



March 15, 2023

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

RE: North Fork Stillaguamish Landscape Analysis Draft Environmental Assessment

Dear District Ranger Smith:

As members of the Darrington Collaborative, we are writing to provide comments on the North Fork Stillaguamish Landscape Analysis draft environmental assessment (Draft EA). We appreciate the Forest's efforts as part of this project to balance forest health, wildlife habitat and social and economic benefits to local communities consistent with the Northwest Forest Plan (NWFP). We support the overall purpose and need in the Draft EA and appreciate the opportunity to comment regarding the specific types of management and desired outcomes laid out in the document.

Thank you for the additional opportunities to engage the public around the North Fork Stillaguamish Landscape Analysis Project between the formal scoping notice and the Draft EA. The August 19, 2022 online public meeting and the August 25, 2022 field tour were a great and welcome opportunity to learn more about the development of the project and a great opportunity to give feedback. We appreciate the dozen or so Forest Service staff and specialists who attended the field tour.

Background on the Darrington Collaborative and Interest in the North Fork Stillaguamish

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 North Fork Stillaguamish landscape is of great interest to the Collaborative due to its proximity to the Darrington community and opportunities for forest restoration-thinning treatments that have the potential to improve future forest conditions. In fact, the first two pilot projects that the Collaborative worked on with the MBS were located within the planning area. Additionally, the Collaborative is interested in identifying and helping support restoration thinning, priority aquatic organism passage

(AOP), and other aquatic restoration projects on the North Fork Stillaguamish landscape moving forward.

Recognition of Changes in the Draft EA Based on Feedback from Scoping Comments

The Scoping notice left several important aspects of the North Fork Stillaguamish project unclear leading to uncertainty from readers and stakeholders. These concerns were laid out by the nearly 20 comment letters submitted by various stakeholders. Some of the issues that came up often in multiple comment letters included clarification about maintenance levels of Forest Service system roads, confusion about Adaptive Management Areas (AMA) and Late Successional Reserve (LSR) land allocations, concerns about recreational access, recognition of climate impacts and resiliency, agency discretion around adjustments to late successional reserve guidelines, proposed forest plan amendments, balance between timber emphasis, and management for late successional habitat.

The draft plan goes a long way toward clarifying and addressing many of the concerns raised during the scoping comment period (by several commenters, not just the Darrington Collaborative) including the following:

- Clearer Description of the differences between AMA with LSR emphasis and AMA Without LSR Emphasis – We appreciate that the Draft EA provides a clearer description of the two types of AMA allocations in the project area as explained on Pg 3 in Table 2. The table clearly indicates that all Adaptive Management Area Reserves (AMA-R) in the project area totaling 51,521 acres are also under the Late Successional Reserve (LSR) allocation under the NWFP. The table also makes clear that Adaptive Management Area Non-Reserve (AMA-NR) in the planning area, totaling 10,246 acres, were expected to be open to “some commercial timber harvest but with ecological objective” and do not include an LSR allocation.
- Clear articulation of Acres in the Planning Area vs. Acres Treated – We appreciate that on Pg. 3 Table 2 you indicate the acres in various land allocations within the planning area (61,849) and those acres that are being considered for treatment (19,169), about one third of the project area. This is important information to highlight.
- Clear Indication of What Treatments or Activities Would Occur in Roadless Areas – This was unclear in the scoping notice. The Draft EA clarifies that, “No road construction or timber harvesting are proposed within any IRA as part of this project.”
- Clearer articulation of the nature and relevance of the 2011 Finney AMA Management Plan – On Pg. 2 the Draft EA includes a section that goes into detail about the connection between the NWFP and the Finney AMA Management Plan developed in 2011.
- Clarification as to the Decision and Rationale for Using Agency Discretion to adjust LSR Guidelines within the Finney AMA – The draft plan makes clear the agency’s decision to not adjust the LSR guidelines within the Finney AMA as part of this process, explains why, and recognizes a future opportunity to explore this issue.
- Limitation and Clarification on Use of Condition-Based Management – The Draft EA clarifies that condition-based management will be restricted to vegetation management in riparian zones

and dispersed camping management on Pg. 14-17, and it lays out the specific criteria which will lead to various treatments based on conditions on the ground. This is an improvement on the condition-based management section in the Snoquera EA as it gives more clarity of how these decisions will occur after the EA is finalized.

