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June 28, 2020

Erin Uloth, District Ranger
Mount Baker Ranger District
Mount Baker-Snoqualmie National Forest
810 State Route 20
Sedro-Woolley, WA 98284

Submitted to: comments-pacificnorthwest-mtbaker-snoqualmie-mtbaker@usda.gov

Subject: North Fork Nooksack Vegetation Management Project

Dear District Ranger Uloth:

The Sierra Club has reviewed the scoping information for the North Fork Nooksack Vegetation Management Project, and we appreciate the opportunity to provide comments, concerns, and suggestions regarding the development of this project.

This project proposes to implement a management structure on almost 6,000 acres of land, 1700 acres of which is within Riparian Reserves in a sensitive watershed, and proposes a Forest Plan amendment to carry out thinning activities in Mountain Hemlock zones. Just the scale of this project should require an Environmental Impact Statement (EIS) to satisfy NEPA requirements. The size of the project area, the sensitivity of the lands upon which the activities are to be undertaken, and the number of years over which the project will span are well beyond the limits of this EA, and we would request that a full EIS be developed to address the scope of the proposed actions.

In general, the Sierra Club would like to emphasize that this project must be conducted in conformance with all existing management direction including the 1994 NW Forest Plan (NWFP), the 1990 Land and Resource Management Plan (LRMP), and the 2000 Roadless Area Conservation Rule. In particular, we call your attention to the NWFP prohibition of all cutting within forest stands older than 80 years old located within Late Successional Reserves (LSR).

The North Fork Nooksack is designated as a Tier 1 Key Watershed as delineated by the Northwest Forest Plan, and Aquatic Conservation Strategy requirements within Tier 1 Key Watersheds establish that “The amount of existing system and nonsystem roads within Key

Watersheds should be reduced through decommissioning of roads. Road closures with gates or barriers do not qualify as decommissioning or a reduction in road mileage"[1]. The Forest should look at a significant reduction in road density in the project area, and eliminate roads where impacts of the roads and vehicle access impacts soils, aquatics, wildlife usage and primitive recreation. No new permanent roads should be constructed for this project, and we would request a reduction in the mileage of system roads within the study area to only those segments necessary for recreational and cultural access and that are *consistent with those administrative needs that are supported by reasonably expected agency budgets*. See Roads discussion below for additional discussion of roads within the Forest.

Adequate mapping must be prepared for the project in a timely manner to allow for review. Map scale must be large enough to be readable on a printed page of 8-1/2 x 11 inches. Minimum scale for all planning documents should be 3/4-inch = 1 mile. Mapping must include but not be limited to:

- proposed stand treatments (commercial and non-commercial) and road-building activities (including temporary roads) overlayed on Land Management Allocations and Riparian Reserves
- stand treatment priority for wildlife
- fish habitat streams
- stand age
- haul routes
- current and proposed road maintenance levels and current road drivability

Several Management Allocations (MA) have been identified as candidates for commercial and non-commercial thinning that were by 1990 LRMP direction not to be scheduled for timber harvest. This plan appears to be establishing a precedent of allowing stand entry by using the NW FP direction, in conflict with the LRMP. This is a cause for concern.

We are also interested in information regarding the expected quantity and type of herbicides to be used under this plan.

With regard to these general comments, our specific concerns and suggestions are as follows:

Project Area (PA):

Within the project area are located a number of Inventoried Roadless Areas (IRA) that are not mentioned in the scoping letter or the mapping. Specifically, these IRAs include:

- Mt Baker (Canyon Creek Block) Roadless Area 6041.[2]

[1] Standards and Guidelines, Attachment A to the ROD, Amendments to Forest Service and Bureau of Land Management Planning Documents Within the Range of the Northern Spotted Owl, page B-19.

[2] Final EIS Land and Resource Management Plan, Mt Baker-Snoqualmie National Forest, dated June 1990. pp C-16 thru C-23.

- Mt Baker (North Block) Roadless Area 6041.[3]
- Mt Baker (West Block) Roadless Area 6041, unit MK.[4]

These IRAs make up a significant portion of the PA. Per the direction of the Roadless Area Conservation Rule (2000), these IRAs are off limits for timber cutting or road construction. Please ensure the EA spells out these limitations in a clear an unambiguous fashion.

