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March 16, 2023

District Ranger Greta Smith
Mt. Baker-Snoqualmie National Forest – Darrington Ranger District
1405 Emens Avenue North
Darrington, WA 98241

Re: North Fork Stillaguamish Landscape Analysis Draft EA

Dear District Ranger Smith:

WildEarth Guardians respectfully submits these comments regarding the U.S. Forest Service's draft environmental assessment (Draft EA) for the North Fork Stillaguamish Landscape Analysis on 61,692 acres within the North Fork Stillaguamish Watershed. We previously submitted comments November 16, 2022, and appreciate the Forest Service's efforts in preparing the Draft EA and associated resource reports. We offer the following comments on the Draft EA:

Silviculture

- The Forest Service proposes to use variable density thinning (VDT) to "expedite development of desired structural characteristics to improve Late Successional and Old Growth habitat capacity for northern spotted owls and marbled murrelets." Draft EA at 10. This includes the use of "heavy thinning" to purportedly promote "rapid growth of individual trees by reducing competition for light and water resulting in large live trees over time[.]" *Id*. Stands identified for VDT could be commercially thinned over the next 15-20 years. *Id*. At 11. Heavy thins would consist of 20-50 residual trees per acre with gaps between 0.5 to 2 acres in size. *Id*. Maximum diameter for removal would be 20 inches diameter breast height (DBH) unless trees over 20 inches DBH are prohibiting reaching density objectives, in which case removal of trees up to 26 inches DBH would be permitted. Draft EA at 11, 64. The Forest Service says that "[c]onsideration would be made to leave as many stand components directly related to late-successional development as possible" such as "large, broken and diseased trees important for snag recruitment, nesting habitat, and large snags or logs." *Id*.
    - Comment: While we appreciate the Forest Service's desire to improve habitat for northern spotted owls and marbled murrelets, we are concerned whether the VDT proposed for this project will achieve those objectives. Can the Forest Service disclose updated monitoring data to support the assertion that "heavy thinning" will result in improved habitat conditions for these species? The latest monitoring data that we were able to find on the website is from 2009, which is outdated at

this point. In addition, the article the Forest Service relies on (Hayes, et al. 1997) is over 25 years old and stated that "our knowledge of long-term responses – where benefits are most significant – to thinning is scant." That underscores the need for updated, long-term studies. Moreover, that article references a 1992 study comparing different levels of thinning in young forests on the development of large live trees. The most intense thinning resulted in 50 to 100 trees per acres. Here, the Forest Service proposes to thin stands down to 20 trees per acre, which neither the Hayes article, nor the study it analyzed, considered. What research does the Forest Service have to show that thinning young stands down to 20 trees/acre will achieve the desired results?

- Comment: We are also concerned that the Forest Service is leaving itself too much discretion when it says it would give "consideration" to leave as many stand components directly related to late-successional development "as possible." While we question relying on Hayes 1997 for thinning stands down to 20 trees/acre, that article also cautions that any thinning to enhance habitat for species associated with late seral conditions hinges upon maintaining "critical structural components, such as dead wood." Combined with heavy thinning, if the agency considers, and then decides against leaving these stand components, then the stands would likely be much different than what is purported to be the desired future condition. The Forest Service should make it mandatory to maintain these late-successional stand components.

Roads

- The Forest Service proposes to use temporary roads, including the use of existing unclassified roads (39.64 miles), previously decommissioned roads (4.3 miles), and new temporary roads (19 miles). Draft EA at 12. The Forest Service claims that all of these roads would be "rehabilitated post project." *Id*. Rehabilitation includes: reducing compaction, planting with native seed, adding surface cross drains or drainage dips, removal of temporary culverts, camouflaging road junctions and scattering with slash as needed. *Id*.
    - Comment: As we stated in our scoping comments, we urge the Forest Service to avoid construction of temporary roads. If avoidance cannot be achieved, we urge the Forest Service to require rehabilitation within a specific timeframe as opposed to "post project." Considering that the Forest Service expects project implementation could last at least 20 years, "post project" means that temporary roads may not be rehabilitated for a very long time, which could result in significant impacts to aquatic resources.[1]
    - Comment: We also urge the Forest Service to include decommissioning and recontouring within its definition of rehabilitation and that that is what it should strive toward, again, within a specific timeframe. There is some confusion about this because while the definition of "rehabilitation" on p. 12 does not include decommissioning and recontouring, later the Forest Service says the temporary

