



**Skagit Audubon Society**

**P.O. Box 1101**

**Mount Vernon, WA 98273**

March 15, 2023

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

Dear Ranger Smith,

We are writing on behalf of Skagit Audubon Society to comment on the draft *Environmental Assessment (EA) for the North Fork Stillaguamish Landscape Analysis* project.

Skagit Audubon Society's 474 members live in or near Skagit County. As the local chapter of the National Audubon Society, we share a purpose of conserving and restoring natural ecosystems, focusing on birds, other wildlife, and their habitats for the benefit of humanity and the earth's biological diversity. The lands comprising Mount Baker-Snoqualmie National Forest are important to us as wildlife habitat for such declining species as the Northern Spotted Owl and Marbled Murrelet and as places we frequently hike, camp, backpack, and bird. Our chapter board and general membership represent a wide variety of professional and avocational backgrounds; among them, forest, wildlife, and public lands management. Our comments are separate from those of Pilchuck Audubon Society.

We appreciate the expertise and extensive work which have gone into the preparation of the draft EA and offer the following comments for your consideration.

1. To comply with the purpose of the Finney Adaptive Management Area, there should be a plan for monitoring the effectiveness of variable density thinning at accelerating the development of old growth habitat conditions.

The project area of the North Fork Stillaguamish Landscape Analysis is entirely within the Finney Adaptive Management Area (AMA) designated under the 1994 Northwest Forest Plan amendment. Adaptive Management Areas under the Northwest Forest Plan are designated for "experimental forestry." The management emphasis the Northwest Forest Plan established for this particular AMA is exploring techniques for restoring late successional and riparian habitat components, particularly those meeting the habitat requirements of the Northern Spotted Owl and the Marbled Murrelet. Skagit Audubon's interest in the effectiveness of such techniques as variable density thinning<sup>1</sup> dates to our chapter's submission of comments during the scoping and environmental assessment review phases of the *Finney AMA Project*, for which the Decision Notice was issued in May 2013. During that review we stressed the importance of a monitoring program adequate to evaluate the success of the experimental thinning at accelerating the development of old growth habitat characteristics.

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<sup>1</sup> Described in the EA at pages 10 and 11.

We note that in the EA under consideration the only mention of monitoring is on page 67 in the discussion of what would be done if natural regeneration does not occur in the gaps which variable density thinning creates. To fulfill the purpose of the Finney AMA in developing techniques applicable to other impaired forests in the Northwest it would seem essential to have a robust monitoring program.

We have some familiarity with the avian monitoring done in the South Fork Stillaguamish watershed using focal species to evaluate habitat attributes. This could be useful for the North Fork project as well, though the major emphasis of monitoring needs to be on evaluating the development of habitat characteristics particularly supporting the Northern Spotted Owl and Marbled Murrelet.

2. There should also be monitoring of the thinning treatments in relation to carbon sequestration. Given the urgency of the climate crisis and the important role of forests in sequestering carbon, it is important to learn whether techniques proposed for the project area such as variable density thinning result over time in more or less carbon sequestration than would occur without thinning the dense, even-aged stands.
3. Adverse impacts to such species as the Northern Spotted Owl and the Marbled Murrelet should not be dismissed as insignificant simply because the project area is a small fraction of the total potential habitat for these species.

At several points the EA dismisses adverse effects to Endangered Species Act (ESA) listed species as insignificant because the relevant habitat acres in the project area are a small fraction of such habitat across the ranges of the species. This type of statement ignores the fact that management projects with adverse effects can happen and are happening multiple other places within the ranges of the listed species. We need to view what happens in the project area as part of the cumulative adverse effect of all of these projects whether on Forest Service lands, Department of Natural Resources lands, or elsewhere. We note that the EA precedes completion of analysis by the U.S. Fish & Wildlife Service, which we hope would evaluate the EA from this broad geographic perspective.

4. The very significant role roads have played in generating the high number of landslides in the project area argues strongly for decommissioning as many roads as possible.