This Project must not take any actions that would prevent any unroaded lands from being inventoried per the current direction in FSM Chapter 70 (Wilderness Inventory and Evaluation Process), and no cutting should be considered for any unroaded lands in LSR land allocations. Additionally, NWFP direction within Key Watersheds specifies that "No new roads will be built in roadless areas in Key Watersheds."[5]

We would like to call your attention to an inventoried roadless area (IRA) mapping discrepancy. In Section 15 (T39N-R8E) IRA #6041 in Wells Creek, subunits MH and MS are mapped separately (not contiguously). However, the stand age in Section 15, both within the noted IRA gap and within each IRA is the same. There is no evidence of an abandoned road or old timber harvest unit in the gap. Furthermore, the merged land allocation for this part of Section 15 is MA 1B LSR, thus recognizing the gap's roadless character. We request that when the forest plan amendment for MA 19 is processed that Appendix C in the LRMP also be updated to reflect the noted IRA mapping discrepancy.

Project Need:

The Project Need statement declares that thinning operations will "facilitate and expedite creation of LSR", and that "there is a need to improve the forest condition adjacent to…Riparian Reserves." We expect the EA for this project to describe in detail how forest conditions in riparian areas will be improved by the treatments proposed in this project. We also expect a full analysis of the impacts on spotted owls and other late-successional and old forest associated species, and what is being done to restore these species, not merely a presentation of mitigation measures being proposed.

The Project Need statement establishes the need to maintain access to the forest. We ask that the EA assess all system roads in the PA, summarizing the purpose and need for each road segment. All roads associated with LSR stand ages in the 70-80 year age range should be planned for removal per management direction unless they are needed for some non-timber multiple-use. See Roads section below for further discussion of roads within the Forest.

[3] ibid, pp C-24 thru C-35.

[4] ibid, pp C-36 thru C-45.

[5] Standards and Guidelines, Attachment A to the ROD, Amendments to Forest Service and Bureau of Land Management Planning Documents Within the Range of the Northern Spotted Owl, page B-19.

The Project Need statement prescribes the need to "contribute to the local economy." We ask that the EA provide estimated contributions to the local economy as a whole and to the timber economy in particular. This assessment should include the current situation and the increment expected from the outputs of this project. Economic outputs should be described at the economic sector level in terms of employment and personal income. The geography of the "local economy" needs to be defined and evaluated numerically, with reference to CFR 219.8(b) for the requirements to evaluate local, regional, and national effects.

Land Management Allocations (LUA):

Late Successional Reserves (LSR):

- Following the Standards and Guidelines of the NWFP, we expect that LSR stands ages over 80 years old will not be cut, nor entered with new or temporary roads.
- Opportunities for road decommissioning should be aggressively pursued within LSRs. Specifically, in LSRs of stand ages between 70-80 years of age, roads should be mapped and preparations made for road decommissioning to be complete when stands reach 80 years of age. See Roads discussion below for additional details.
- In LSRs of any age, "Road construction in Late-Successional Reserves for silvicultural, salvage, and other activities generally is not recommended unless potential benefits *exceed* the costs of habitat impairment. If new roads are necessary to implement a practice that is otherwise in accordance with these guidelines, they will be kept to a minimum, be routed through non-late-successional habitat where possible, and be designed to minimize adverse impacts. Alternative access methods, such as aerial logging, should be considered to provide access for activities in reserves."[6] We expect compliance with this NWFP Standards & Guidelines (S&G) direction.

Riparian Reserves (RR):

- RR within the PA, particularly within LSRs, LSOG, MA 1A, MA 1B, MA15, and MA 19 should be fully mapped, at a readable scale, so that the public may see existing roads, planned roads and expected treatment areas. See mapping discussion in the introductory comments of this letter for additional details.
- For those treatments planned within RRs, no activity shall be allowed that retards or prevents the attainment of Aquatic Conservation Strategy objectives, and all activities shall follow the Standards and Guidelines specified for Riparian Reserves in the NWFP, in particular regarding Timber Management and Road Management.[7] Since these activities are expected to improve conditions, the specific methodology, rationale, and desired outcome shall be spelled out for just how these improvements and activities are to be beneficial, and how they will fulfill the Aquatic Conservation Strategy Objectives delineated in the Standards & Guidelines.[8] Cutting in RR's is not an excuse for getting volume out.

Matrix:

[6] ibid, p C-16.

[7] ibid, pp C-31 thru C-33.

[8] ibid, p B-11.