Support for Purpose and Need of the Project

We support the need for the proposal which intends to improve watershed function; restore ecological processes and habitat characteristics for old growth dependent species; and protect and enhance Tribal reserved treaty hunting, fishing and gathering, and other cultural rights. We also support providing multiple uses on the landscape into the future, with a need to improve terrestrial and aquatic conditions and processes that respond to a changing climate, while identifying and managing sustainable recreational opportunities.

The need for proposal states the value of providing multiple uses on the landscape and specifically spells out: (1) terrestrial; (2) aquatic; (3) riparian; (4) and recreation. In addition, “socioeconomic” should be added to values that will be balanced by the Draft EA and included in the analysis of the full suite of desired outcomes in the Finney AMA Plan.

We specifically appreciate the language on Pg. 6 of the draft EA:

“Landscape restoration actions have the potential to contribute to the local and regional economies by providing timber, firewood, and other forest products. Restoration on the landscape requires a balance of access and natural resource management while being conducted in an economical manner.”

Complementary needs cannot be understated in the North Fork Stillaguamish Project and are appropriately accounted for in the NWFP. The NWFP (NWFP 1994 ROD Pg.26) includes a need for forest products from forest ecosystems, which is the need for a sustainable supply of timber and other forest products. A sustainable supply helps maintain the stability of local and regional economies and contribute valuable resources to the national economy on a predictable and long-term basis.

These needs were reflected by President Clinton at the Forest Conference when he spoke of the need “to protect the long-term health of our forests, our wildlife, and our waterways,” and of “the human and the economic dimensions” of the problem, and asked for a plan that would “produce a predictable and sustainable level of timber sales and non-timber resources” (NWFP 1994 ROD p.26).

Recommendations for Adjustments in the Final Draft Environmental Assessment

I. The Draft EA Conflates Management of Late Successional Reserves (AMA-R) and Adaptive Management Areas (AMA-NR) within the broader Finney Adaptive Management Area

Perhaps the Darrington Collaborative’s primary concern is that the Draft EA seems to overly defer to and misconstrue provisions in the Finney AMA Plan with respect to LSR management across the two distinct areas within the AMA (AMA-R and AMA-NR).

The Finney AMA Plan follows the guidance under the NWFP for this specific AMA that it be managed to restore late-successional forest and riparian habitat components (USDA, USDI 1994, Pg. D-13). This does not mean that all of the AMA (especially the AMA-NR) be managed as “Late Successional Reserves.” Furthermore, the Finney AMA Plan is not a decision document and was not a product of a full NEPA process like the Draft EA is.

The AMA Plan does not change the 1990 MBS Forest Plan's management categories or NWFP associated standards and guidelines, rather it provides a vision for achieving its emphasized objectives. The two primary objectives, or learning themes, identified in the Finney AMA plan are simply that, themes to learn by. We challenge the idea that under the NWFP, AMA plans must apply the more restrictive standards and guidelines of the congressionally reserved areas or late successional reserves *outside of those reserves*, such as the other land allocations within the AMA-NR portions of the planning area (NWFP ROD, 1994, p. 10).

The NWFP only identifies an emphasis on restoration of late-successional forests specifically managed under LSR guidelines within formally allocated LSR allocations. The AMA-NR portions of the planning area do not require management as an LSR and clearly allows for commercial timber harvest so long as it meets the AMA's ecological objectives.

This application of LSR standards and guidelines across all land management allocations is especially concerning within the areas designated under the 1990 MBS Forest Plan MA 14 Deer and Elk Winter Range and MA 17 Timber Management Emphasis which have their own specified goals under a NEPA decision document. Under the 1990 MBS Forest Plan, the goal for MA14 is “to provide improved winter range habitat for deer and elk, using variety of improvement techniques, including planting desirable forage species, fertilization, thinning, and design of timber harvest units, with emphasis on a distribution and specified ratio of habitat types for forage, thermal/hiding cover, and optimal thermal cover”, so long as the emphasis is to improve the habitat range (Pg.II-64).

The Timber Management Emphasis goal for MA17 “is to provide for the production of timber products on suitable lands” where “wildlife and fish habitat enhancement may be permitted *if timber production is not impaired*”. The proposed action alternatives are in direct conflict with these goals. We urge the Forest Service to reconsider treatment options for the AMA-NR portions of the planning area to take full advantage of the flexibility afforded AMAs in the NWFP.

