



February 2, 2024

Ms. Jacque Buchanan, Regional Forester  
Pacific Northwest Region  
United States Forest Service  
1220 SW 3rd Avenue  
Portland, OR. 97204

**RE: Forest Service Notice of Intent to Amend the Northwest Forest Plan**

Dear Ms. Buchanan:

As members of the Darrington Collaborative, we are writing to provide comments on the U.S. Forest Service's Notice of Intent to Amend the Northwest Forest Plan released on December 18, 2023.<sup>1</sup> We appreciate the Forest Service's recognition of the important ecological, economic and social benefits national forests provide to all of us. We also appreciate the acknowledgement of the new information and lessons learned over the last 30 years of Northwest Forest Plan implementation and the agency's commitment to updating the Plan to better incorporate new science and serve rural and Indigenous communities.

**Background on the Darrington Collaborative**

The Darrington Collaborative was established on July 10, 2015, as a partnership between leaders from major conservation organizations, local timber industry, local STEM education programs, and the community of Darrington. The goal of the group is to bring together a variety of interests, especially those of the local timber industry and the conservation community, to increase ecologically sustainable timber harvests near Darrington and create jobs, while also improving and restoring the health of forests and watersheds in the area, including funding high priority aquatic restoration projects. The Collaborative is keenly focused on the Darrington area and the Darrington Ranger District but has engaged in projects throughout the Mt. Baker-Snoqualmie National Forest (MBS).

The partnership grew out of the tragic Oso slide on March 22, 2014 which killed 43 people, destroyed homes, damaged public infrastructure including a main highway, and blocked the Stillaguamish River, causing significant environmental and economic damage. Conservation and recreation organizations worked with local community leaders to highlight and promote the incredible outdoor recreation opportunities near the scenic town of Darrington and support the establishment of local STEM education efforts that have evolved into the creation of the Glacier Peak Institute. As trust developed

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<sup>1</sup> Region 5 and Region 6; California, Oregon, and Washington; Forest Plan Amendment for Planning and Management of Northwest Forests Within the Range of the Northern Spotted Owl, 88 Fed. Reg. 87393, December 18, 2023, <<https://www.govinfo.gov/content/pkg/FR-2023-12-18/pdf/2023-27742.pdf>>.

between the forementioned organizations following the devastating Oso Slide, it eventually led to the establishment of the Darrington Collaborative.

Over the past nine years, the Darrington Collaborative has worked with the Mt. Baker - Snoqualmie National Forest to provide external funding, man-hours, expertise, and value-added capacity to one stewardship sale and a Good Neighbor Authority sale which included aquatic restoration projects (Segelsen 1 and Segelsen 2); assistance on sale preparation, road inventories, stand exams, and legacy stream data analysis on the Snoquera, Nooksack, South Fork Stillaguamish, and North Fork Stillaguamish landscapes; and support in the development of the North Fork Stillaguamish Vegetation Management Environmental Assessment.

### **Impacts of the 1994 Northwest Forest Plan to Darrington**

As the Notice of Intent states, "The development and implementation of the NWFP has had significant socio-economic, cultural, workforce, and financial impacts on communities and publics."<sup>2</sup> The Plan has consistently fallen short of its timber production goal of 1.2 billion board feet annually,<sup>3</sup> which was its primary criteria for supporting economies and community wellbeing. The amount of timber volume cut and sold declined precipitously in the early 1990s.<sup>4</sup> Furthermore, the Plan's promised support for rural communities to aid the economic transition away from old-growth logging was short-lived.<sup>5</sup> For example, due to a variety of factors, including chronic underfunding and staffing declines at the Forest Service,<sup>6</sup> the restoration thinning treatments of second-growth stands allowed under the NWFP have fallen far short of expectations and need. This has added to the hardship and economic struggles of small timber-dependent communities, made those transitions harder, and amplified their impact.