- Cutting in Matrix should be limited to stands up to 80 years old, similar to LSRs.
- Cutting in stands over 100 years old is strongly discouraged and should be avoided. Additionally, NWFP Standards & Guidelines delineate that old-growth fragments within Matrix LUAs should be retained as refugia for old-growth associated species with "limited dispersal capabilities," stating "It is prudent to retain what little remains of this age class within landscape areas where it is currently very limited."[9]

MA 1B, LSR (less than 80 years old), Semi Primitive, non-motorized LSR:

- MA 1B, Semi-primitive non-motorized is an LUA that was administratively withdrawn in 1990 LRMP and not scheduled for timber cutting[10]. Even if overlayed with an LSR LUA, these areas should not be part of this plan. No roads of any maintenance level should be permitted or planned for this MA. If there is a conflict between the 1990 LRMP direction and the NW FP direction, per the NW FP, the most restrictive direction shall be followed. This stricture clearly applies to roads and should also apply to any cutting.
- The EA should spell out the number of acres of MA 1B, LSR, Semi Primitive, non-motorized LSR within the project area.

MA 1C, LSR less than 80 years old), Semi Primitive, motorized LSR:

- MA 1C, Semi-primitive non-motorized is an LUA that was administratively withdrawn in 1990 LRMP and not scheduled for timber cutting[11]. These areas should not be part of this plan. No roads of any maintenance level should be permitted or planned for this MA. If there is a conflict between the 1990 LRMP direction and the NW FP direction, per the NW FP, the most restrictive direction shall be followed. This stricture clearly applies to roads and should apply to any cutting.
- The EA should spell out the number of acres of MA 1B, LSR, Semi Primitive, motorized LSR within the project area.

Recommended Scenic River MA 5B.

The scoping letter states that "evidence of timber harvest should not be noticeable from the river and appear natural when viewed from the river banks." We take exception to this interpretation and believe that the management prescription should to revised as noted below:

- Recommended scenic river corridor MA 5B is not suitable for scheduled timber production, thinning or otherwise. The EA for this project should reflect this clarification.
- Per the land use allocation map on the website, all of the MA5B in the PA is in the North Fork Nooksack river corridor. Most of this land is in a near natural condition. Management direction should retain this condition.
- Scheduled cutting in the river corridor is incompatible with the retention of not only primitive and undeveloped values (the desired and future conditions) but also the Outstandingly Remarkable Values (ORV's) of the North Fork Nooksack. Any

[9] ibid, p C-44.

[10] Final EIS Land and Resource Management Plan, Mt Baker-Snoqualmie National Forest, dated June 1990. pp 4-161 thru 4-163.

[11] ibid, pp 4-164 thru 4-166.

management action must result in maintaining and/or enhancing the ORV's for this river corridor that specifically include scenic, recreation, fisheries, wildlife, and historical cultural values.

- Any salvage and fuelwood cutting within the river corridor outside of Wilderness must be carefully controlled and monitored in order to achieve the desired future conditions as noted above.
- The clear evidence of past cutting in the Cascade River Corridor (see Section 7, T35N-R12E) after designation is an example that should not reoccur in the North Fork Nooksack.
- The EA should spell out the number of acres of MA 5B within the project area.

MA 15, LSR, Mountain Goat Habitat.

This LUA is administratively withdrawn from scheduled cutting under the 1990 LRMP. This MA is also recognized as 'administratively withdrawn' under the NW FP direction. It is unclear why MA15 is part of this plan.

- The 1990 LRMP states "No harvest scheduled. If timber management activities are conducted, practices applied shall be for the primary purpose of maintaining mountain goat winter habitat.[12]" If any vegetative manipulations occur in MA 15 clear evidence must be provided in the EA for the benefits that may accrue for mountain goats.
- The LRMP guidelines further direct that "No new roads permitted which access mountain goat winter habitat." This stricture clearly applies to all roads. Consequently, the EA should address the question of new roads associated with this MA.
- The EA should spell out the number of acres of MA 15, LSR within the project area.

MA 19 Mountain Hemlock Zone.

The 1990 LRMP called for the establishment of MA 19 and a study to test various silvicultural practices. No such study was undertaken, and we are concerned about a Forest Plan amendment that would mandate an increased level of development in the sensitive, high elevation areas characterized by MA 19. We believe any Forest Plan amendment should reflect the following:

- Scheduled cutting continues to be inappropriate for MA 19 and should be prohibited by Forest Plan.
- Non-commercial thinning activities should be extremely limited.
- No new roads should be constructed.
- Reconstruction of existing system roads, if closed or impassible, should be limited by the needs of that project. Such roads should be decommissioned at the completion of the project.
- The EA should spell out the number of acres of MA 19, LSR within the project area.