II. Emphasis Area for Testing Scientific and Technical Innovation and Experimentation

With respect to AMA-R, we appreciate that the Draft EA provides management largely consistent with standard LSR guidelines under the NWFP. Because the LSR areas in the Finney are also AMA, and intended for experimentation, we understand and support the Draft EA's decision to follow suggestions in the Finney AMA Plan to slightly increase gap sizes associated with variable density thinning:

“Although no changes to LSR designations were proposed, some innovative treatment approaches were included in the plan and are proposed under this project. As an example, in this project, Variable Density Thinning (VDT) gaps, or areas of non-uniform openings, would be 0.5 to 2 acres in size as outlined in the Finney AMA Plan. Gaps, or openings, in LSR would normally be restricted to 0.25 acres in size” (Pg. 2).

In the same manner, the Forest could, and should, identify a different prescription that would achieve late successional habitat in the AMA-NR (outside of LSR) that establishes larger gaps. These experimental prescriptions (still focused on managing for late successional habitat) should be the subject of monitoring what impact the treatments have on stands as they grow into late successional habitat over time. Additionally, an opportunity is available to identify a stand that may not respond to traditional restoration thinning and may be a candidate for a pilot project to use variable retention harvest and create complex early seral habitat on a trajectory toward late successional habitat (see discussion on complex early seral below).

This is consistent with the goals and spirit of the Finney AMA Plan:

“There is a desire for the AMA to contribute some social and economic benefits to the surrounding communities through vegetation manipulations designed to achieve habitat management goals of the AMA. It is also expected that there will be coordination of adaptive learning with adjacent landowners, especially the DNR” (Pg. 15 Finney AMA Plan).

The Finney AMA Plan contemplates opportunities to experiment and monitor different approaches with late successional habitat as a goal, especially in the AMA-NR when it discusses its research goals and implementation:

“To learn if thinning (specifically variable density thinning) can be used successfully to affect development of taxonomically diverse, spatially heterogeneous, and multi-layered forests without substantially increasing risks of wind throw, fire, disease or other disturbances and while allowing the commercial harvest of trees and development and growth of large diameter trees of high commercial value in the Pacific Silver Fir Forest Zone” (Pg. 20 Finney AMA Plan).

The Finney AMA Plan summary also states that "successful implementation of the plan will require the development and maintenance of partnerships with research institutions, Indian Tribes, non-governmental organizations, and the timber industry." We appreciate the tribal involvement in huckleberry studies within the AMA Plan area. As a representative of the community and broader interested public, we recommend you also engage with the Darrington Collaborative to create opportunities for STEM and community education, monitoring, and additional experimental forest health prescriptions.

III. Finney AMA Plan Modification and Updated LSR Assessment

We understand that the steps to modify the Finney AMA and update the LSR Assessment would require more time and resources than are currently available (as described on Pg.2-3 in the Draft EA). However, we strongly suggest that the Forest undergo the Finney AMA Plan modification and LSR Assessment update in the near future. This would allow the flexibility to change broadly applied LSR standards and guidelines, while also ensuring there is an opportunity for future management across the area. The Darrington Collaborative would be happy to partner with the Forest to find and pool resources to support this effort. We suggest this be done as a separate planning process in the next 1-2 years to not hold up the actions analyzed in the Draft EA.

IV. Interest in Complex Early Seral Habitat Creation in targeted stands in AMA-NR

We encourage the Forest to consider creating complex early seral forest (CES) as an underrepresented and ecologically significant forest habitat type in the AMA-NR section of the planning area. The nature of the AMA land allocation in the project area is an opportunity to experiment in a limited number of stands that would not respond favorably to a restoration thinning on their “journey” to the late successional forest stage and may need to be reset.

The most important attribute to understand about CES is that this is a forest condition rather than a treatment. While we can use management tools to try to create CES, this resulting forest condition is an outcome of management in the same way that old growth forest structure could be an outcome of other types of management. Understanding the functions and services provided by CES forest, and the tools at our disposal to create CES, is critical to understanding how this forest structural stage fits into the MBS landscape.

Early seral forest is most simply the earliest stage of forest development. The beginning of the early seral forest stage is defined by the disturbance event (e.g., fire, windstorm, harvest) which restarts the forest developmental process. Early seral forests are defined by a lack of dominance of trees. There are two major types of early seral forest.