The statistics on land slides in the Stillaguamish drainage present a dramatic picture<sup>2</sup>:

- “1,080 landslides were inventoried within the entire Stillaguamish basin.
- “58% of this total (approximately 626) occurred within the North Fork Stillaguamish watershed.
- “Approximately 519 of these slides were considered to have delivered sediment to an adjacent stream channel.
- “Within the entire basin (North and South forks), the inventories estimated that approximately 75% of the total number of slides were associated with human disturbance (52% from roads and 22% from clearcuts)” (*our emphasis*)

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<sup>2</sup> EA, page 58

The high number of slides associated with roads and the consequent destruction of terrestrial habitat and degradation of riparian areas and streams through sedimentation should dictate decommissioning as many road miles as possible. There should be no new roads except when there is a very compelling need for them consistent with law and policy and only in areas with minimal risk of slope destabilization. We note the statement on EA page 60: “Areas that have been identified as unstable would not have treatments, however temporary roads may cross over areas of concern.” At a minimum, we favor the approach of EA Alternative 3, which would decommission roads that under Alternative 2 would be put in storage. Building new roads, however temporary, across unstable slopes is clearly unacceptable and flies in the face of what should be lessons learned from earlier practices in this watershed. As the EA states, “A significant proportion of logging related mass wasting events originate from roads.”<sup>3</sup>

According to the scientists of the Skagit Climate Science Consortium<sup>4</sup>, the consensus of climate models is that climate change will bring more intense, heavy rain events to the Skagit watershed. This will no doubt be true for the North Fork Stillaguamish also and will contribute to the frequency and scale of landslides, making it all the more important to eliminate roads on unstable slopes.

5. No roads or timber harvest are proposed for inventoried roadless areas.

We were pleased to read in the draft EA that, “No road construction or timber harvesting are proposed within any IRA (inventoried roadless area) as part of this project.”<sup>5</sup>

6. Increasing edge degrades habitat for the Northern Spotted Owl and Marbled Murrelet and exposes them to predation by corvids.

The EA and the background report on wildlife acknowledge that variable density thinning will increase the amount of edge and that this presents an adverse effect on these two ESA listed species.<sup>6</sup> It is also of concern that the thinning will reduce canopy cover to 40% when the norm for Spotted Owl habitat is at least 60%. (“Canopy closures in spotted owl habitat generally exceed 60 percent.”)<sup>7</sup> We infer the idea is that this is an acceptable trade-off for the accelerated development of what will eventually be more old-growth habitat for these species. This being an important assumption in the rationale for variable density thinning, we once again stress the importance of a robust monitoring program, in this case to evaluate the effects of increased edge and reduced canopy closure on the protected species in the project area.

Monitoring should also evaluate the effect that variable density thinning has on the presence of the Barred Owl. Does it expand the habitat attractive to this species whose presence is a major factor in the precipitous decline of the Spotted Owl population?

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<sup>3</sup> EA, page 62

<sup>4</sup> <http://www.skagitclimatescience.org/>

<sup>5</sup> North Fork Stillaguamish Landscape Analysis Draft Environmental Assessment, February 2023, p.4

<sup>6</sup> EA, page 74

<sup>7</sup> Mount Baker-Snoqualmie National Forest Draft Wildlife Background Information Report for the NF Stillaguamish Landscape Analysis Project Phyllis Reed February 2023, page 22

7. Because of predation by corvids, proximity of dispersed camps to Marbled Murrelet habitat should be a consideration in retaining or moving the camps.

It is well documented that corvids prey on Marbled Murrelet eggs and nestlings.<sup>8</sup> Camping attracts corvids. Dispersed camps near Marbled Murrelet habitat should be closed, and relocated camps should be in areas distant from this habitat. Please include this consideration in the EA's discussion of dispersed camping sites on page 15.

8. Whatever the final decision on managing the project area, it will be important to conduct an ongoing public education effort using signage, leaflets, web posts, social media, etc.

This will be particularly important where the Forest Service changes the location of camping and recreation areas. The public will need to know the importance of respecting the location and boundaries of camps, the need for keeping campsites clean of attractants to corvids and other wildlife, the goals of practices such as variable density thinning, and other aspects of the North Fork Stillaguamish project.