Summary of Proposed Treatments:

Commercial Thinning (CT)

[12] ibid, pp 4-234 thru 4-236.

The scoping letter provides a broad statement as to where commercial thinning (CT) may occur. The statement requires significant clarification and a reduction of scope.

- CT is prohibited in LSR stands older than 80 years. The EA should so state.
- CT is only appropriate in LSR stands 80 years old or less. The EA should so state.
- CT is not appropriate in an MA where timber harvest was not scheduled per the direction the 1990 LRMP, particularly MA15:
  - The Management Prescription of MA 15 specifically does not schedule timber harvest and severely limits vegetative manipulation to those activities that 'benefit mountain goats.'
  - Commercial thinning is intended to produce log volumes for manufacture and appears not to be appropriate for this MA as was foreseen in 1990. This management direction remains appropriate today.
  - No roads of any kind can be associated with MA 15 per the Prescriptions.
  - The EA should spell out the number of acres of LUA MA 15 associated with this project.
- The level of thinning suggested by the scoping letter is not appropriate in a recommended river corridor, MA 5B. Such logging will not retain existing natural characteristics or maintain and enhance river ORV's in the North Fork Nooksack corridor as required by plan.
- The EA should spell out the number of acres of LUA MA 5B associated with this project.

<u>Stand Improvement through non-commercial thinning:</u>

- MA 1B & MA 1C: The 1990 LRMP Management Prescriptions prohibit scheduled timber harvest for MA 1B and 1C. What possibly could be the rationale for doing *timber stand improvement* in an MA where timber harvest is not scheduled? Furthermore, the S&G's for these two MAs further state "The desired future condition: Areas are characterized by a predominately natural or naturally appearing environment generally free from evidence of sights and sounds of human activity…." This scoping letter appears inconsistent with current direction. Please adjust the direction for these MAs.
  - How will the desired future conditions be achieved by some human manipulation when the desired future conditions are "…characterized by a predominately natural or naturally appearing environment…"?
  - The EA should spell out the number of acres of LUA MA 1B, LSR and MA 1C, LSR associated with this project.
- MA 19 should not include the construction of roads of any maintenance level. The EA should disclose the method of access planned for this MA.

<u>Stand Regeneration</u>:

- Cutting in matrix MAs should be limited to stands 80 years old and younger, we agree with the scoping letter. Cutting in stands over 100 years old should be avoided.

Proposed Action:

Commercial Thinning (CT) within LSR:

- The scoping letter quotes the area of LSR stands less than 80 years old that will be thinned but provides no estimate of log volume to be produced. The EA must provide an estimate for the volume of logs that are projected to come from the following LUA. Specifically:
  - Within LSRs the EA should break out volumes for each LUA category: MA 15, LSR; MA 19, LSR; MA 1B, LSR; and MA 1C, LSR.
  - Riparian Reserve volumes should also be broken out by sub-LUA categories as well.

Non-commercial thinning:

- A precise description of the non-commercial thinning activity should be provided in the EA for MA 1B, LSR and MA 1C, LSR.

CT within Matrix.

- The EA must provide an estimate for the volume of logs that are projected to come from the matrix LUA.
- The EA should state if the resultant volumes from all components from this project will be offered in a single sale. If multiple sales are contemplated, then the time frame for offerings should be estimated and provided in the EA.

The EA should estimate the number of separate timber sales this entire project will be sold as if more than one sale is contemplated.

Project Specific Forest Plan Amendment

Since a formal study of the Mountain Hemlock Zone as called for by the 1990 Forest Plan has not been carried out, any amendment to MA 19: Mountain Hemlock Zone management direction should be carefully considered, and should reflect the following:

- Scheduled cutting continues to be inappropriate for MA 19 and should be prohibited by Forest Plan.
- Non-commercial thinning activities should be extremely limited.
- No new roads should be constructed.
- Reconstruction of existing system roads, if closed or impassible, should be limited by the needs of that project. Such roads should be decommissioned at the completion of the project.
- The EA should spell out the number of acres of MA 19, LSR within the project area.

Additionally, any forest plan amendment should be carried out fully in accordance with NEPA processes and full public involvement.