Darrington has acutely felt these impacts. Today, it is the poorest community in Snohomish County.<sup>7</sup> The number of locally-based Forest Service staff has dropped by 75% since the early 1990s.<sup>8</sup> Median household income has not kept pace with neighboring communities. In 2022, the median household

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<sup>2</sup> At Pg. 12, Region 5 and Region 6; California, Oregon, and Washington; Forest Plan Amendment for Planning and Management of Northwest Forests Within the Range of the Northern Spotted Owl, 88 Fed. Reg. 87393, December 18, 2023, <<https://www.govinfo.gov/content/pkg/FR-2023-12-18/pdf/2023-27742.pdf>>

<sup>3</sup> At Page 13, Bioregional Assessment of Northwest Forests, July 2020, USDA Forest Service, <[https://www.fs.usda.gov/Internet/FSE\\_DOCUMENTS/fseprd762774.pdf](https://www.fs.usda.gov/Internet/FSE_DOCUMENTS/fseprd762774.pdf)>

<sup>4</sup> At Pg. 634, Figure 8.3, Charnley et al. 2018. Chapter 8: Socioeconomic Well-Being and Forest Management in Northwest Forest Plan Area Communities. In *Synthesis of science to inform land management within the Northwest Forest Plan Area*. Gen. Tech. Rep. PNW-GTR-966. Portland, OR: U.S. Department of Agriculture, Forest Service, Pacific Northwest Research Station. 1020 p. 3 vol., <<https://www.fs.usda.gov/research/treearch/56278>>.

<sup>5</sup> Gorte, R.W., "The Clinton Administration's Forest Plan for the Pacific Northwest," report 93-664 ENR, 16 July 1993, Major Studies and Issue Briefs of the Congressional Research Service, 1993 supplement, microfilm reel 13, frame 130,

<<https://www.washington.edu/uwired/outreach/cspn/Website/Classroom%20Materials/Curriculum%20Packets/Evergren%20State/Documents/document%2055.html>>.

<sup>6</sup> <https://www.nafsr.org/advocacy/2019/072619%20Workforce%20Capacity%20Study.pdf>

<sup>7</sup> Census.gov data shows that in 2022, [Darrington had a poverty rate of 18.8%](#) while Snohomish county as a whole had a [poverty rate of 8.6%](#).

<sup>8</sup> Personal Conversations with retired Darrington Ranger District personnel from Oak Rankin, personal communication.

income for Darrington was half that of Snohomish County as a whole.<sup>9</sup> Programs intended to stabilize funds available to rural communities, such as Secure Rural Schools, have not made up for lost federal timber revenue. In 2017, the last year for which data are available, Darrington received a mere \$900,<sup>10</sup> or \$2 per student,<sup>11</sup> in Secure Rural Schools funding.

While the Plan has essentially eliminated the logging of old-growth forests on federal forestland,<sup>12</sup> much opportunity remains to use timber harvest as a restoration tool to meet ecological objectives and support socioeconomic goals in local communities. Restoration projects are important for a variety of reasons, the most pressing of which is preventing catastrophic wildfire and subsequent loss of habitat, community, or life. Region residents are threatened by increasingly frequent and severe wildfire events and flooding.<sup>13,14</sup> There is also a need to maintain and improve critical wildlife habitat, restore hydrologic function and soil productivity, and maintain access roads for recreation and administration as well as wildfire suppression and evacuation. Yet, commercial harvest activities associated with many of the Region's proposed projects take place on minimal acreage and, therefore, have limited benefits to support non-harvest related needs.

Indeed, the very existence of our Collaborative is a recognition by all participants that a) more restoration work can and needs to be done under the NWFP than current agency capacity allows, and b) while diminished compared to historical levels, active forest management remains a necessary and essential leg of the economic stool for small rural economies like Darrington, one that cannot be easily replaced, even as Darrington adds other sectors to its economy. Therefore, it is vital that these factors are taken into account when amending the Plan to ensure it promotes the vitality of rural communities like Darrington.

