected. Where necessary to achieve this objective we request the application of a special trail buffer of greater retention as well as mitigation measures to minimize visual impacts of users along the trail.

Support the prohibition of target shooting in the project area

The I-90 corridor is one of the most heavily visited recreational areas in the state. The corridor is used by a variety of recreational users year-round. As stated in the EA, the "current public exposure to target shooting . . . has become significantly elevated" (EA pg. 151) since recreational target shooting closures were implemented in the corridor in 2010. We support the Forest Service's approach in the preferred alternative to make this area safer for all recreational users by expanding the area in the South Fork Snoqualmie watershed in which target shooting is prohibited. The closure areas would include all National Forest System land within 150 yards of Forest Service Road 5510 (Hansen Creek Road) from the boundary of the existing closure to the watershed boundary. If closure of this area proves too controversial to be included in this EA, a phased approach that includes a community education campaign may be a feasible alternative. Hunting-related shooting, in compliance with all relevant laws, should continue to be allowed in the area.

V. Use of Stewardship Contracting Authority

The cover letter for the EA (File Code #1950, dated February 20, 2014) states an implementation goal for this project is to use "Stewardship Contracting," which enables the Forest Service to retain receipts locally for use in addressing natural resource concerns in the greater project area. We understand the Forest Service is currently developing a Stewardship Proposal with a collaborative partner, which will be reviewed and, if it meets the necessary requirements, approved by the Regional Office. We support making the Hansen Creek Vegetation Project a stewardship contract or

agreement, which will ensure that revenues generated by the sale are returned to the forest for ecological restoration projects to better meet local needs. We know this authority has been rarely used on the Mt. Baker-Snoqualmie National Forest and look forward to monitoring its implementation, utility, and efficacy in this project area as well as working with the collaborative partner to ensure funding is directed to projects of greatest local concern or need.

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

With the signing into law last December of the Alpine Lakes Wilderness Additions and Middle Fork Snoqualmie and Pratt Rivers Protection Act, we appreciate that all alternatives are consistent with the expanded Alpine Lakes Wilderness boundaries. We expect that over the next several months, the Mt. Baker-Snoqualmie National Forest will survey a legal boundary based of the recently designated Wilderness additions. As some of the harvest units are adjacent to the Wilderness boundary, we would expect that no harvest of any units would occur until such legal boundaries were confirmed by the agency. The anticipated length of this project should allow for any flexibility to comply with this request.

CONCLUSION

Our organizations understand the interest in restoration thinning and other uses on the Forest identified in the Purpose and Need for this project. We feel the preferred alternative can and should be adjusted to respond to input from the public that embraces and preserves the significant investment in recreational infrastructure over the past decades within the I-90 corridor.

Thank you for considering our comments on the Hansen Creek Vegetation Project Draft Environmental Assessment.

Sincerely,

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