Road Connections:

It is surprising that the project description for the North Fork Nooksack Vegetation Management Project limits its discussion of roads to (1) the relocation of a segment of

Forest Service Road (FSR) 31 and (2) the replacement of Thompson Creek Bridge. Both of these project elements are described as necessary to maintain access to the National Forest land, which we agree is an important aspect to consider when looking at these road systems. Currently, the Mount Baker Ranger District is developing a separate project for road replacement, the Deadhorse Road Relocation Project. These two specific road projects being included in the North Fork Nooksack Vegetation Management Project should demand the same level of review as the Deadhorse Project rather than being wrapped into this landscape-scale project. For this reason, we request that the Road Connection on FSR 31 and the replacement of Thompson Creek Bridge should be broken out of this project into separate Environmental Assessments.

Roads:

Roads play a major role in the degradation of watersheds. The North Fork Nooksack Access and Travel Management Plan (TMP, 2016) highlights the challenge of maintaining a road system that is overbuilt and underfunded, and the repercussions of this chronic management challenge. Road failures due to undersized and/or blocked culverts, drainage and slope failures, and mass wasting events have deleterious effects on water quality for years. Per Watershed Analyses developed for the project area, including the North Fork Nooksack, the TMP confirms:

> Findings indicate that roads and road deterioration will negatively impact fish and fish habitat, wildlife and wildlife habitat, and change hydrology in watersheds. Specifically,
>
> - that without proper maintenance, roads would deteriorate and increase the risk of mass wasting or road related slope failures and sediment delivery to streams
> - without proper funding many of the system mileage are recommended to be placed in a low cost maintenance category or decommissioned
> - roads have the potential increased erosion and sedimentation effects on stream channels and aquatic habitat, and fragmented terrestrial habitats
> - that open roads and high-use trails have placed much of the terrestrial vertebrate habitat within a potential disturbance zone (1/3 mile from open roads and high-use trails)
> - habitat features are highly fragmented and discontinuous as a result of geography, roads and trails [13]

Instead, the scope of analysis within the North Fork Nooksack VMP with regards to roads must be redirected to address the shrinkage of the entire road system within the North Fork Nooksack Vegetation Management Project planning area in order to meet Aquatic Conservation Strategy (ACS) objectives *given a continued reduction in road maintenance funding for the National Forest*.

[13] Environmental Assessment, North Fork Nooksack Access and Travel Management Project, page 10-11.

The North Fork Nooksack River (W-114) is classified as a Tier I (Aquatic Conservation Emphasis) watershed per the direction found in NW FP Appendix B6[14]. This Tier I watershed makes up the majority of the North Fork Nooksack Vegetation Management Project (VMP) Planning Area since it contributes directly to the conservation of at-risk anadromous salmonids, bull trout, and resident fish species. The North Fork Nooksack VMP is expected to document all Aquatic Conservation Strategy requirements for the Planning Area, with a particular emphasis on this Tier I watershed, so that compliance with these requirements can be demonstrated for all projects that are subsequently proposed. No aspect of this Project should degrade habitat within the planning area.

The 1990 Forest Plan evaluated the condition of ninety-three watersheds across the Forest and rated them as either *acceptable* or *unacceptable*. Within the Project area the Canyon Creek watershed was rated as unacceptable.[15] **It is a requirement that** this Project will reevaluate all watershed conditions within the analysis area and only take actions that would result in all watersheds being rated at least *acceptable and that no degradation occur within the planning area*. However, the metric of '*acceptable'* is overly broad and gives little warning as to incipient degradation that could result in an *unacceptable* category. Therefore, this project should define a new and finer metric.

Sediment and temperature measurements need to be conducted on streams and rivers within the planning and should be added to the project description. Sedimentation and temperature are directly tied to watershed health. Limiting the numbers of streams crossed by road segments can reduce sedimentation from roads.

With nearly all of the planning area allocated as an LSR it is important to note that the standards and guidelines in the NW Forest Plan advise against road construction in LSRs unless the benefits are clear.[16] In this case, benefits mean benefits to the environment and the acceleration of late successional characteristics, and costs would mean any detrimental impacts to these goals. When costs exceed benefits, roads within LSRs should be avoided. In addition, the NWFP delineates that "alternative access methods, such as aerial logging, should be considered to provide access for activities in reserves" [17] Other methods of access to LSRs must be considered before road construction, including temporary roads, is allowed.

