

Erin Uloth
District Ranger
Mt. Baker Ranger District
Mt. Baker-Snoqualmie National Forest

June 26, 2020

Re: North Fork Nooksack Vegetation Management Project

Dear Ms. Uloth:

I love the Mt Baker-Snoqualmie National Forest. My husband and I were married in the National Forest at the Excelsior Group Campground, along the banks of the North Fork of the Nooksack River. We hike and climb along the Nooksack. As a science teacher, I have worked with the soil and water conservation district and taught forest management practices. I appreciate the opportunity to comment and share several concerns.

1. Habitat for murrelets and spotted owls. The public scoping letter states, *“There is a need for more habitat that provides nesting and other habitat characteristics for marbled murrelet and northern spotted owls, in the form of ‘Late Successional Reserve’ forest (LSR). Thinning previously harvested areas is a way to facilitate and expedite creation of LSR.”* This makes little sense. There are several issues:
 - a. In “Synthesis of Science to Inform Land Management Within the Northwest Forest Plan Area” you state, *“The murrelet’s association with late-successional and old-growth forests and its listed status made conservation of the murrelet an explicit goal in the design of the NWFP”* (pg 304). The scoping letter fails to explain how cutting trees will benefit spotted owls and marbled murrelets, birds that require older trees. At the very least, the scoping letter should say how thinning will be accomplished to improve habitat. But it fails to say the degree of canopy opening planned. It is impossible for the public to determine how well the plan fits your advertised objective. These birds thrive in mature forests. It makes no sense to cut older trees if the forest is already mature.
 - b. Habitat fragmentation threatens both murrelets and spotted owls. The proposal does not address this issue.
 - c. The NWFP requires murrelet surveys to be conducted before harvest on any other federal lands in the murrelet’s range. Yet there is no mention of murrelet surveys in the scoping letter.
2. Logging in Riparian Zones. The public scoping letter states: *“There is a need to improve the forest condition adjacent to bodies of water, known as ‘Riparian Reserves.’ Prior harvest in these areas has reduced species composition and structural diversity that supports plant, insect, and animal species dependent on these ecosystems.”* But the public scoping letter fails to say how more logging will repair the damage done by earlier logging. Again, the lack of detail in the public scoping letter about the degree of canopy opening makes it impossible to understand the proposed project. But to the extent the letter provides any detail, there are several reasons to think logging will harm riparian ecosystems and water quality.

- a. The best available science shows that timber harvest harms water quality. Your own documents say as much. In “Watershed Analysis for Canyon Creek” (1995), you said the watershed was in “*unacceptable hydrological conditions*” (Executive Summary). The analysis explained why: “*timber harvest activities have resulted in surface soil erosion*” (ES1). Yet the proposal calls for logging in and above sensitive riparian areas. Your current plan, again, assumes that doubling down on failed practices will solve the problems you have created with those same practices. That is arbitrary and capricious.
 - b. The proposal identifies 575 acres in riparian reserves to clear cut, 537 acres of riparian reserves in late successional reserves to commercially thin, and 581 acres of riparian reserve to non-commercially thin. According to your document, “Amendments to Forest Service and Bureau of Land Management Planning Documents Within the Range of the Northern Spotted Owl” riparian reserves are meant to “*protect the health of the aquatic system and its dependent species.*” Your public scoping letter fails to say how logging over 1,500 acres of sensitive riparian reserve will improve forest conditions or protect the health of aquatic conditions. Indeed, it will not. Logging will harm the health of the rivers, streams, and creeks. It is disingenuous—and contrary to the best available science—to say that logging will help water quality.
 - c. The proposal identifies several plots for commercial thinning in areas adjacent to Canyon Creek and identified as late successional reserve, including plots c17b, c80b, c170, c168. The public scoping letter fails to address how much the forest canopy near the creek will be thinned or how thinning will benefit the watershed. It is impossible to determine whether this fits with current management plans. Deviating from established plans in a way that affects more than a thousand acres requires preparing an environmental impact statement.
3. Huckleberry Habitat. The scoping letter states, “*The proposed project-specific plan amendment would allow non-commercial thinning within the Mountain Hemlock Zone MA-19 to enhance habitat for huckleberries.*” It states huckleberries “*benefit native pollinators and other wildlife and are of social and cultural importance*” and need “*moderate to full sun exposure for flowering and berry production.*” This makes little sense. Here are several concerns:
- a. The forest around the North Fork of the Nooksack is full of huckleberries. I know this from observation—my clothes have been stained with huckleberry juice after walking off-trail, through dense forest, near the North Fork of the Nooksack. Your public scoping letter fails to state *why* you have selected improving huckleberry habitat as a management goal.
 - b. Even if the forest needed more huckleberries, logging is unnecessary to enhance huckleberry habitat. *Plants of the Pacific Northwest* identifies black huckleberry as a “common understory [species] in ... dry coniferous forests.” While red huckleberries may benefit from additional stand openings, black huckleberries thrive in dense forests. Your public scoping letter fails to state which of several huckleberry species you have in mind, or why shade-tolerant huckleberries are inadequate to fill the ecological niche you think needs filling.
 - c. Even if you had established a need for huckleberry propagation and that your proposed action would advance that need, you have failed to balance the intended benefit of

more huckleberries against the costs of logging. Huckleberries are not endangered or threatened. Nor have you said that any of the species that depend on huckleberries are endangered or threatened. But other species that depend on the trees you intend to cut are. Your focus on huckleberries, without reference to countervailing considerations, lacks any reasonable explanation and is arbitrary and capricious.

