

# North Fork Stillaguamish Landscape Analysis Project Scoping Comments

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Please consider these comments for the North Fork Stillaguamish Landscape Analysis Project Scoping.

## 1. Temporary Roads

Should temporary roads be deemed necessary to implement a proposed action, I would strongly encourage the Forest Service to provide details about their anticipated locations. I bring this up because at least one other Region 6 national forest is refusing to provide this geographic information in their analysis even though they are providing the cumulative road mile length value. Please provide the whole picture when disclosing these impacts.

## 2. Habitat Connectivity Impacts

I have some concerns about degradation of habitat connectivity if some units are treated. For example, Road 28 in the vicinity of Crevice Creek bisects some old forest stands with large trees (Spotted Owl Habitat) but all around these stands are scoping units that provide connectivity between the older stands. For example, the scoping unit bisected by Road 28 at Milepost 5.0, the scoping unit upslope of Road 28 at Milepost 8.837, the scoping unit upslope of Road 28 at Milepost 11.295, the scoping units bisected by Road 18 at Mileposts 18.837 and 19.775.

## 3. Carbon Sequestration / Climate Change Impacts Analysis

I would like to see the Forest Service conduct some meaningful analysis in their Climate Change report. Research such as Turner & Guzy (2004)<sup>1</sup> found that stands younger than 14 years of age had a negative carbon sequestration and Suchanek et al (2004)<sup>2</sup> found that stands younger than 20 years had negative carbon sequestration rates. Smith et al (2006)<sup>3</sup> and Gower et al (2006)<sup>4</sup> estimate that 46% of stored carbon is released back into the atmosphere as logging residue. Lastly, Hoover & Smith (2021)<sup>5</sup> found that wet (west side) Washington forests store 131.8 tons of Carbon per hectare (53.33 tons / acre) and sequester an additional 1.66 tons per hectare (0.67 tons / acre) of additional carbon per year.

The Forest Service is proposing to treat some stands that are as young as 27 years old and the rest are just beginning to hit their stride in terms of carbon sequestration. The stand Forest Service response is that project impacts are inconsequential to global carbon sequestration. While this is technically true, they are contributing to carbon loss. The real question that the Forest Service should be addressing is this- what would the carbon sequestration status be if no

action is taking and where would carbon sequestration be if the project's proposed actions are adopted? The research and numbers are there to do the analysis.

Thank you,

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**References Cited in these Comments:**

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