



# SIERRA PACIFIC INDUSTRIES

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May 22, 2022

Gretchen Smith  
District Ranger  
Darrington Ranger District  
1405 Emens Avenue North  
Darrington, WA 98241

RE: North Fork Stillaguamish Landscape Analysis Scoping Comments

Dear Gretchen,

Thank you for the opportunity to provide Scoping comments on the North Fork Stillaguamish Landscape Analysis.

Sierra Pacific Industries (SPI) is a third-generation family-owned company based in Anderson, California that employs over 6,000 employees nationwide and operates a combined 16 sawmills in California, Oregon, and Washington. These sawmills rely on timber that is generated on Federal Forests, including the Mt. Baker - Snoqualmie National Forest.

In general, SPI supports the North Fork Stillaguamish Landscape Analysis and offers the following comments;

## ***Purpose and Need***

More emphasis should be placed on contributing to the local and regional economies through timber production. The Scoping letter states, "*Landscape restoration actions have the **potential** [emphasis added] to contribute to the local and regional economies by providing timber....*". Timber Management Emphasis land-use allocations are located within the project area and have potential project stands mapped within them. Not only should timber extraction be maximized within this land-use allocation, but within all other land-use allocations as well, given that it is used as a tool to meet management objectives. Any merchantable timber removed from the project area **will and shall** contribute to the local and regional economies. The world demands wood products in many different forms and this project should contribute to that.

## ***Proposed Forest Plan Amendment***

SPI supports the proposed plan amendment for the MA19, Mountain Hemlock Zone. Stand improvement thinning should be used as a tool across the MA19 to restore huckleberry habitat. However, such treatments should be carefully analyzed to ensure economic viability. In order to accomplish this, commercial thinning should be the emphasis.

## ***Condition-Based Management***

Condition-based management has been utilized on other forests within Region 6 and should be utilized on this project as well. SPI supports this management approach because it provides flexibility in an ever-changing landscape.

### ***Terrestrial Restoration***

SPI supports management of stands, regardless of age and tree diameter, in order to meet stand and landscape objectives. Gaps and heavy thinning should be maximized and should occur on no less than 10% of the treatment area. When thinning from below, the intent should include increasing the rate at which a particular stand will meet the desired future condition. Strictly thinning from below to provide sunlight into the understory may not meet the desired management objective. It is possible that increased sunlight to the forest floor is simply a byproduct of thinning from below. SPI supports variable retention harvests (VRH) and recommends that the forest **shall consider** them rather than, “... *variable retention harvest, would be considered*”, especially within the Timber Emphasis land-use allocation area. In addition to “*create openings suitable for ungulate and deer foraging opportunities and to provide pollinator habitat*”, the intent of VRH should be to provide timber to local sawmills, contribute to the economy, as well as provide a funding source for the implementation of other projects within the project area.

SPI cautions the forest about adjusting existing LSR boundaries to include non-LSR areas in exchange for management of LSR acres. A cost-benefit analysis should be considered when evaluating this management decision as it could impact the economics of individual projects. For example, the exchange could lead to a longer haul route, increased road maintenance expenses, increased logging costs, decreased volume per acre removal, and/or decreased timber quality and value.

Thinning within riparian reserves is generally a good practice, but SPI encourages the forest to extract all merchantable timber that is felled within these areas and should occur adjacent to, and concurrently with, active harvest operations.

The forest should not limit harvest equipment or methods within the project area. SPI supports the use of all equipment systems, types, and methods including; skyline, ground-based, and tethered. They should be considered on both commercial thinning and VRH treatment types.

Currently, the forest is proposing 13,787 acres (22% of total project area) of commercial thinning across the project area, but no VRH acreage is disclosed. SPI strongly encourages the forest to consider and implement VRH where applicable and as much as possible, as well as maximize the number of acres that receive commercial treatment. This will be critical in order to provide funding to implement the 8,662 acres of non-commercial thinning.

### ***Transportation System***

SPI strongly encourages the forest to identify, analyze, and utilize rock sources that are located on forest service ownership, and adjacent landowners, that are within close proximity to stand treatment areas. Development of new sources, as well as expanding existing sources should be considered. Costs associated with obtaining rock from commercial sources has increased dramatically in recent months. Rock purchase and haul can be the most expensive part of project implementation and can be the reason why implementation fails. Another reason implementation fails is because costs associated with temporary roads does not always get appraised. SPI strongly encourages the forest to appraise all work associated with roads, whether a system road or not.

The forest should be cautious when decommissioning roads. All roads should be analyzed with a long-term focus and all potential uses. SPI recommends that the forest keep roads open to vehicle travel if it is determined they will be used for the following; future project implementation, future stand management, and/or firefighting access.

Currently, there are 13 proposed Aquatic Organism Passage (AOP) sites within the project area. SPI supports these projects, but it is likely that these projects will be a significant economic cost to implement. The forest should maximize economic return to the forest through the sale of timber in order to offset the costs associated with the AOP's. Otherwise, the forest may need to seek out other funding sources.

***Watershed Restoration***

SPI supports actions listed within this subsection of the Scoping letter, but provides caution in regards to "tree tipping". "Tree tipping" should be minimized and only incorporated into concurrent, adjacent commercial operations.

***Recreation Management***

SPI supports recreational use within a forested landscape as both recreation and harvest activities can coexist together. However, SPI is concerned that the forest is emphasizing recreation enhancement within the Timber Emphasis land-use allocation. The forest should ensure that it is maximizing commercially treated acres within this land-use allocation. Another concern is public safety. Harvest operations, including timber haul, will be occurring in the area proposed for increased recreational use and infrastructure. SPI encourages the forest to analyze and address potential safety issues that may arise from recreation/harvest activity interactions.

Thank you for the opportunity to provide Scoping comments on the North Fork Stillaguamish Analysis. I look forward to this project moving forward.

Sincerely,

A handwritten signature in blue ink that reads "Adam Ellsworth". The signature is fluid and cursive, with the first name "Adam" and last name "Ellsworth" clearly distinguishable.

Adam Ellsworth  
Log Procurement Manager  
Burlington Division  
Sierra Pacific Industries