



North Cascades Conservation Council
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Please accept these comments from the North Cascades Conservation Council (NCCC) for the draft environmental assessment of the North Fork Stillaguamish Landscape Analysis.

NCCC's perspective is that there are deeply troubling issues with the Collaborative Forest Landscape Restoration Act (CFLRA) of 2009, which is the impetus for this project. The CFLRA appears to work at cross purposes to the National Environmental Policy Act (NEPA) of 1969's mandate for public involvement. It allows a small, handpicked elite of private entities to surreptitiously develop major project proposals alongside the U.S. Forest Service for federal public lands, typically involving resource extraction, long before the rest of the interested public is allowed to become aware of the project and participate during the scoping period.

Moreover, private entities in these elite "collaboratives" are often directly funded by the National Forest Foundation and thus serve essentially as paid lackeys to the federal government, a situation which bears more than a whiff of corruption. At minimum, this arrangement is inequitable to the public at large. Yet this is how the proposed action came about for the North Fork Stillaguamish Landscape Analysis. Since a proposed action nearly always constitutes the basis for the eventual preferred/adopted alternative, is it not also subject to the NEPA process when developed by a collaborative, thus requiring full and open public involvement? Failing this, the proposed action represents a *de facto*, preemptive decision reached with exclusively selected publics behind closed doors which can only be superficially modified.

Page 14 of the draft environmental assessment (EA) for the North Fork Stillaguamish Landscape Analysis contemplates "tree tipping" with heavy equipment into channels and floodplains. How then does this heavy equipment reach these areas? Whether by carving a new path for said equipment through a Riparian Reserve or accessing the riparian zone from an intersecting system road or temporary road, please explain how this mechanized entry complies with Aquatic Conservation Strategy objectives of the Northwest Forest Plan.

Page 16 of the draft EA discusses REO review of cutting and removal of trees up to 26" dbh in Late Successional Reserve (LSR). The presence of such vigorous trees in stands less than 80

years of age is a prime indicator that the stand in question is developing along a desirable trajectory. Extraction of such trees contradicts the overarching goals of LSR zoning, and plainly suggests that the Forest Service's intent here is not to manage for old-growth characteristics, but for sawlog volume. Dropping and leaving certain trees greater than 20" dbh would allow the agency to both achieve its desired stand density index, while contributing to the supply of coarse woody debris (CWD) on the forest floor, which is both a core feature of old-growth forests and a characteristic for which these stands are currently lacking. Page 66 of the draft EA attempts to argue that dropping and leaving some of these larger trees would present safety concerns to timber operators, but the Northwest Forest Plan does not speak to the safety of logging outfits in LSR, which is explicitly not intended for "programmed timber harvest." If the Forest Service must forgo the inarguable benefit of increasing CWD in LSR because of purported physical risks to loggers, then clearly it should stay out of these units altogether.

Page 29 of the draft EA, in the notably minimalist climate change section, states that the planned thinning treatments will increase the forest's resilience to wildfire, though the EA elsewhere (e.g., page 53) concedes that the project will in fact increase wildfire risk. There is of course no scientific consensus, much less a common consensus, that thinning the west slope of the Cascades reduces the frequency or intensity of wildfire. On the contrary, commercial thinning allows the forest floor to become tinder dry much earlier in the summer, allows greater intrusion of wind to accelerate any initial ignitions, and of course creates a high number of travel corridors which encourage fire starts from ever-multiplying human visitors. It appears likely that these same ingredients produced the Bolt Creek fire in summer 2022. NCCC believes the Forest Service to be partly responsible for that anthropogenic blaze.

Sadly, the draft EA trots out the tired industry canard regarding carbon transferred to wood products as representing some sort of climate benefit. This is of course pure myth, as the agency well knows. In logging rapidly maturing trees, future carbon storage that would have otherwise occurred is lost and, by turn, wood products have much shorter lifespans than Northwest conifers. We see, as well, that this project's Climate Change Impacts Analysis includes not a single reference from within the past eight years. In NCCC's scoping comments for this project, we provided the following information. Why did the Forest Service see no reason to also consider the peer-reviewed research we highlighted? We stated:

Harris et al's "Attribution of net carbon change by disturbance type across forest lands of the conterminous United States" in Carbon Balance and Management (2016) concluded that logging in the United States releases five times the CO2 as wildfire, bark beetles, windthrow, land use conservation, and drought combined. Oregon State University's Beverly Law's research, published by the National Academy of Sciences in 2018, showed that 35% of the carbon emissions in Oregon result from the wood products sector. Moreover, OSU's Polly Buotte and colleagues in Ecological Applications (2019) found that wetter western forests, including the MBSNF, have the potential to sequester up to six years of current fossil fuel emissions in the region if left unlogged.

Page 40 of the draft EA states that increases in open road density during project implementation would persist for up to five years. Moreover, page 67 anticipates future commercial entry, with the implication that decommissioned "temporary" roads will be used repeatedly in the future. How does this comply with the Northwest Forest Plan's prohibition on net increase of open road density within Key Watersheds (S&G C-7), such as the North Fork Stillaguamish basin? Nowhere in the Northwest Forest Plan is there mention that the Forest Service may temporarily increase open road density in Key Watersheds for commercial thinning projects. It would seem then that construction of temporary roads must be offset by full closure of existing system roads for the life of those temporary roads, in order to comply with the Plan's concrete protections for Key Watersheds. NCCC expects specifics in the final EA regarding how this compliance will be achieved, communicated, and documented.

Tables 6 and 13 of the draft EA, involving road maintenance levels post-project, are contradictory and confusing, as has already been communicated to the Forest Service informally. Please correct or clarify these. Additionally, the EA does not describe the specific differences on the ground between ML-1 closure and decommissioned roads. We are curious as to whether the treatments are largely the same, with the obvious difference being that ML-1 roads remain part of the system. For the crucial, dual purposes of water quality and natural movement of wildlife (while reducing poaching), NCCC strongly advocates for maximization of system road reduction and closure as detailed in our scoping comments, preferably through permanent decommissioning, by the conclusion of this project. Specifically also, we wish to highlight FSR 1820, which crosses Deer Creek and proceeds up the Higgins Creek valley. FSR 1820 is a regrettable cherrystem, penetrating deeply into and degrading the 13,000-acre Higgins Mountain Inventoried Roadless Area. Given the rarity of significant roadless acreage in the Finney Block, particularly where it drains to the North Fork Stillaguamish River, we urge that FSR 1820 be decommissioned from its junction with FSR 18.

Finally, we call your attention to significant concerns recently communicated by the Environmental Protection Agency (EPA) toward condition-based management (CBM), which the draft EA for this project intends for application to management activities in Riparian Reserves and dispersed camping areas. EPA has concluded, based on review of comparable projects on the Dixie National Forest and Custer Gallatin National Forest, that the Forest Service's CBM approach conflicts with sound NEPA guidance and risks serious inter-agency conflict. The Council on Environmental Quality has additionally been made aware of this ongoing concern. NCCC asserts that all CBM-related intents and purposes on the Mount Baker-Snoqualmie National Forest should be permanently discontinued.



Jim Scarborough, Board of Directors
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