4. Restoration of landscape through logging. The scoping document states, *“There is a need for a restoration of this landscape to a condition that would be resilient to major disturbances such as droughts, insect outbreaks and fires, and to provide and protect habitat for native species and species of concern.”* This is a commendable goal; however, clearcutting 1,861 acres is in direct opposition to the stated outcome.
 - a. Stand regeneration is, itself, a major disturbance that removes all trees from that area using heavy equipment. It causes habitat fragmentation, water quality degradation, reduces species of concern, and lows species diversity compared to taking no action. The public scoping letter does not explain how your proposed action will lead to a more resilient forest. Nor does it balance the prospects for reaching your goal against the risks that your actions to do so will be counter-productive.

5. Who benefits? The scoping document states, *“There is a need to maintain access to the national forest for a range of reasons, including active management, public recreational use, Tribal treaty right activities, administrative purposes, and others. Lastly, there is a need to contribute to the local economy in a way that sustains both local industry and forest resources.”* The scoping document demonstrates active management by proposing to thin or clear-cut 5,700 acres of forest. This would primarily benefit the logging industry. You fail to analyze how your proposed action would affect recreation or Tribal interests.
 - a. You fail to explain, for example, *why* hikers or Tribal members would benefit from the construction of a new road. You specify no specific treaty right that requires road access, rather than foot access. And you do not state why hikers would benefit from a new road.
 - b. You fail to quantify the effect of this logging on the local economy or to analyze where the felled timber will be milled.
 - c. And, again, assuming that your action will have some economic or cultural benefit, you fail to weigh this benefit against the concomitant economic or cultural costs, let alone the ecological costs.

6. Other species of concern. The scoping letter only mentions three species: spotted owls, murrelets and huckleberries. Several areas proposed for thinning are in or near mountain goat habitat, the effects on which are not addressed in the scoping letter. Your publication on North Fork of the Nooksack Watershed identifies 52 species of concern, from frogs to birds to mountain goats. Your publication on Canyon Creek Watershed identifies 24 species of concern including salmon, fishers, and big-eared bats. Twenty-five years ago, the Forest Service was concerned about salmon habitat in these creeks. If these species no longer matter to your management objectives, you need to explain why. Conversely, you need to evaluate which

other species your management objectives should further. These publications are 25 years old—you need updated information since the scope of your project impacts over 5,700 acres.

7. Other concerns not addressed. The scoping letter does not provide enough information for the public to evaluate your plan. Additional gaps in your public scoping letter include:
 - a. Failure to address logging's effects on soil erosion and landslide potential or how you plan to mitigate these problems, if at all.
 - b. The relationship between your proposed action and river designations. Several of the plots you selected for treatment appear to be within zones designated as "Recommended Recreation River" and "Recommended Scenic River."
 - c. Your maps failed to overlay the proposed plots on prior land use allocation, leaving the public guessing. This unfortunate shortcoming could have been solved in a few minutes with GIS.
 - d. How plots outside the Matrix were chosen for commercial thinning.

8. Finally, your process has impeded public comment. You made several documents available only late in the submission window. The public comment period is June 1- July 2, 2020. People who commented earlier did not have readily available access to resource documents. These documents include:
 - i. NF Nooksack Watershed Analysis, posted 6/19/20
 - ii. Canyon Creek Watershed Analysis, posted 6/19/20
 - iii. Nooksack Project Area Forest Management Plan Allocations, posted 6/23/20
 - iv. MBS Land and Resource Management Plan, posted 6/23/20
 - v. NWFP- Record of Decision- 1994, posted 6/23/20
 - vi. NWFP- Standards and Guidelines-1994, posted 6/23/20
 - vii. Climate Vulnerability Assessment, posted 6/24/20

We all want healthy forests that support multiple management objectives while remaining resilient to disturbance. Your responsibility for securing this common goal is a heavy one, requiring clear communication, intellectual honesty, and above all, a sense of humility when proposing big projects. I believe you and your staff know this. For that reason, it is disheartening that you proposed this action in a public scoping letter with such thin explanation and conclusory reasoning. We, as Washingtonians and Americans, who use and love this forest, deserve better. And you can do better. Doing so will require an Environmental Impact Statement.

Sincerely,

Rebecca Michener