



May 23, 2022

Greta Smith, District Ranger
Darrington Ranger District
Mt. Baker-Snoqualmie National Forest
2930 Wetmore Ave., Suite 3A
Everett, WA 98201

<https://www.fs.usda.gov/project/?project=61659>.

Dear District Ranger Smith:

The Wilderness Society (TWS) appreciates the opportunity to comment on the scoping notice and proposed action for the North Fork Stillaguamish Analysis Project in the Darrington Ranger District of the Mount Baker-Snoqualmie National Forest. In addition to submitting these comments, we wholeheartedly endorse the detailed comments submitted by the Darrington Collaborative, of which TWS is a member.

TWS is interested in the 61,692-acre North Fork Stillaguamish planning area for several reasons. First, it is a significant part of the North Cascades ecoregion, which TWS has selected as a national priority landscape. Second, it contains large amounts of carbon-rich mature and old-growth forests, as well as degraded aquatic habitat for at-risk species such as Pacific salmon, steelhead, and bull trout. Third, the area's management is governed by the Northwest Forest Plan, with most of the area uniquely designated as both an Adaptive Management Area and a Late Successional Reserve. Finally, the project provides an opportunity to advance the goal of the Darrington Collaborative to increase ecologically sustainable timber harvests and create jobs in the Darrington region, while improving and restoring more healthy and resilient forests and watersheds.

Executive Order on Forests

President Biden recently highlighted the importance of mature and old-growth forests -- such as those in the North Fork Stillaguamish -- by signing Executive Order 14072 in Seattle on Earth Day. Noting the irreplaceable role that forests play in absorbing and storing carbon dioxide emitted by human activities, the E.O. states, "Conserving old-growth and mature forests on Federal lands while supporting and advancing climate-smart forestry and sustainable forest products is critical to protecting these and other ecosystem services provided by these forests." Furthermore, the E.O. states:

It is the policy of my Administration, in consultation with State, local, Tribal, and territorial governments, as well as the private sector, nonprofit organizations, labor unions, and the scientific community, to pursue science-based, sustainable forest and land management; conserve America's mature and old-growth forests on Federal lands; invest in forest health and restoration; support indigenous traditional ecological knowledge and cultural and subsistence practices; honor



Tribal treaty rights; and deploy climate-smart forestry practices and other nature-based solutions to improve the resilience of our lands, waters, wildlife, and communities in the face of increasing disturbances and chronic stress arising from climate impacts. It is also the policy of my Administration, as outlined in *Conserving and Restoring America the Beautiful*, to support collaborative, locally led conservation solutions.

We encourage you to apply this policy direction in E.O. 14072 to the North Fork Stillaguamish project.

Roads and Watershed Integrity

TWS is concerned about the impaired watershed conditions in the project area and about the potential cumulative impacts of existing and proposed logging roads on water quality and habitat for imperiled fish. The scoping notice states that old logging roads “are the primary sources impeding water quality and fisheries habitat function in the project area,” but it does not specifically identify any roads for decommissioning or other remediation work. To the contrary, the proposed action estimates that 25 miles of temporary road construction and another 25 miles of non-system/unauthorized roads will be needed for log hauling and rehabilitated afterwards. We urge you to carefully evaluate the impacts of road building on the aquatic resources in the project area and to include extensive road remediation activities that will improve watershed integrity.

Stewardship Contracting

TWS strongly supports the use of stewardship contracting to achieve land management goals that meet local and community needs. Stewardship contracting goals that are particularly relevant to the project area include:

- Road and trail maintenance or obliteration to restore or maintain water quality
- Removing vegetation or other activities to promote healthy forest stands
- Watershed restoration and maintenance
- Restoration and maintenance of wildlife and fish

We look forward to working with others in the Darrington Collaborative in the stewardship contracting process, including multi-party monitoring and evaluation, for the North Fork Stillaguamish project.

Adaptive Management

Consistent with the Northwest Forest Plan, we urge you to develop and test alternative approaches applicable to the North Fork Stillaguamish project. The Plan’s management emphasis for the Finney Adaptive Management Area is “restoration of late-successional and riparian habitat components.” We are particularly interested in learning more about the restorative effects of alternative thinning treatments in the North Cascades Ecoregion,



including effects on long-term carbon sequestration and the development of resilient mature and old-growth forest conditions.

Thank you for considering TWS's comments. We look forward to collaborating with the Forest Service in planning and implementing this project.

Sincerely,

Megan Birzell
Washington State Director