[1] This is supported by the fact that the existing legacy road network and related infrastructure "are the primary sources of impeding water quality and fisheries habitat function in the project area." Draft EA at 13.

roads "would be restored to a full contour recovery post-use." Draft EA at 38. We think some clarification is needed and that the Forest Service should require decommissioning and full recontouring of any temporary roads that are constructed/used in relation to this project.

- The Forest Service proposes to stormproof certain roads and remove/replace undersized culverts that are barriers to fish migration. Draft EA at 13-14.
    - Comment: We support the Forest Service's efforts to stormproof roads and remove and replace undersized culverts in order to improve water quality and fish migration. How would this aspect of the project be funded?
- The Forest Service rated two subwatersheds (Day Creek and Lower Deer Creek) as "poor" for both aquatic habitat and roads/trails. Draft EA at 37. Another subwatershed (Headwaters NF Stillaguamish River) is rated "poor" for aquatic habitat and "fair" for roads/trails. *Id*.
    - Comment: The Forest Service should prioritize restoration efforts in these subwatersheds, specifically road decommissioning. Between the two action alternatives, we support Alternative 3 with respect to this part of the project as it calls for decommissioning 0.8 miles of road in the Day Creek watershed, 2.7 miles in the Lower Deer Creek watershed, and 22.1 miles in the Headwaters NF Stillaguamish watershed. *Id*. at 39. We support the other road decommissioning proposals in Alternative 3 as well, which is nearly four times as much decommissioning than Alternative 2.
    - Comment: The following roads (road segments) are at least partially within the Day Creek watershed and have an objective for "decommission" according to the Forest Service's GIS Data Clearinghouse: 1766000, 1755017, 1766020, 1755020, 1765550, 1765020, and 1755000. The Forest Service should analyze whether these roads should be decommissioned as part of this analysis. Two of these roads, 1755017 and 1755020, have an objective for decommissioning but in the Draft EA that objective is changed to maintaining these roads as ML 1 in both action alternatives. Considering the poor quality of roads and aquatic habitat in the Day Creek watershed, the Forest Service should reconsider whether it is better to decommission these roads to improve aquatic habitat.
    - Comment: The following roads (or road segments) are at least partially within the Headwaters North Fork Stillaguamish River watershed and have an objective for "decommission" according to the GIS Data Clearinghouse: 1800017, 2840022, 2871000, 2880000, 2840016, 2872000, 2800019, 1731019, 2815000, 2832000, 1732013, 2950011, 2890000, 1731017, 2840023, 2840018, 1731018, 1731020, 2849000, 1731011, 2851000, 2800020, 2956000, and 2886000. The Forest Service should analyze whether these roads should be decommissioned as part of this analysis.
    - Comment: The following roads (or road segments) are at least partially within the Lower Deer Creek watershed[2] and have an objective for "decommission" according to the GIS Data Clearinghouse: 1754000, 1723000, 1749015, 1750016, 1750011, 1749000, 1751000, 1700300, 1755013, 1755014, 1755015, 1755000,

[2] Some of these roads overlap with the Day Creek watershed.

1755019, and 1755012. The Forest Service should analyze whether these roads should be decommissioned as part of this analysis.

