



SIERRA PACIFIC INDUSTRIES

14353 McFarland Rd. • Mt. Vernon, WA 98273 • (360) 424-7619 • Fax (360) 428-6834

March 16, 2023

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

RE: North Fork Stillaguamish Draft EA Comments

Dear Gretchen,

Thank you for the opportunity to provide Draft Environmental Assessment (EA) comments on the North Fork Stillaguamish Landscape Analysis.

Sierra Pacific Industries (SPI) is a third-generation family-owned company based in Anderson, California that employs over 6,000 employees nationwide and operates a combined 16 sawmills in California, Oregon, and Washington. These sawmills rely on timber that is generated on Federal Forests, including the Mt. Baker-Snoqualmie National Forest.

In general, SPI supports the North Fork Stillaguamish Landscape Analysis and offers the following comments to improve it;

- Strengthen the description of the economic benefit to the local community within the Need for the Proposal. Including, but not limited to; commercial timber management, access benefits, bridge replacement, importance of funding sources for non-commercial projects, etc.
- Treat the most acres as possible by implementing Alternative 2.
- Maximize Riparian Reserve treatments so that they can reach conditions that are consistent with late seral stage quicker than if left untreated.
- Treat the most acres as possible by utilizing the Riparian Reserve condition-based treatments outlined in Alternative 2.
- Maximize Riparian Reserve treatments that occur adjacent to, and concurrently with, active harvest operations.
- Maximize opportunities that allow for 'condition based' metrics for yarding and hauling operations outside of the Normal Operating Season.
- Maximize flexibility and opportunities to incorporate modern harvesting equipment, including tethered harvesting systems, into both the EA and contract(s).
- Maximize the total treatment acres so that goals and objectives outlined in the Need for the Proposal are met.
- Seek out and identify suitable areas for Variable Retention Harvest (VRH). Especially in the Timber Emphasis and Deer and Elk Winter Range land-use allocations.
- Replant openings created by Variable Density Thinning within the Timber Management Emphasis Area.

- Maximize net timber value by implementing gaps of 2 acres in size and applied to the maximum 10% of the harvest unit(s), as well as utilizing Heavy Thins to the maximum 10% of the harvest unit(s).
- Eliminate stand age limits. When/where this is not possible, determine stand age at time of **implementation**, not time of *planning*.
- Assure and disclose the stand characteristics (age, diameter, commercial potential, etc.) on the 6,492 'Stand Improvement' (pre-commercial thinning) acres associated with Alternative 2 and not included in huckleberry enhancement treatments.
- Minimize stand improvement thinning acres that are tied to commercial timber projects.
- Maximize habitat diversity and huckleberry habitat within the Mountain Hemlock Zone by pursuing and obtaining a programmatic Forest Plan Amendment.
- Ensure that the completion of any plan amendment does not interfere with project timeline targets.
- When developing and implementing harvest prescriptions, eliminate diameter at breast height (DBH) restrictions.
- Allow for extraction of larger DBH trees, rather than leaving them on site.
- Dismiss Alternatives 1 and 3 as they do not meet the goals and objectives outlined in the Need for the Project.
- Consider the following when making decisions to decommission and/or 'store' road segments;
 - o Determine any potential resource risk related to a road segment.
 - o Determine the access value provided by a road segment.
 - o Determine whether the resource risk outweighs the access value (for timber management and other resource needs).
- As recognized by the Intergovernmental Panel on Climate Change, maximize carbon sequestration by actively managing as many acres as possible.
- Maximize volume per acre removal across all land-use allocations.
- Maximize stumpage values of timber sold.

Finney Adaptive Management Area (AMA)

The Draft EA states that the North Fork Stillaguamish project area is located completely within the Finney AMA. Furthermore, the Finney AMA Plan Final 2011 document states on Page 1 within the Summary section 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*** (emphasis added). While there have been opportunities to submit comments during the Scoping and Draft EA phases, as well as one public meeting and field trip, it is important to note that to date, there has been no direct communication with SPI regarding this project outside of these few opportunities. The local timber industry consists of two high production sawmills, SPI being the largest, that have the ability and willingness to assist. It is imperative that the Forest Service actively seek out, develop, and maintain relationships with personnel from the local infrastructure. Not only during the implementation phase, but during the planning phase as well. I look forward to this occurring in the future.

Economics & Early Seral Habitat – VRH Treatments

During the Scoping period there were 13,787 acres (22% of the total project area) of commercial thinning that were proposed. The Draft EA, Table 6, shows that this acreage has been reduced to a maximum of 10,572 acres (17% of the total project area) receiving commercial thinning treatments. This will likely decrease even further as more information is gathered and identified – unstable slopes, stream identification & typing, access issues, etc. Economics will become even more important as total

dollar value decreases and total dollar costs (stand improvement, road decommissioning & storage, Aquatic Organism Passage upgrades, etc.) increases. One way to improve economics and total dollar value is through VRH treatments. The use of VRH was discussed during Scoping, but the amount of acreage that could receive VRH treatment was not disclosed. The Draft EA indicates that there will not be any VRH treatments. This is disappointing. VRH is a tool that decreases harvesting costs while also creating early seral habitat – which is a characteristic of old-growth and late-successional forest habitats. In addition, it also creates openings that are suitable for ungulate and deer foraging opportunities (as stated in the Scoping letter), which should be a priority within the Deer and Elk Winter Range land-use allocation. Please thoroughly consider this management tool going forward.

Easements

Of specific concern is a recommendation which appeared in the Draft Transportation Report (undated report, posted February 13, 2023). Under Alternatives 2 and 3 it is proposed that the Forest Service vacate easements from MP 0.47 to 6.65 on Forest Service Road 281000 (also known as North Mountain Road) where the existing road crosses State, Seattle City Light, and private lands, including some owned in fee by SPI. SPI does not believe this specific action has been adequately defined, nor that the effects of the action have been fully disclosed and analyzed, nor has mitigation been identified. There is heavy historic and ongoing public use of this road segment by Forest Service visitors for recreation purposes. The proposal does not adequately address how alternative routes will be provided to Forest Service users, what actions are necessary to redirect and limit users to the alternate routes, and what sort of maintenance or upgrade will be necessary for the alternate routes to safely accommodate such an increase of traffic levels without incurring significant adverse environmental consequences. The predictable effect will be that the extra maintenance costs associated with Forest Service users' traffic will fall to the underlying landowners yet Forest Service would be relieved from providing its share of the financial burden as determined under the existing easements. Further, the proposal does not adequately disclose the details of the proposed modifications to existing easements, potentially leaving certain users without clear rights of ingress and egress, particularly with respect to MP 0.47 to 0.81 (State), MP 0.81 to 0.89 (Seattle City Light), MP 0.89 to 1.33 (State), and MP 1.33 to 1.55 (State). In addition, Forest Service lacks any recorded easement rights to the segment of the current North Mountain Road MP 2.23 to 2.39 (SPI), so it is inappropriate for Forest Service to vacate rights it does not possess; the proposal does not appear to include the original location of the easements between MP 2.23 and 2.39 but should. We suggest that this element of the proposed action be dropped unless these issues can be fully addressed and mitigated; focused consultation with all the affected landowners would be beneficial.

Thank you for the opportunity to provide Draft EA comments on the North Fork Stillaguamish Landscape Analysis Project. I look forward to this project being implemented.

Sincerely,



Adam Ellsworth
Log Procurement Manager
Burlington Division
Sierra Pacific Industries