9. There needs to be strict adherence to seasonal noise restrictions near Spotted Owl and Marbled Murrelet habitat.

The EA acknowledges the potential for the noise of timber harvesting to disturb these ESA listed species. The document also refers to the development or expansion of existing quarries (for road building and maintenance?) termed "rock source development"<sup>9</sup>. Since quarrying will involve heavy equipment and blasting, the quarry locations must be distant from habitat for the protected species, and the noise must be restricted seasonally to avoid disturbance to ESA listed species.

10. The 150-foot riparian buffers under EA Alternative 3 are preferable to the smaller buffers proposed under Alternative 2.

Under Alternative 3, fish bearing and perennial non-fish bearing streams will have 150 foot no-thin buffers.<sup>10</sup> Under Alternative 2, buffers on these streams would be 50 or 100 foot with the decision being made at the time of forest treatment implementation using a condition-based management approach. This approach appears to circumvent the National Environmental Policy Act by, "... postponing site-specific analysis until the Forest Service implements the project, which effectively excludes the public from site-specific decisions, reduces transparency, and removes incentives for the agency to avoid harming localized resources."<sup>11</sup>

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<sup>8</sup> Mount Baker-Snoqualmie National Forest Draft Wildlife Background Information Report for the NF Stillaguamish Landscape Analysis Project Phyllis Reed February 2023

<sup>9</sup> EA, page 72

<sup>10</sup> EA, page 19

<sup>11</sup> [https://www.americanbar.org/groups/environment\\_energy\\_resources/publications/fr/20210510-the-us-forest-services-expanding-use-of-condition-based-management/](https://www.americanbar.org/groups/environment_energy_resources/publications/fr/20210510-the-us-forest-services-expanding-use-of-condition-based-management/)

*The U.S. Forest Service's Expanding Use of Condition-Based Management: Functional and Legal Problems from Short-Circuiting the Project-Planning and Environmental Impact Statement Process*, May 10, 2021, Andrew Cliburn, Paul Quackenbush, Madison Prokott, Jim Murphy, and Mason Overstreet

As the EA and background studies note, many streams in the project area exceed temperatures suitable for protected fish species.<sup>12</sup> Though a wider, no-cut buffer means a larger area not subject to thinning, it will decrease the angular insolation and thus be more effective at reducing stream temperatures in the near term. “While the canopy density directly overhead would not be affected, the angular canopy density would be reduced by the thinning treatments in riparian reserves adjacent to the buffers thus allowing for increased solar inputs to intermittent streams.”<sup>13</sup>

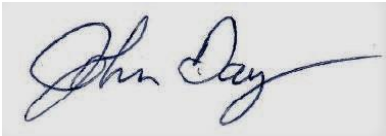
We were happy to see that the EA’s proposed application of condition-based management is reduced from the scoping announcement.

11. In areas being thinned, leave some of the larger logs on the ground.

Under Alternative 2 the EA proposes obtaining approval for cutting trees up to 26” dbh, exceeding the 20” dbh standard for Late Successional Reserve, which includes most of the project area.<sup>14</sup> The rationale is that there are even-aged stands with a high density of stems up to 26” dbh and that thinning is needed to open these stands to allow development of understory vegetation, create more varied habitat attractive to a greater variety of species, and accelerate development of old growth characteristics. Given that large woody debris on the forest floor is an important element of old growth habitat, we suggest that in areas lacking large woody debris from harvest years ago some of the larger trees felled should be left in place. This will also, at least to a small extent, ameliorate the removal of biomass involved in timber harvest. We acknowledge that adaptive management areas under the Northwest Forest Plan are charged with providing local social and economic benefits even while achieving ecological goals. Leaving any larger logs will reduce the economic value of the harvest but will honor the priority of restoring old-growth characteristics.

We appreciate the opportunity to offer these comments.

Sincerely,

A handwritten signature in black ink that reads "John Day". The signature is fluid and cursive, with a long horizontal stroke extending from the end of the name.

John Day  
President  
Skagit Audubon Society

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<sup>12</sup> EA, page 37

<sup>13</sup> EA, page 41

<sup>14</sup> EA, page 16