



File Code: 1950; 1560
Date:

Ryan Talbott
Wild Earth Guardians
P.O. Box 40490
Portland, OR 97240

Dear Mr. Talbott and Mr. Parks:

Thank you for your May 2, 2024 letter regarding the North Fork Stillaguamish Landscape Analysis Project on the Mt. Baker-Snoqualmie National Forest. In your letter you expressed concern that the project must adhere to recent old growth forest direction issued by Chris French, Deputy Chief of the National Forest System. On December 18, 2023, the Deputy Chief sent a letter to all Regional Foresters requiring projects proposing vegetation management activities that will occur where old growth forest conditions (based on regional old-growth definitions) exist on National Forest System lands to be submitted to him for review and approval.

On April 5, 2024, I sent a letter to all Pacific Northwest Region Forest Supervisors, Deputy Forest Supervisors, and District Rangers with the requirements for project-level old growth review and approval process requirements for National Forest System units in Oregon and Washington. For each project, units are required to demonstrate whether vegetation management activities will occur where old growth forest conditions exist and how they made that determination. All projects signed after the December 2023 letter will be reviewed locally to determine if they qualify for review by the National Forest System Deputy Chief.

Details available on the [North Fork Stillaguamish Landscape Analysis project website](#), accessible from the Mt. Baker-Snoqualmie Forest website under the *Projects* link in the *Managing the Land* section, explain that no vegetation management is proposed where old growth forest conditions exist. The draft decision includes variable density thinning (up to 8,842 acres, including 1,275 acres of riparian reserve variable density thinning) to enhance the development of late-successional and old growth forest habitats, improve spotted owl and marbled murrelet nesting habitat, increase forest biological complexity and resiliency, maintain unique habitats, and support tribally reserved treaty rights and the resources upon which they depend. Variable density thinning is a treatment designed to expedite development of structural characteristics that will improve late successional and old growth habitat. This type of treatment promotes rapid growth of individual trees by reducing competition for light and water.

The plantations where treatments are proposed were created within previously clear-cut old growth patches, and there is modeled remnant old growth structure in some of the proposed stands. No treatments proposed would be applied to any remnant old growth structure; however, because not all modeled areas throughout the project have been field verified, the North Fork Stillaguamish Landscape Analysis project will be submitted for review by the Deputy Chief for approval.



Additionally, in your letter you expressed concerns about “unstable” and “very unstable” soils throughout the project area and “likely to adversely affect” determinations for some fish species.

Forest personnel have designed the project to include measures that limit activities in areas where slope stability is of concern. They are also working with state partners to field verify potential treatment areas to mitigate any potentially unstable slope risks.

Consultation has been initiated with US Fish and Wildlife Service (FWS), and National Oceanic Atmospheric Administration National Marine Fisheries Service (NMFS), as required under section 7 of the Endangered Species Act (ESA). The effects determination “May Affect, Likely to Adversely Affect” for all listed fish species within the project area is due to the short term, adverse impacts from the actions. Through the consultation process, NMFS and USFWS will help determine the effects to ESA listed fish species so that the project does not put species in jeopardy. The Forest Service will not sign a final decision regarding the North Fork Stillaguamish Landscape Analysis project until ESA consultation is complete.

Again, thank you for your letter and for your interest in our National Forest System lands. If you have further questions, please contact Jackie Groce, Director of Resource Planning and Monitoring, at Jacqueline.Groce@usda.gov.

Sincerely,

JACQUELINE A. BUCHANAN
Regional Forester

cc: Jody Weil, Jackie Groce, Chris French