- The first type of early seral forest is **simplified early seral forest**, defined as having few to no biological legacies (e.g., large snags, large diameter logs, residual large trees from the previous cohort) and low levels of biological diversity. Simplified early seral forests are often dominated by one to a few species and can have low levels of vegetative cover. The simplified early seral forest stage can be fairly abbreviated, often lasting less than 5 years. This stage of forest development is often observed in forests under intensive forest management, but it can also occur because of high severity fire events.
- The second type of early seral forest is **complex early seral forest (CES)**. In contrast to simplified early seral, CES is defined by an abundance of legacy structures. Downed wood levels in this forest stage can be very high, second only to the old growth forest developmental stage. The CES forest developmental stage has the highest levels of biodiversity of any forest developmental stage due to a rich variety of shrubs and herbaceous species which are often CES specialists. The CES forest stage is also characterized by increased stream flows and high levels of nitrogen fixation. In the absence of vegetation suppression or artificial planting, this stage of forest development can persist for over 40 years before canopy closure.

The CES forest stage carries significant ecological functions but is currently underrepresented on the landscape. The high level of biodiversity that occurs in the CES stage provides forage and nesting opportunities and is an important landscape element in wildlife habitat. These elements can serve to lifeboat ecological diversity and function from one cycle of forest development to another. It is estimated that historically 5-20% of the landscape existed in the CES stage. Today, that number is around 3%. In contrast, the young forest stage which occurs immediately after canopy closure, and which provides some of the lowest levels of biodiversity and ecological services, is far overrepresented compared to what we estimate occurred historically. We currently have an opportunity to convert some of these simplified second growth forests to CES forest through restoration harvest treatments.

An important tool in CES creation is Variable Retention Harvest (VRH). VRH, like other harvest systems, is unique from thinning treatments in that the intention of VRH is to initiate a new cohort rather than accelerate the development of the existing cohort. VRHs aim to create continuity of ecosystem function

between rotations. Continuity is maintained through the retention of biological legacies and complex forest structures. This retention is variable both within and among harvest units in response to existing and desired conditions.

Retaining legacy structures between generations provides critical forest structure that provides important ecological benefits across stand developmental stages. Complex legacy structures provide habitat niches supporting biodiversity. Compositional legacies (retention of species) provide habitat and forage opportunities, and can be important to developmental functions (e.g., nitrogen fixation). Legacy retention can allow for the development of structural complexity that occurs on timescales longer than a single forest generation.

Key structures for retention include large and old live trees, large snags, and large diameter downed wood. Openings need to be created of sufficient size to allow for the initiation of understory communities and the eventual natural regeneration of a new cohort of trees. Site-specific considerations and existing important structures set sideboards for minimum amount of retention. As regeneration is a goal of a VRH, density needs to be lowered sufficiently to create growing space for the eventual establishment of a new cohort.

Efforts to create CES should be focused on stands with simplified forest structures and high densities. Stands with higher densities with single cohorts of trees and small crowns will likely not respond to thinning to develop old growth structural conditions. These stands could be better suited for regeneration through VRH. More mature stands with lower densities and healthier crowns should be prioritized for thinning to accelerate old growth structural characteristics.

V. *The Prescription Articulated for Variable Density Thinning is Incomplete*

We appreciate the prescription for Variable Density Thinning in Table 7 on Pg 10-11 of the Draft Plan. However, it appears to be incomplete and focuses almost exclusively on the heavy thinning and gaps that comprises 3-10% of the harvest unit. It indicates that heavy thins would consist of 20-50 residual trees per acre with a post treatment target density of 35% of Stand Density Index (SDI). What would the prescription (residual trees per acre etc.) be for the remaining 90% - 97% of the stand?

VI. *Need for a Commitment to Monitoring treatments and their success in establishing Late Successional and Riparian Habitat*

The Finney AMA Plan laid out specific learning themes and experimental management prescriptions focused on late successional and riparian habitat. It is not clear that these treatments were done over the last 12 years and, if so, what were the results of evaluating those treatments? Were they successful? Why or why not?

AMAs are designed to experiment toward a goal and try new approaches to gain new insight. To achieve the spirit of AMAs in the NWFP, the agency needs to do this experimentation and they also need to monitor conditions before and after treatment so learning occurs.

The Draft EA provides little or no discussion about the intent or commitment to monitor treatments in the AMA and evaluate their success moving forward. This should be added to the Final EA.

Thank you for the opportunity to comment on this important project. Please do not hesitate to reach out to us with any questions about these comments.

Sincerely,

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Dan Rankin Logging Inc.

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cc: Mt. Baker Snoqualmie National Forest Supervisor Jody Weil
U.S. Senator Patty Murray
U.S. Senator Maria Cantwell
U.S. Representative Suzan DelBene
U.S. Representative Kim Schrier
U.S. Representative Rick Larsen