



Olympic Park Advocates

168 Lost Mountain Lane
Sequim, WA 98382

August 21, 2022

To: Kelly D. Lawrence, Forest Supervisor
c/o Deborah Kill
Olympic National Forest
1835 Black Lake Blvd. SW
Olympia, WA 98512

Olympic Park Advocates would like to share some general thoughts on the scoping phase of the Canyon Forest Restoration Project. We support forest restoration thinning when it addresses dense, single species-dominated, managed stands that are over-stocked and lacking in habitat diversity. Most of treatment areas in the proposed project seem to fall within this category. However we are concerned that the size and scope of the proposed project includes many acres (close to half the acreage) of older, naturally regenerated, fire-originated stands. As you know, these stands generally exhibit a greater diversity of species, age, and habitat structure. They contain an abundance of coarse woody debris, dead snags, and increasingly larger trees as stands naturally develop. They are evolving at their own pace toward more structurally diverse, late successional and eventually old-growth forests.

Critically, these stands are far less accessible than previously harvested stands, lacking road systems and landings. In an area hosting a high density of steeply incised salmon streams, including habitat for federally listed stocks, this is a primary concern. For these reasons, we question the statement in your background information that management activities "... will focus on the condition of the forest, rather than stand age or the type of disturbance from which the stand originated."

We believe that variable density thinning, with sideboards for canopy closure, gap openings, and protected skips, is much more appropriate for managed stands than naturally regenerated fire stands. Since roughly half the proposed project, some 922 acres, is made up of these latter stands, we suggest you revisit the scope of the project and focus primary on the densely planted managed stands where road systems and landings already exist. We request the Forest monitor the results of treatments on these stands before committing such a large amount of older, naturally regenerated stands to intensive treatments.

While it is true that restoration thinning can speed up the development of larger trees and more canopy layers, this must be weighed against impacts of new road development in these stands. No estimated mileage of new road construction is supplied in the scoping documents. But all roads, even temporary roads, can deposit sediments into salmon streams and tributaries, provide vectors for non-native and invasive species, open stands to avian predators, and invite illicit quad and dirt bike incursions, all of which degrade fish and wildlife habitat. Thinning makes sense in stands that have already experienced road construction, much less so in unmanaged stands.

Would it not be better to treat primarily managed stands and monitor treatments for desired habitat affects before committing nearly 1,000 acres of older naturally regenerated stands to management? We think this would be the wiser course.

Thank you for this opportunity to comment on the scope of this project. We look forward to commenting in more detail during EIS phase of planning.

Sincerely,

Tim McNulty
Vice president
Olympic Park Advocates