

**Alpine Lakes Protection Society • Friends of Wild Sky
North Cascades Conservation Council • Pilchuck Audubon Society • Sierra Club
Washington Wild**

March 25, 2014

Elizabeth O'Neal
Washington State Department of Natural Resources
SEPA Center
P.O. Box 47015
Olympia, WA 98504-7015

Via email to: sepacenter@dnr.wa.gov

Re: Singletary Timber Sale / Reiter Forest Trail System
File Number 14-031102

Dear Ms. O'Neal:

On behalf of the undersigned organizations we are writing to comment on and express our concerns about the Mitigated Determination of Non-Significance (MDNS) for the Singletary timber sale 89642. Despite many of our organizations being intimately involved in the Reiter trails effort, we only learned of the SEPA notice last week. With more notice, we expect that more organizations would have been able to weigh in on this important issue.

We have significant concerns about this timber sale, many of which we have expressed in meeting with Washington Department of Natural Resources (DNR) timber staff, with the DNR Northwest Region Manager, and with the Commissioner.

Our groups have worked with DNR staff over the years, to assist DNR in just about all aspects of planning and management of the Reiter Forest area. This collaborative effort represents a significant investment by DNR staff, Snohomish County and local stakeholders to provide a mix of motorized and non-motorized recreational opportunities. Collectively, we have hundreds of hours invested in the Reiter process.

We have not opposed any previous timber sale in the Reiter Forest. But we must object to the Singletary timber sale. We feel that it is quite simply the wrong sale in the wrong place at the wrong time. We request DNR to delay this sale until a full review of the recreation and ecological potential of this area is conducted by the Reiter Foothills Advisory Committee and Snohomish County elected officials.

The Singletary sale is located in an area of very high public values. The proximity to Wallace Falls State Park, to which this sale is immediately adjacent, is of great concern. The MDNS must

consider the impacts of the Singletary sale on the State Park, including, but not limited to, the effects on visitors to the Park. DNR especially needs to address the likelihood of blowdown trees which will occur on the State Park land considering that the sale borders it directly for over 4,000 linear feet.

The MDNS does not adequately address the scenic and recreational components required under SEPA. We believe that the sale will have a significant impact on the aesthetics of the Stevens Pass Highway Greenway corridor which has been designated both a National and State Scenic Byway. One of the major landmarks along this corridor is Wallace Falls and this clearcut will mar this viewscape for decades. This is not addressed in the SEPA review. We believe that a clearcut so close to an iconic landmark will significantly impact the aesthetics of the falls and subsequently degrade the value of Wallace Falls State Park. The language in the SEPA documents describing the “matrix of forests in the vicinity” ignores the specifics of this iconic landmark and the state park and this language demonstrates a lack of appreciation of the aesthetic values which should be required in a SEPA process. The impact on the viewscape of the falls, the Greenway and State Park need to be addressed before this process continues.

The MDNS also did not consider the effects of logging noise on recreation in Wallace Falls State Park. This would have significant impacts on hikers across the river from logging activities, hoping to enjoy the quiet beauty of the area.

The nearby Cascade gateway communities of Monroe, Sultan and Gold Bar have invested heavily in the beauty of the Highway 2 corridor as a tourist and recreational attraction. This view is one of the critical elements of the Stevens Pass Greenway. The SEPA process must consider how this timber sale will affect efforts to build a recreation-based economy in the Skykomish valley.

Furthermore, the new trail to Wallace Falls which goes through this clearcut has significant recreation and aesthetic value. The mitigation strategy of not marking leave trees with paint will not mitigate the adverse scenic impacts of placing a clearcut in the middle of a trail. A better mitigation strategy which should be considered would include moving the trail or redesigning the sale so that it does not impact the aesthetics of this area and the recreational experience. The impact on the aesthetics of the trailhead recently purchased by Snohomish County also needs to be addressed. This SEPA process is inadequate until a full study of alternative options has been addressed.

The maps included in the SEPA documents are seriously flawed. Maps for this project should show the existing trails, the proposal for trail additions, the location of the proposed trailhead, the location of the full State Park boundaries and the two tiers of Wallace Falls. Without including these on the sale maps the public does not have full access to valuable information about this proposal.

The MDNS did not consider the values this woodland provides in terms of low elevation forest

habitat that has been undisturbed for nearly 90 years. "Second Wave" logging has taken almost all the "virgin second growth" forest which has disappeared from most of western Snohomish County except for this area. DNR should examine the values of the naturally regenerated mature forests here, an increasingly rare habitat at such low elevations. Most of the sale area is below 1,000 feet.

