



December 3, 2019

Senator Patty Murray
154 Russell Senate Office Building
Washington, DC 20510

Congressman Derek Kilmer
1410 Longworth House Office Building
Washington, DC 20515

Senator Murray and Congressman Kilmer,

AFRC staff and member company representatives appreciate the recent opportunity to meet with your staffs and Wild Olympics proponents to discuss AFRC's July 2019 letter to the House Natural Resources Committee outlining concerns with the Wild Olympics and Wild and Scenic Rivers Act (H.R. 2642/S.1382). We also appreciate your many public statements about the importance of maintaining working forests, forest products industry jobs, and economic vitality for rural communities on the Olympic Peninsula. I am writing to follow up on the discussion that occurred during our November 4, 2019 meeting in Tacoma, providing specific suggested changes to the legislation that we would like you to carefully consider and incorporate into the legislation.

As you know, our industry has fundamental concerns about the impact of sweeping Wilderness designations on the Olympic National Forest (ONF), which limit the discretion of the agency, increase management complexity and costs on the ground, and will have environmental and socioeconomic impacts to nearby communities. At the same time, our members work, live, and recreate on these public lands and share Washingtonians' conservation values of clean air, water, and resilient national forests. The below suggestions are based on our members' experience and expertise and are offered with the intent of improving the legislation and maintaining working forests.

In terms of impacts to working forests, Wild Olympics proponents have cited a 2012 analysis by Derek Churchill to conclude that the Wild Olympics proposal would have a minimal impact on current timber operations. It is critical to put that analysis and its assumptions into context.

First, the Churchill analysis screened out tens of thousands of acres based on the current ONF forest plan administrative limitations for harvesting trees less than 80 years old (>80) within Late Successional Reserves. However, these administrative limitations could change in the next ONF forest plan to reflect new science and adaptive management of a dynamic ecosystem. The Churchill analysis did not consider whether these stands would benefit from potential treatments, but rather used the current >80 year-old restriction to show that the proposed Wilderness areas wouldn't impact the ONF's current timber sale program that is focused on thinning younger stands. It is important to note that members of the Olympic Forest Collaborative have discussed areas where treating LSR stands >80 years old may be appropriate to enhance stand conditions. Designating these areas as Wilderness will permanently foreclose any future opportunities to treat these stands – irrespective of their current condition.

The Churchill analysis also screened out over 3,600 acres of manageable acres that were located more than 1,400 feet from roads for ground-based and cable-based logging and more than ½ mile from roads for helicopter logging. This screen assumes that the Forest Service would never propose a temporary road to treat these stands and is unclear whether these stands were personally visited to determine whether unmapped, legacy roads may exist to provide access to these areas. It is also important to note that the Churchill analysis did not consider potential impacts from Wild & Scenic River designations on timber management activities on state and federal lands.

We offer the following suggestions for your consideration:

Remove potential wilderness areas from the proposal

Our review of the proposed and potential Wilderness areas indicates they include about 28,000 acres of stands less than 100 (<100) years old – see chart for age breakout. We do not have the time or staff

Wilderness Type	Stand Age Classes		
	Potential	Proposed	Grand Total
1 to 20		39	39
21 to 40	1,905	2,370	4,274
41 to 60	1,225	4,295	5,521
61 to 80	423	3,495	3,918
81 to 100	401	13,897	14,298
Grand Total	3,290	24,096	28,049

resources to conduct extensive field reviews of all these acres to determine the extent to which they would benefit from future timber management or consider all the current management limitations, including Roadless Rule restrictions. However, we do note the high proportion of stands less than 60 years old in the roughly 5,000 acres of potential wilderness areas, which also include Forest Service roads. Over 60% (3,100 acres) of this

“potential wilderness” area includes previously managed stands that are younger than 60 years old.

These are areas that have been open to past timber management activities and are more likely than other areas to remain open for responsible forest management. Proposals to permanently obliterate roads or restrict future timber management activities can be addressed administratively through the forest plan revision process, which includes opportunities for public comment and review – rather than predetermining an outcome through the legislative process. We suggest that the roughly 5,000 acres of potential wilderness areas be removed from the legislation.