- The Forest Service acknowledges that Subpart A of the Travel Management Rule "requires identification of the minimum road system." Draft Transportation Report at 7; *See also* Draft EA at 5. The Forest Service further states that both action alternatives would "contribute" to Subpart A's "objective directions for a minimum road system." Draft EA at 68.
    - Comment: The Forest Service's claim that either action alternative would "contribute" toward "objective directions for a minimum road system" does not comply with Subpart A's requirement to identify a minimum road system (MRS). *See* 36 C.F.R. § 212.5(b)(1). We discussed the Forest Service's obligation to identify the MRS in this project-level analysis in our scoping comments. *See* Scoping Comments at 2-3. The Draft EA fails to identify the MRS for the North Fork Stillaguamish Project area, which should be identified before a decision is made on this project.[3]
    - Comment: The Forest Service needs to be more aggressive in reducing its massive road system. In just one fiscal year, the deferred maintenance on transportation-related assets increased from $4.2 billion to $5.4 billion. *See* Table 1. On the Mt. Baker-Snoqualmie National Forest, the agency maintains only about 25 percent (~600 miles) of its road system. *See* Sustainable Roads Strategy at 7 (2015). In this project area, the Forest Service notes that "[o]verall, most road conditions could be rated as very poor to fair" with "multiple deferred maintenance needed." Draft Transportation Report at 11. Multiple roads are identified in the Draft Transportation Report as being heavily slumped, eroded or washed out. *Id*. at 11-12. Several other roads are identified as needing bridge replacements and aquatic organism passages with an estimated cost of $2.5 million. *Id*. at 12. Complying with Subpart A, identifying the MRS, and taking aggressive action to decommission unneeded roads can begin to reverse this unsustainable trend.

[3] Part of the problem may be due to the fact that the Travel Analysis Report for the Mt. Baker-Snoqualmie National Forest, called the Sustainable Roads Strategy (SRS), claims that that the Travel Management Rule mandated a "sustainable road network" by 2015 that "provides a vision of a road system more aligned with realities and informed by on-the-ground needs such as recreational and cultural access and aquatic impacts." Sustainable Roads Strategy at 5 (2015). While we agree that the agency should work toward a more sustainable road network, that is not a substitute for the requirement in Subpart A to identify a "minimum road system," a phrase which does not appear in the SRS.

Table 1: Deferred Maintenance & Repairs for USFS Transportation Assets (in millions).[4]

Asset	FY21	FY22	Change (%)
Roads	$3,506	$4,420	+ 21%
Bridges	$410	$430	+ 5%
Trails	$288	$489	+ 41%
Trail Bridges	$44	$52	+ 15%
TOTAL	**$4,248**	**$5,391**	**+ 21%**

- There are 46.7 miles of roads where the current objective level is to "decommission" but the Draft EA sets the maintenance level at ML 1 or ML2. *See* Draft EA, App. C, Table C2. Of that mileage, 30.23 miles are identified as being a "high risk" for aquatic resources. *Id*.
    - Comment: At a minimum, the Forest Service should reconsider whether to change the objective from decommission to ML 1 or ML 2. Are these roads needed for specific project activities? If so, what are those activities? If not, what is the rationale for changing the objective to ML 1 or ML 2?

Conclusion

As conservationists and visitors to the Mt. Baker-Snoqualmie National Forest, we use the roads and trails but also recognize the harm that aging and unmaintained roads cause. The Forest Service's current road system is oversized for current uses, unaffordable with current budgets, and causing significant harm to wildlife and aquatic species. In addition, unmaintained roads are impacting access when storms take out roads.

A road system that is too large for current budgets can lead to unplanned road closures, often to key recreational destinations, because of lack of road maintenance. We are certain that with thoughtful planning and clear communication, the Mt. Baker-Snoqualmie National Forest staff can identify a minimum road system that is balanced. This endeavor to identify and manage a minimum road system is one of the most important efforts the Forest Service can undertake to restore aquatic systems and wildlife habitat, facilitate adaptation to climate change, ensure reliable recreational and community access, and lower operating expenses.

If you have questions, please contact us.

Sincerely,

[4] U.S. Forest Service, National Forest System Statistics Fiscal Year 2021 (Attachment 1); U.S. Forest Service, National Forest System Statistics Fiscal Year 2022 (Attachment 2).

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