Within Land Management Allocation 15, Mountain Goat Habitat LSR, the Mount Baker Snoqualmie Forest Plan states that "Road density will average no more than two miles per square mile and no new roads will be built in Goat MR areas."[18] Therefore, any thinning

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[14] FEIS on Management of Habitat for Late-Successional and Old Growth Forest Related Species within the Range of the Northern Spotted Owl, Appendix B6 (pages B-81—B-128). See page B-91 and Table B6-3.

[15] Final EIS Land and Resource Management Plan, Mt Baker-Snoqualmie National Forest, dated June 1990. See pages IV-22-thru IV-24 and Table IV-4 (page IV-25).

[16] ROD, Amendments to Forest Service and Bureau of Land Management Planning Documents Within the Range of the Northern Spotted Owl, Aquatic Conservation Strategy, page C-16.

[17] ROD, Amendments to Forest Service and Bureau of Land Management Planning Documents Within the Range of the Northern Spotted Owl, Aquatic Conservation Strategy, page C-16.

[18] Final Environmental Impact Statement, Land and Resource Management Plan, Mt Baker-Snoqualmie National Forest, page 4-44.

(commercial or noncommercial) within MA15 must be carried out without any road building, temporary or otherwise.

In addition to the above-referenced considerations, and as a tool to meet the requirements outlined above, a primary element regarding the analysis of this project is the development of a Road Plan, including adequate mapping, which would delineate the roads to be utilized during the course of the project, as well as the future road network after the project has been completed.

The Road Plan should identify the roads that will be used for access and haul of any timber, including the decommissioning and obliteration of all temporary roads used for this project. Logging access should plan to use only (1) existing Open Roads (Maintenance Levels 2-4), and not Closed Roads (ML1), and (2) Temporary Roads to access vegetation management and other activities. Of great concern is the extent to which Closed Roads could be reopened, utilized, and reclosed, and the extent of the use of Temporary Roads, in particular Temporary Roads with stream crossings and that are located within Riparian Reserves and Aquatic No-Cut areas. All Temporary Roads that are "new" and are not reconstructed existing segments must be obliterated as part of the final Project's Road Plan including those segments that were considered previously as "temporary roads" and "non-system roads."

Additionally, since most of the Project area is within an LSR (RW111)[19] whose long-term management directs no entry for stands 80 years old and older, this Project must provide a Road Plan that shows how *roads will be sequentially abandoned as stands reach 80 years old*. At the end of this project's term, any stands that will then be 80+ years old should be considered closed to further entries per Northwest Forest Plan direction, and any roads in those stands should be planned for decommissioning as part of this project. Younger stands might need additional entries in the future to perform treatments. We request the Forest Service should use this project to plan for decommissioning roads that only access stands aged greater than 70 years old. This would result in the closure of Maintenance Level (ML)1 and ML2 roads that can be permanently decommissioned and removed from the road network. Therefore this Project, at a minimum, must commit to decommissioning certain roads in the near term and must document incremental stand ages in the range of 50-75 years old so that the Road Plan may be fully assessed for consistency with NW FP direction.

We are also concerned about potential daylighting of haul routes. We are concerned with the extent that any daylighting would remove the overhanging hardwoods near the road edge and the also the removal of hazard trees without specific and reasonable definitions. This project description must clarify the extent of the daylighting in the immediate vicinity of road corridors. We refer you to discussion on this topic we have had with the Darrington District Ranger. In general, avoid cutting any trees over 80 years old in these corridors. A full discussion of daylighting, including text that more fully describes our concerns and proposed language, was developed with the Darrington Ranger District, the text of which can be provided. Daylighting of haul routes should be a function of the maintenance level

[19] Forest Wide Late Successional Reserve Assessment, Mt Baker-Snoqualmie National Forest; USDA Forest Service Pacific Northwest Region; dated September 2001. See Figure 1-2.

of the roads. Daylighting and/or hazard tree removal should not occur on any temporary roads, closed roads, or ML1 or ML2 roads. Daylighting on open roads should be focused on maintenance level 3 or higher.

We appreciate the opportunity to comment on this significant project during the scoping phase. The scale of the project, the sensitivity of the lands and waters in the project area, and the duration of the plan require a close analysis of any proposed actions, with plenty of input opportunities from interested parties. Please keep us on the mailing list and informed of future developments.

Sincerely,

Nete Olsen
National Forest Committee
Washington State Chapter
Sierra Club