### **Need to Change & Proposed Action**

Much has changed in our forests and communities since the Northwest Forest Plan was developed. The Plan amendment process creates an opportunity for the Forest Service to modernize how forests are managed across the region and to ensure the updated Plan more effectively serves the needs of forested rural communities like Darrington. To that end, we offer the following comments for your consideration as this planning process moves forward:

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<sup>9</sup> Median household income for Darrington was [\\$21,700 in 1990](#) and [\\$49,000 in 2022](#), compared to [\\$36,800 in 1990](#) and [\\$101,500 in 2022](#) for Snohomish County as a whole.

<sup>10</sup> [https://ospi.k12.wa.us/sites/default/files/2022-12/fedfor\\_srs\\_updated\\_1718.pdf](https://ospi.k12.wa.us/sites/default/files/2022-12/fedfor_srs_updated_1718.pdf)

<sup>11</sup> Darrington School District enrollment in the 2017-2018 school year was 439 students - [317 at the elementary school](#) and [122 at the high school](#).

<sup>12</sup> At Page 42, Bioregional Assessment of Northwest Forests, July 2020, USDA Forest Service, <[https://www.fs.usda.gov/Internet/FSE\\_DOCUMENTS/fseprd762774.pdf](https://www.fs.usda.gov/Internet/FSE_DOCUMENTS/fseprd762774.pdf)>.

<sup>13</sup> Morgan, H.A., Bagley, A., McGill, L., Raymond, C.L. 2019. [Managing Washington Wildfire Risk in a Changing Climate](#). Workshop summary report prepared by the Northwest Climate Adaptation Science Center and the Climate Impacts Group, University of Washington, Seattle.

<sup>14</sup> Mauger, G.S., J. Robinson, R.J. Mitchell, J. Won, and N. Cristea (2021). Climate Change & Flooding in Snohomish County: New Dynamically-Downscaled Hydrologic Model Projections. Report prepared for Snohomish County. Climate Impacts Group, University of Washington, <<https://doi.org/10.6069/SQJ2-DF62>>.

### *Rural Communities*

As noted above, the Northwest Forest Plan has had a significant impact on rural communities. In updating the NWFP, the agency has a responsibility to these communities to contribute to their social and economic sustainability.<sup>15</sup> The Plan must improve the predictability of timber and non-timber products from national forests and ensure that local communities benefit from active forest management. It can do this by directing the agency to prioritize the use of local contractors, requiring Forest Service employees to be based in the communities in which they work, and supporting local workforce training so people don't have to leave their home communities to find work. The amendment should also include plan components that hold the agency accountable to the Plan's stated intentions with respect to supporting rural forest-dependent communities.

### *Fire Resistance and Resilience*

Wildfire risk has dramatically increased in the past several decades and now threatens rural communities, water quality, forest health, and wildlife habitat in Western Washington.<sup>16</sup> Consequently, we support changes to the NWFP that prioritize the need for concerted wildfire risk reduction activities near communities and in forest stands that are overstocked and fire suppressed. The use of prescribed fire after mechanical treatment should also be emphasized, as fire increases the availability of key nutrients in the soil.<sup>17</sup> Similarly, the Forest Service should develop plan components that encourage cultural burning for treaty resource stewardship, recognizing that prescribed burning and cultural burning are separate and distinct management approaches. Finally, the plan should recognize the characteristics of different tree species and their varying responses to climate and fire, as well as their suitability for contributions to habitat in riparian areas.

### *Climate Change*

Climate change was not well understood or considered when the NWFP was first developed. Today, communities like Darrington are living with the impacts of climate change, including increased drought, wildfire, smoke, flooding, and extreme heat. The Forest Service has the opportunity now to update the NWFP to help forests adapt to and mitigate the worst impacts of climate change. Consequently, the NWFP amendment should incorporate adaptation strategies and climate-focused planning to mitigate these impacts and build resilience in the face of ongoing climate change.

