



# SIERRA PACIFIC INDUSTRIES

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VIA online submission: [Comment Analysis and Response Application \(CARA\)](#)

May 30, 2023

Reviewing Official, Region 6 Regional Forester  
Pacific Northwest Region, USDA Forest Service  
Attn: 1750/1950 Objections  
1220 SW 3<sup>rd</sup> Avenue,  
Portland, OR 97204

RE: North Fork Stillaguamish Landscape Project Draft Decision Notice Objection

Pursuant to 36 C.F.R. Part 218.7, Sierra Pacific Industries (SPI) files this objection to the proposed draft decision for the North Fork Stillaguamish Landscape Project. Jody Weil, Forest Supervisor, is the responsible official. The North Fork Stillaguamish Landscape project occurs on the Darrington Ranger District on the Mt. Baker-Snoqualmie National Forest.

Although this letter is being written during the Objection Period, it is important to note that SPI supports many aspects of the Project and is looking forward to it moving forward to implementation. SPI has been engaged, and participated in, some aspects of the Project, including a virtual overview meeting of the Project on May 18, 2022, and a field tour of the Project area on August 25, 2022. SPI also provided Scoping comments on May 23, 2022, and Draft EA comments on March 16, 2023.

## **Objector**

Sierra Pacific Industries  
14353 McFarland Road  
Mount Vernon, WA 98273  
(360) 424-7619

Sierra Pacific Industries 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. The North Fork Stillaguamish Landscape Project will, if properly implemented, help ensure a reliable supply of public timber in an area where the commodity is greatly needed.

Objector's Designated Representative:  
Adam Ellsworth, Log Procurement Manager  
14353 McFarland Road  
Mount Vernon, WA 98273  
360-424-7619 ext.1412  
[aellsworth@spi-ind.com](mailto:aellsworth@spi-ind.com)

The content of this objection below is based upon the prior specific written comments submitted by SPI in response to the Draft EA

1. As proposed, a maximum of 1,275 acres, just 2% of the Project area, of variable density thinning in riparian reserves would occur by adopting riparian reserve buffers from Alternative 3. Commercial acres treated could more than double by adopting and implementing riparian reserve buffers from Alternative 2. SPI recommends that the Forest reevaluate their decision to adopt riparian reserve buffers from Alternative 3 and adopt riparian reserve buffers from Alternative 2 as it aligns more with the Purpose and Need of the project. More specifically, the Draft EA states within the Need for the Proposal.

*Terrestrial: Enhance the development of late-successional and old-growth forest habitats by improving habitat diversity in young stands, improving spotted owl and marbled murrelet nesting habitat, increase forest biological complexity and resiliency.*

*Riparian: Enhance riparian areas for the benefit of both aquatic and terrestrial species.*

In SPI's opinion, the goal of any Forest Service vegetation management project should be to meet the stated project objectives to the maximum extent across as many acres of the project area as possible.

SPI commented in our scoping and Draft EA documents that we would like to see active management in the riparian areas. SPI believes there is sound science behind treating in these areas and would like the Forest to consider that it has been well documented that thinning in riparian areas accelerates the stand's trajectory to produce large conifer trees and has minimal effect on stream temperature with adequate buffers. Removal of suppressed trees has an insignificant short-term effect on down wood, and ultimately a positive effect on long-term creation of large down woody debris and large in stream wood, which is what provides the real benefit to wildlife and stream health. SPI encourages the Forest Service to focus their riparian reserve treatments on a variety of native habitats.

The tradeoffs that the Forest Service will likely be considering through the ensuing environmental analysis will be between achieving these forest health benefits and potentially

having adverse impacts to streams. These impacts to streams typically include stream temperature, wood recruitment, and sedimentation associated with active management.

**Resolution Requested**

SPI requests that the Deciding Official not incorporate any elements of Alternative 3 into the selected alternative. Rather, select riparian reserve condition 1 under Alternative 2.

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2. SPI continues to believe that the Forest should not terminate easements on the 2810000 (North Mountain Road). 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. SPI continues to suggest that this proposed action be dropped unless issues can be fully addressed and mitigated by conducting a focused consultation with all affected landowners.

**Resolution Requested**

SPI requests that the Deciding Official not terminate 2810000 (North Mountain Road) prior to in-depth and focused discussions with all impacted landowners.

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**Request for Resolution Meeting**

Pursuant to 36 C.F.R. § 218.11, the objectors request to meet with the reviewing officer to discuss the issues raised in this objection and potential resolution. In the event multiple objections are filed on this decision, SPI respectfully requests that the resolution meeting be held with all objectors present. SPI believes that having all objectors together at one time, though perhaps making for a longer meeting, in the long run will be a more expeditious process to either resolve appeal issues or move the process along. As you know, 36 C.F.R. § 218.11 gives the Reviewing Officer considerable discretion as to the form of resolution meetings. With that in mind, SPI requests to participate to the maximum extent practicable, and specifically requests to be able to comment on points made by other objectors during the objection resolution meeting.

Thank you for your efforts on this project and your consideration of this objection. SPI looks forward to our initial resolution meeting. Please contact our representative, Adam Ellsworth, at the address and phone number shown above, to arrange a date for the resolution meeting.

Sincerely,

A handwritten signature in blue ink that reads "Adam Ellsworth". The signature is written in a cursive, flowing style.

Adam Ellsworth  
Log Procurement Manager  
Sierra Pacific Industries  
Burlington Division