Remove all Wild & Scenic designations that overlay Washington DNR trust lands

Some of the proposed Wild & Scenic River designations overlay state trust lands managed by the Washington DNR, which is required by law to manage the lands for sustainable timber harvests to generate revenue for trust beneficiaries. We are concerned the inclusion of these lands could expose the DNR to additional procedural burdens under Washington’s State Environmental Policy Act, third-party lawsuits, and heightened opposition from those who oppose timber harvests on state trust lands. Senior DNR officials have confirmed that they also shared similar concerns with Congressman Kilmer’s staff.

For example, applying a ¼ mile buffer to these Wild & Scenic Rivers could impact the management of 4,332 acres of DNR state trust lands. This is an unacceptable outcome for the forest products industry and the beneficiaries who rely on timber harvest revenues to fund essential public services. If the Wild

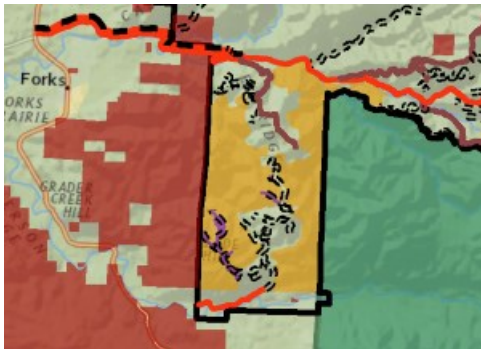
& Scenic designation would change the management paradigm of the corridor, it would clearly have an impact on the land base available for sustainable timber production. If the designation would *not* change the management paradigm of the corridor, we question why the designation is included. For this reason, we request that the Wild & Scenic River designations that overlay DNR lands be removed from the legislation.

- Dungeness River – 1.7 miles
- Matheny Creek – 5.0 miles
- South Fork Hoh River – 2.1 miles
- Hamma Hamma River – 3.9 miles

Remove or modify the proposed and potential Wilderness designations in two areas where they may impact the management of Washington DNR trust lands.

We appreciate the inclusion of savings clause language in the legislation regarding buffers. However, in practice, designating Wilderness immediately adjacent to DNR trust lands could expose the DNR to additional procedural burdens under Washington’s State Environmental Policy Act, third-party lawsuits, and heightened opposition from those who oppose timber harvests on state trust lands. Senior DNR staff have indicated that they also share this concern.

Proposed Wilderness near Reade Hill/Elk Ridge Area East of Forks



This proposed Wilderness area (in yellow) would expose Washington DNR trust lands (in maroon) to significant areas of adjacency to designated wilderness areas. The potential Wilderness area also includes a road (in purple) that could be important to providing future access to the southeastern side of this large block of DNR trust lands.

This proposed Wilderness area also includes a large

proportion of previously managed stands less than 100 years old (in bright yellow). These stands are near roads, are not designated as Roadless Rule areas, and represent areas where future timber management activities could occur. As currently constructed, this proposed Wilderness area is transected by a road and large swaths of young stands less than 80 years old (in green).



We respectfully ask that this area be removed from the proposal or that the boundaries be modified.

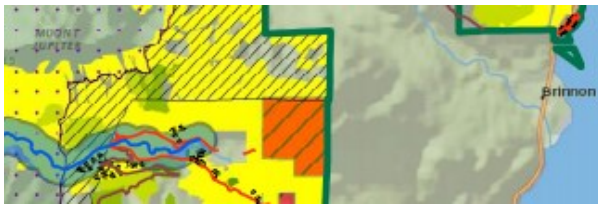
Proposed Wilderness areas adjacent to DNR trust lands West of Quilcene and Brinnon

The proposed Wilderness in the Green Mountain area West of Quilcene would share a large boundary with DNR state trust lands. At the very least, we ask that the boundary be modified to create a buffer between the DNR lands and any proposed Wilderness.



However, we believe there are strong arguments for removing the Green Mountain area from the Wilderness proposal. The area is dominated by stands less than 80 years old (in green) and stands less than 100 (in bright yellow). Wildfire has also shaped this area’s recent history; in fact, most of this area has naturally regrown after a large fire. Retaining the ability for limited, proactive forest health treatments would be wise as climate change continues to increase the risk of wildfire on the Olympic Peninsula. This is particularly true on the drier, eastern slopes of the Olympic National Forest in close proximity to non-federal lands and residential areas outside of Quilcene. While it is true that most of the Green Mountain area is currently designated as a Roadless Area, this could be modified in the future as conditions

change. It is also important to note that looking at the entire Wild Olympics proposal this proposed Wilderness area is an eastern outlier and is surrounded by non-federal lands to the east and a major road and managed timber stands to the west.



