



December 21, 2020

Jody Weil  
Forest Supervisor  
Mt. Baker-Snoqualmie National Forest  
2930 Wetmore Ave., Suite 3A  
Everett, WA 98201

RE: South Fork Stillaguamish Vegetation Management Project

Dear Supervisor Jody Weil:

As members of the Darrington Collaborative, we are writing to share our support for the South Fork Stillaguamish Vegetation Management Project decision notice and final environmental assessment (EA) issued by the U.S. Forest Service (USFS). We understand that some entities are displeased with the project; we do not share these concerns, however, and want to reiterate the Collaborative's support for the project.

The Darrington Collaborative, launched on July 10, 2015, is a partnership between diverse interests such as major conservation organizations, local STEM education programs, the local timber industry, and the community of Darrington, with the goal of increasing ecologically sustainable timber harvests in the Darrington region, creating jobs, and improving and restoring the health of forests and watersheds.

The partnership grew out of the tragic Oso slide on March 22, 2014, which killed 43 people, destroyed homes, damaged public infrastructure including a main highway, and blocked the Stillaguamish River, causing significant environmental and economic damage. Conservation and recreation organizations worked with local community leaders to promote the incredible outdoor recreation opportunities near the scenic town of Darrington and to support the establishment of local STEM education efforts that have evolved into the Glacier Peak Institute.

#### Support for the Vegetation Management Project

The Darrington Collaborative agrees with the purposes of the project, which are consistent with the Northwest Forest Plan and other applicable laws and regulations governing vegetation management and restoration activities on the Mt. Baker Snoqualmie National Forest, and the goals of the collaborative. The stated purposes of the project include (Final EA, pages 8-9):

1. Enhance habitat conditions for old forest associated species with emphasis on nesting habitat for marbled murrelet and northern spotted owls.
2. Maintain and restore riparian vegetation composition and structural diversity while protecting and enhancing fish habitat and aquatic organism passage.
3. Manage the SF Stillaguamish Late Successional Reserve (LSR) on a landscape scale with the expectation that vegetation management may also contribute a supply of timber products to the public from the forest stand thinning.
4. There is a need and opportunity to build on the travel analysis in the Forest's 2015 Sustainable Road System Report and identify the minimum road system for the project area to comply with the 2005 Travel Management Rule.
5. Manage USFS infrastructure and facilities within the SF Stillaguamish project area to support not only the goals of the LSR, but also meet Tribal and recreational use within the watershed and to support administrative management of Forest lands.

#### Support for Landscape Level Approach

We appreciated the attempt by the USFS to undertake a landscape level analysis that addressed the condition and function of second growth stands within LSRs, as identified under the Northwest Forest Plan. Taking a landscape level approach provides opportunities to incorporate vegetative management with additional goals such as: aquatic restoration priorities; forest health and resiliency; access and travel management; recreational enhancements; and the Forest's efforts to implement a sustainable road system that provides access for recreational, administrative, and tribal use while addressing high aquatic risk legacy roads. The project was specifically designed to avoid significant impacts, and that was borne out in the EA. Therefore, we feel that an EA was the appropriate level of NEPA analysis for the South Fork Stillaguamish Vegetation Management Project, and that it provides efficiency and synergy between Forest management actions on the landscape.

LSRs were identified for several reasons, one of them being the establishment of a network of late successional habitat across a broad landscape in reserves that included areas of second growth stands established by timber harvest prior to 1994. The proposed thinning in this project, within designated LSRs, focuses on accelerating development of late successional forest characteristics in second growth plantations with an age of less than 80 years old.

We understand that achieving restoration goals for National Forest LSRs within the South Fork Stillaguamish project area requires timber sales as the enabling mechanism. Existing funding for such restoration activities is limited and the prospect of future funding is unclear. Trees removed in restoration thinning treatments have value. They can, and should, contribute to the local rural economy when projects can be developed consistent with the Northwest Forest Plan, as is the case here.

## Collaborative Engagement in South Fork Stillaguamish Project

On June 29, 2017, the Darrington Collaborative submitted a comment letter on the draft EA supporting the purpose and need of the project. While we did not participate in the objection process, we were aware that several groups did and that several issues, including identification of temporary roads, definitions on daylighting thinning, and additional language to be added to the Final EA, were resolved as part of that process, prior to a final decision notice being released on May 31, 2019.

After the final decision notice was signed, the Darrington Collaborative contracted with Resilient Forestry, resulting in 192 hours of on-the-ground work. That work entailed assisting with pre-sale layout and GPS area determination for the Mallardy Stewardship IRTC and Boardman sales implemented as part of the South Fork Stillaguamish project.

The Darrington Collaborative remains interested in partnering with the Forest Service to utilize Stewardship Authority and Good Neighbor Authority (GNA) as part of the South Fork Stillaguamish project to increase the amount of restoration work possible by providing additional and complementary funding through retained receipts and program receipts. Within the Darrington Ranger District, the Collaborative has assisted the Forest in offering two timber sales, Segelsen 1, which was a stewardship sale, and Segelsen 2, using GNA.

## The South Fork Stillaguamish Project Provides a Balanced Approach

In reviewing the final EA, the Darrington Collaborative feels that the South Fork Stillaguamish project provides a balance between several important values on the Forest. The stands identified for treatment are exclusively designated as LSR under 80-years-old, as required in The Northwest Forest Plan. This designation and age class allows for restoration thinning that is focused on enhancing the late successional character of those stands in the future. Overall, we believe these treatments, over time, will increase the diversity, habitat value, and resilience of these stands and the landscape. As indicated in the Draft EA, there is a large body of research demonstrating the benefits of thinning in dense plantations (Anderson and Ronnenberg 2013).

Additionally, none of the treated stands occur within areas with protections against timber harvest, like Inventoried Roadless Areas identified under the 2001 Roadless Rule or congressionally-designated Wilderness. Considering the mitigation measures and design features developed to avoid, reduce, eliminate, rectify, or compensate for the effects of project activities, nothing in this project will impact the important values that these roadless forests provide (i.e., old-growth forests, intact riparian corridors, fish and wildlife habitat, and sources of clean water).

Finally, it is our understanding that the project provides necessary access for timber harvest, while being consistent with the Mt. Baker Snoqualmie's Sustainable Road System. Existing Forest Service roads have been identified to provide access to stands and will receive, in some cases, long-overdue storm proofing and maintenance that benefits recreational, tribal, and administrative access and addresses aquatic risks. Additionally, temporary roads (that will not be added to the Forest Service road system) have been identified to provide necessary access for the project and will be decommissioned after use. These

temporary roads, some of which exist on past unclassified roadbeds, will receive attention that will improve the aquatic risk during their use and after they are decommissioned.

We offer our continued support for collaborative projects that appropriately balance ecosystem goals and restoration opportunities with a viable wood products industry that provides jobs and economic benefits to rural communities. As groups representing diverse perspectives regarding public land management, we stand ready to work with you to achieve this balance.

Sincerely,

Daniel O.Rankin,  
Mayor of Darrington, Rankin Custom Saw Mill

Jon Owen,  
The Pew Charitable Trusts

Megan Birzell,  
The Wilderness Society

Oak Rankin,  
Glacier Peak Institute

Paul Wagner,  
Atterbury Consultants, Inc.

Steve Skaglund,  
Three Rivers Contract Logging

Thomas O'Keefe, PhD,  
American Whitewater

Tim Johnson,  
Hampton Lumber

Tom Uniack,  
Washington Wild

CC: Senator Patty Murray  
Senator Maria Cantwell  
Representative Suzan DelBene  
U.S. Forest Service Regional (6) Forester Glenn Casamassa