



March 15, 2023

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

RE: North Fork Stillaguamish Landscape Analysis Draft Environmental Analysis Comments

Dear Ms. Smith:

The American Forest Resource Council (AFRC) submits the following comments on the Draft Environmental Analysis for the proposed North Fork Stillaguamish Landscape Analysis project.

AFRC represents the forest products industry throughout Oregon, Washington, Idaho, Montana, and California. AFRC's members include over 50 forest product businesses and forest landowners. AFRC's mission is to advocate for sustained yield timber harvests on public timberlands throughout the West to enhance forest health and resistance to fire, insects, and disease. We do this by promoting active management to attain productive public forests, protect adjoining private forests, and assure community stability. We work to improve federal and state laws, regulations, policies, and decisions regarding access to and management of public forest lands and protection of all forest lands. Many of our members have their operations in communities adjacent to the Mount Baker Snoqualmie National Forest (MBSNF), and the management on these lands ultimately dictates not only the viability of their businesses but also the economic health of the communities themselves. The forest products sector in Washington State continues to provide around 40,000 direct and about 100,000 indirect jobs. Many of these jobs are found in rural communities like those in the surrounding areas of the Darrington Ranger District and the MBSNF. In addition to the wages paid, the taxes and other monetary transactions generated by these businesses and family-wage jobs, contribute to the infrastructure and well-being of the local communities. AFRC submits these comments on behalf of its members.

Lack of supply of raw materials to fill manufacturing demands for wood products continues to be an issue in Washington. Decreases in volume from both public and private forest lands available in the marketplace will challenge the viability of some businesses in the forest products sector in the near future. Vegetation management projects, both current and future, on the MBSNF can help contribute to the wood supply in Washington that many mills depend

on to continue operation and employment of their work force. The economic activity created through these treatments contributes to the greater community well-being. As well as providing our society with carbon friendly wood products.

General Comments:

In our scoping comments we had highlighted a desire to see more emphasis on the economic benefits of this project through active commercial timber management. While the Draft EA does add some additional context to the Purpose and Need of this project. We still believe the Forest would be well served to highlight the multiple economic benefits commercial timber management provides both on and off of the MBSNF.

The percentage of treatable acres in both action Alternatives is a positive step in the ongoing management of the Forest and appears to maximize the acres treated under this EA. During implementation we would encourage the Forest to work to assure the maximum number of treatable acres are included in projects offered to the market.

Riparian

AFRC is pleased to see proposed treatments conducted in riparian reserves. Past harvest practices have left many of these riparian areas in a structurally simple state. Active management in these areas can provide both ecological and economic benefit to meeting the goals of the overall project. Thinning treatments can accelerate attainment of desired future conditions more consistent with later seral stage and provide timber volume into the marketplace to benefit the economic and community benefit goals of the project.

Operating Season

The MBSNF has taken a very positive step forward in the development of its “Project Design Criteria” related to the Normal Operating Season (NOS). We applaud the MBSNF for the inclusion of “condition based” metrics for yarding and hauling operations outside of the NOS. The ability for operators to extend operations when weather conditions are conducive to yarding and hauling outside of the NOS, increases the potential for economically viable projects. This “condition based” metric in the Design Criteria for operations outside of the NOS has been successful on other National Forests, as well as private and state forest lands, that have similar or more stringent resource protection requirements.

Logging Systems

AFRC is pleased to see the MBSNF looking to incorporating modern harvesting equipment in the allowed logging systems in this proposal. The addition of tethered harvesting systems as appropriate and approved for use in the North Fork Stillaguamish Project has the potential to increase economic viability while also increasing the safety of the logging crews conducting the work. Combining the suite of logging systems identified for this project along with the Design Criteria for their use should in general assist in the development of economically viable harvest operations.

Adaptive Management Areas

The project is potentially not aligned with the Adaptive Management Areas (AMA) direction of the NW Forest Plan, causing concern. The information provided regarding management directives and opportunities for AMA is brief and lacks detail. The land allocation for AMA is intended to facilitate the development and testing of innovative management strategies that can effectively integrate ecological, economic, and social/community objectives. However, in the NF Stillaguamish EA, the innovative treatment proposed seems to be a replication of the Finney AMA project carried out in 2012, with no mention of any lessons learned from the previous treatments. The absence of any reference to adaptive management raises questions about how this project will incorporate long-term ecological, economic, and social/community objectives.

The EA describes a management protocol that ignores the distinction between AMA-R & AMA-NR and does not follow the Finney AMA Plan guidance. We strongly encourage the Forest to address these differences and assure compliance with the Finney AMA Plan and the spirit of the AMA land allocations.

Innovative management consistent with social, economic and justice considerations in AMA-NR could consist of a multiple age ecologically based harvest strategy beyond the 80-year assumed culmination of mean annual increment described in the National Forest Management Act (NFMA).

Stand Improvement Treatment

Where commercial opportunities exist on acres identified for 'Stand Improvement Treatments' we encourage the Forest to minimize the non-commercial work. Significant non-commercial work could negatively impact the economic viability of the project.

Alternative Specific Comments

Alternative 2

AFRC generally supports Alternative 2. The described proposal appears consistent with the original purpose and need for the project. This alternative appears to maximize needed

treatments in riparian areas. Places more roads into long term storage, thus allowing for future use as needed.

We do strongly encourage the Forest to Maximize opportunities that allow for 'condition based' metrics for yarding and hauling operations outside of the Normal Operating Season. Thus allowing for maximum operational efficiency.

We encourage the Forest to assure the final EA allows the needed flexibility in prescriptions for implementation to assure adequate volume per acre and diameter of trees to be harvested to maximize operations as well as economic viability. Where allowed remove or significantly increase any proposed diameter limits on trees proposed for harvest.

Alternative 3

AFRC generally does not support Alternative 3. This Alternative provides the least number of acres of treatments and decommissions the most miles of roads limiting future opportunities for management.

Thank you for the opportunity to comment on this project. We look forward to participating in the further development of this proposal. Should you have any questions regarding the above comments or would like additional information, please contact me at 360-352-3910 or mcomisky@amforest.org.

Sincerely,



Matt Comisky
Washington State Manager
American Forest Resource Council