We also request that the boundary of the proposed Wilderness area west of Brinnon be modified to create a buffer between the DNR lands and proposed Wilderness.

Ensure Forest Service vegetation management program is not impacted by Wild & Scenic designations

Proposed Wild & Scenic River	Stand Age Classes				Grand Total
	1 to 20	21 to 40	61 to 80	81 to 100	
Big Quilcene River	314	187	332	75	908
Bogachiel River	17	51			68
Dosewallips River	159	23	18	47	246
Duckabush River	66	13	14	126	219
Dungeness River	74	141	164		379
East Fork Humptulips River	109	703	1,377	171	2,361
Gray Wolf River	11	28	65	153	257
Hamma Hamma River	217	2	31	297	548
Matheny Creek	4	781	1,040	159	1,984
Middle Fork Satsop River	26	684	758		1,468
Queets River	5				5
Quinalt River	7				7
Sams River	220	433	893	14	1,559
Sitkum River	12	672	876	287	1,848
Soi Duc River			53	9	63
South Fork Calawah River		9	101	93	203
South Fork Skokomish River	1,132	264	953	961	3,309
South Fork Soi Duc River	43	399	665	571	1,677
West Fork Humptulips River	673	657	941	268	2,540
West Fork Satsop River	38	84	1,203	341	1,666
Wynoochee River	162	245	678	123	1,207
Grand Total	3,290	5,374	10,163	3,695	22,522

Wild Olympics proponents have stated that Wild & Scenic designations will not alter the Forest Service’s ability to conduct vegetation management activities within the ¼ mile buffers along designated rivers. Our experience with Wild & Scenic designation has been different. We remain concerned that the legislation will make it much more difficult for the Forest Service to conduct thinning activities within the Wild & Scenic buffers. In fact, groups have successfully sued to stop Forest Service management activities within the sight of rivers designated

as Wild & Scenic, including activities occurring beyond the ¼ mile buffer. A recent example of this is the Johnson Bar Project in Idaho's Nez Perce-Clearwater National Forest.

In addition to the 132,000 acres of proposed and potential Wilderness included in the Wild Olympics proposal, almost 60,000 additional acres of the Olympic National Forest outside of the proposed Wilderness areas will be further restricted under the ¼ mile buffers from the Wild & Scenic River Act designations – including over 22,000 acres of previously managed and young forests (<100 years old) (see chart).

We request the sponsors consider 1) modifying the Wild & Scenic designations outside of the proposed Wilderness areas to remove the areas with the greatest proportion of young, previously managed stands within the ¼ mile buffers; or 2) adding savings language to the legislation clarifying that the Wild & Scenic River designations shall not affect the ability of the Forest Service to conduct thinning and other vegetation management activities within or nearby the Wild & Scenic buffers consistent with the Olympic National Forest Land and Resource Management Plan and other applicable federal law.

We also urge the sponsors to accommodate the Forest Service's request that it be relieved from the deadline in Section 3(d) of the Wild and Scenic Rivers Act for completing a Comprehensive River Management Plan (CRMP) within three fiscal years of designation. H.R. 2642 would designate 19 new Wild and Scenic Rivers on the Olympic National Forest alone. Preparing these CRMPs will consume scarce agency staff time and resources – resources that could be better spent addressing actual on-the-ground conservation challenges or initiating an overall plan revision for the Olympic National Forest, which has not been updated since the 1994 Northwest Forest Plan. Requiring the agency to finalize CRMPs within the three fiscal year statutory deadline also subjects nearby projects to future potential litigation if the Forest Service is unable to comply with the deadline, which has occurred in other areas.

Again, we want to thank you for considering our concerns and input and the opportunity to provide additional feedback to the proposed legislation. We share a common interest in increasing forest resiliency and health, while also growing rural economic opportunity and vibrancy. AFRC and its members stand ready to work with you and your offices as you consider additional changes to the proposal.

Sincerely,

A handwritten signature in black ink, appearing to read "Travis Joseph". The signature is written in a cursive, flowing style.

Travis Joseph
AFRC President