Also of great concern is the ecological connectivity this area provides between the State Park and the Wild Sky Wilderness. At present, this forest provides a direct wildlife corridor between these two protected areas. This will be lost if the Singletary sale goes ahead. Such corridors are essential to the health and diversity of wildlife populations.

The purported SEPA Checklist goal of facilitating acceleration of Northern Spotted Owl habitat in remaining stands through "management" via the new road systems is unproven and counterintuitive. The owl (and the Marbled Murrelet) will best be helped by leaving this large block of contiguous forest to become future nesting habitat. Forest "management" activities such as thinning have far more deleterious effects than any supposed benefit that may come from accelerating the rate of remaining tree growth. It should be noted that it is unknown whether even this (increased tree growth rate) benefits the forest, or the owl; for slowly growing trees are different in many ways from those that grow more quickly.

Other mitigation measures proposed by the MDNS, such as leaving eight trees per acre as future wildlife trees, are inadequate. These isolated trees are highly likely to blow down. Furthermore, the proposed logging will greatly increase edge effect for the remaining forest, which will persist even as the cutover land revegetates. Such edges are notoriously harmful to Marbled Murrelets and other wildlife species dependent on old forests.

New road construction is proposed in two forested wetlands. The proposed measure to mitigate this impact is creation of new wetland of equal acreage (1:1 replacement ratio). Artificially created wetlands are notoriously unsuccessful at replacing all the functions of the lost wetlands. Therefore, if this measure is to be utilized, the replacement wetland acreage should be much greater (we propose 2:1) than that destroyed by the road. These constructed wetlands should be fully functional *before* the road is built. It is also critical that culverts be designed to allow hydrologically and biologically effective connectivity above and below the road. These issues were not adequately addressed in the MDNS.

The logging prescription specifies cable and ground-based yarding, with only the leading ends of logs suspended, even where yarding occurs across streams. Dragging the tail ends of logs through streambeds could significantly impair stream habitats and water quality.

The post-sale planting treatment calls for immediately planting a grass seed mixture, not to exceed 0.5% weed seed. Thus, it is guaranteed that this sale would introduce invasive weed species, which would readily spread across the Wallace River to the State Park. The MDNS does nothing to mitigate for this harmful effect, nor for that of the artificial fertilizer that would

be applied and subsequently leach into the Wallace River. Instead, erosion should be controlled by planting appropriate native species.

Although the SEPA Checklist notes that there are steep slopes (up to 90 % grade!) on the site, it does not stipulate adequate protection measures for these areas. The document acknowledges the potential for mass wasting, but maintains that the stream buffers (30 to 165 feet) are adequate to prevent any sediment reaching the streams. Perhaps this assertion should be reassessed in light of the recent tragic mudslide at Oso on the North Fork Stillaguamish River, which extended for nearly a mile.

We are also concerned that the Singletary timber sale would squander the opportunity for DNR to contribute an important new recreational resource to the local economy and the recreational community. For decades, Reiter Forest was literally over-run with unmanaged off-road vehicle (ORV) use and had suffered extensive damage. Over the last few years, we spent hundreds of hours helping DNR to identify and repair the damage and design a more sustainable trail system for both motorized and non-motorized users. All of Reiter was closed to ORVs for three years, while parts of the forest were designated as separate motorized and non-motorized areas and proposed trail systems were planned by DNR and volunteers, including hiking, equestrian and mountain-biking trails in the non-motorized area.

Reiter's non-motorized trail system will eventually link with the adjacent Wallace Falls State Park trails, and provide a new eastern approach to the Falls. The new trail plans are designed to relieve the overcrowding that can occur on the trails in Wallace Falls State Park, which receives more than 160,000 visitors each year. . The Singletary timber sale is in the heart of the non-motorized area – right on top of the “trunk trail” for hikers, horses and mountain bikes – and thus the timber sale would undermine the effort to relieve pressure on the State Park and showcase the Reiter management success story. The new non-motorized trails can hardly be expected to attract significant numbers of trail users when those users realize the trails are in a clearcut.

The area of this sale meets the requirements of the Trust Land Transfer program. It has extremely high recreational and scenic value. Therefore the DNR should evaluate the possibility of this area being placed in the Trust Land Transfer program as either an addition to the NRCA program or Wallace Falls State Park. A public comment period should be part of this process.

Finally, the sale should be postponed until Snohomish County elected officials have the opportunity to evaluate this area for addition to a Snohomish County Park.

Thank you again for allowing us to register our concerns about the Singletary Timber Sale. We strongly recommend that the DNR postpone the sale to allow time to find a solution. We are looking forward to hearing from you soon and are available for any questions at the telephone numbers or email addresses below.

Very truly yours,

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