### *Mature and Old Growth Ecosystems*

The conservation of mature and old-growth forests was a driver behind the development of the NWFP and the creation of the late successional reserve network. While logging of old-growth has ceased on national forestland west of the Cascades in Washington State, there remains much debate about whether, where, and how much mature forests should be available for timber harvest. While individual

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<sup>15</sup> 36 CFR 219.8(b)

<sup>16</sup> Morgan, H.A., Bagley, A., McGill, L., Raymond, C.L. 2019. Managing Washington Wildfire Risk in a Changing Climate. Workshop summary report prepared by the Northwest Climate Adaptation Science Center and the Climate Impacts Group, University of Washington, Seattle, <<https://cig.uw.edu/publications/managing-western-washington-wildfire-risk-in-a-changing-climate/>>.

<sup>17</sup> Hungerford, R.D. et al. 1990, Influence of fire on factors that affect site productivity, Paper presented at the Symposium on Management and Productivity of Western-Montane Forest Soils, Boise, ID, April 10-12, 1990, <[https://forest.moscowfsl.wsu.edu/smp/solo/documents/GTRs/INT\\_280/Hungerford\\_INT-280.php](https://forest.moscowfsl.wsu.edu/smp/solo/documents/GTRs/INT_280/Hungerford_INT-280.php)>.

member organizations within the Collaborative may hold differing views on how extensive the management of mature forests should be, we all agree that at least some active management of some mature forest in moist coniferous forest stands consistent with the current standards and guidelines of the Northwest Forest Plan is appropriate to sustainably manage national forests and is supported by the best available science. For example, management of second-growth plantations in Adaptive Management Areas, Matrix, and Late Successional Reserves less than 80 years old provide important opportunities to improve and restore forest health, resilience, wildlife habitat, and ecological services.

Therefore, with respect to management of these second growth plantations in current Adaptive Management Areas, Matrix, or current Late Successional Reserves under 80 years old, we encourage the Forest Service to update the NWFP in a way that promotes the development of future old-growth forest structural features, and restores biological diversity, and mitigates wildfire loss through activities like restoration thinning, while simultaneously supporting rural forest-dependent economies, consistent with the agency's multiple use mandate.

#### *Tribal Inclusion*

Tribes play an important role in the Pacific Northwest and have done so since time immemorial. We recognize the value of their voice and Traditional Ecological Knowledge on forested landscapes within the purview of the Northwest Forest Plan. Treaty rights and cultural practices predate most laws pertaining to Forest Service activities. The Forest Service did not consult with Tribes when developing the NWFP. In updating the Plan, the agency must correct this failure by meaningfully engaging with Tribes to meet its treaty and trust responsibilities. The updated Plan should respect Tribal Treaty rights and lifeways, including but not limited to hunting and fishing, gathering, ceremonial practices, and cultural sites. Programmatic direction for Tribal cultural practices should also be included.

#### **Other Considerations**

While not specifically discussed in the Notice of Intent, we urge the Forest Service to retain the Aquatic Conservation Strategy and the existing approach to Riparian Reserves in the updated Plan. The combination of no-harvest inner-zone buffers with outer-zone buffers in which some management is allowed to meet Aquatic Conservation Strategy objectives has been successful and provides the flexibility needed to manage myriad different local conditions found across the 24-million-acre region.<sup>18</sup> We would oppose any proposed increase in no-harvest riparian buffers.

#### **Conclusion**

Thank you for the opportunity to provide comments on this important process. We look forward to working with you to ensure the updated Northwest Forest Plan benefits our forests and communities.

Sincerely,

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<sup>18</sup> At Page B-123, Appendix B6, Aquatic Conservation Strategy, Final Supplemental Environmental Impact Statement on the management of habitat for late-successional and old-growth forest related species within the range of the northern spotted owl, USDA Forest Service and Bureau of Land Management, February 1994, <<https://www.fs.usda.gov/r6/reo/library/downloads/documents/NWFP-FSEIS-1994-II.pdf>>.

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