



June 29, 2020

Erin Uloth, District Ranger
Mt. Baker Ranger District
810 State Route 20
Sedro-Woolley, WA 98284

Re: North Fork Nooksack Vegetation Management Project - Scoping

Dear District Ranger Uloth,

WildEarth Guardians respectfully submits these comments to the U.S. Forest Service in response to the agency's scoping notice letter for the proposed North Fork Nooksack Vegetation Management Project. The project includes actions that aim to improve forest conditions and maintain access, such as:

- 1,798 acres of commercial thinning in LSR (537 acres in Riparian Reserves)
- 2,054 acres of non-commercial thinning (581 acres in Riparian Reserves; 271 acres for huckleberry enhancement)
- 1,1881 acres of logging in matrix (575 acres in Riparian Reserves)
- Re-route a portion of Canyon Creek Road (FSR 31) – including trails: hiking, mountain biking, paddling
- Bridge replacement over Thompson Creek on FSR 39 – hiking, scenic viewing, alpine and ice climbing, paddling

The project is located 2 miles east of Glacier, WA in the Canyon Creek and Thompson Creek subwatersheds, which drain to the North Fork Nooksack River. This watershed is recognized as a Tier 1 key watershed in the Northwest Forest Plan and is important for native fish as well as marbled murrelet, spotted owls, Pacific fisher, mountain goats, wolverine and possibly even grizzly bear. Thus factors impacting watershed health should be addressed.

WildEarth Guardians is a nonprofit conservation organization with offices in Washington, Oregon and five other states. WildEarth Guardians has more than 300,000 members and supporters across the United States and works to protect and restore wildlife, wild places, wild rivers, and the health of the American West. WildEarth Guardians and its members have specific interests in the health and resilience of public lands and waterways. Please add our name and organization to the contact list to receive any future public notices regarding this project.

We understand that in the “scoping” stage of the National Environmental Protection Act (NEPA) process, the Forest Service provides a general overview of the project to solicit early input. Though

this project is largely a vegetation management project, we are particularly interested in the project components that address water quality, aquatic habitat, improve watersheds and ensures forest resiliency. As you move forward with refining the project and completing your analysis, we encourage you to consider all actions through the lens of aquatic health.

1. The Forest Service has a duty to ensure water quality and salmon habitat are protected.

We realize this is scoping but we would be remiss if we did not acknowledge the vital role that National Forests play in ensuring rivers and streams remain clean, cold and are adequately protected. The agency was created, in part, to protect our Nation's water supply. Salmon species in this area include Chinook, coho, chum, pink and sockeye as well as steelhead, bull trout and cutthroat. The Forest Service has a responsibility to ensure the recovery of species that are listed as threatened/endangered via the Endangered Species Act. Not only should critical fish habitat be protected but actions on Forest Service lands should contribute to habitat improvement and restoration.

According to the "Salmon and Steelhead Habitat Limiting Factors in WRIA 1, The Nooksack Basin" report of July 2002, sedimentation resulting from high road densities and landslides (from both timber harvest and roads) has a considerable impact to salmonid spawning habitat in the Nooksack Basin.

"The North and Middle Fork Nooksack Rivers have a naturally high sediment load due to glacial inputs. However, human-caused sedimentation is considerable. ...An estimated 632 landslides have been documented in the North Fork Nooksack sub-basin." (p. 14)

Recommended actions include (p.275):

- "Decommission or treat roads that are at a moderate to high risk of mass wasting potential in the North, South, and Middle Fork Nooksack sub-basins.
- Decommission or treat orphan roads that are at a moderate to high risk of mass wasting potential."

Sediment delivery to streams is one of the key contributing factors that impact aquatics. The Forest Service has developed a Geomorphic Road Assessment and Inventory Package (GRAIP), which can help pinpoint locations of sediment delivery to streams. In addition, the WA State Department of Natural Resources has done extensive analysis of landslide potential. We encourage the Forest Service to use these types of tools to compare differences between project alternatives to better understand how potential actions may or may not lead to improvements across the landscape.

The USFS has also consistently worked to improve aquatic habitat and watershed conditions, most recently under the "Watershed Condition Framework." The roads/trails indicator is rated "poor" in Canyon Creek. This indicator is based on four factors: open road density, road/trail maintenance, road proximity to water and mass wasting. The agency has a duty to continuously work to improve watershed conditions and in order to do so these factors must be addressed. The scoping notice makes no mention of this.

We understand that the agency is planning to re-route Canyon Creek road, which should not only improve the reliability of access to popular recreational destinations in that corridor but also has the

potential to reduce sediment delivery to Canyon Creek from a chronically unstable area. We would expect the agency to be diligent in the design and location of the reroute (i.e. ensure habitat and use areas for threatened species are not impacted) but also in the restoration/reclamation of the abandoned route to ensure impacts to aquatics are reduced.

We do support actions that improve passage so fish can migrate up/down stream unimpaired – particularly undersized culverts and the proposed bridge replacement on Thompson Creek. Replacing this bridge not only improves safety and access to recreational destinations but should improve aquatic habitat conditions. Project actions should not only avoid further impacts to salmon and water quality, but should be developed to be inline with existing salmon recovery plans.

2. As part of the analysis of the North Fork Nooksack Vegetation Management Project under NEPA, we expect the Mt. Baker-Snoqualmie National Forest to incorporate decisions from the Nooksack Access and Travel Management Plan (ATM) and Sustainable Roads Strategy (SRS).

The Forest Service has limited capacity to complete NEPA multiple times in a watershed, thus we ask that the agency really take a hard look at all of the roads that are in this project area, particularly in the watersheds that are in poor condition due to the road system. The ATM and SRS were developed as blueprints to help guide the agency to identify and implement a minimum road system that is ecologically, economically and socially sustainable. Though that “minimum road system” has not yet been identified forest-wide, the analysis and previous decisions should be incorporated. In addition, updated information and field verification should be included to fully harness opportunities to implement the ATM and also reduce/eliminate impacts to aquatics from the road system.

As you know, an excessively large road-system is a financial liability for an agency that continues to see its budget reduced by Congress. Even when a road is not-driveable, it still remains a liability to the agency. This is why it’s extremely important to focus limited maintenance dollars towards roads that people use for access and decommission roads that are no longer needed and causing harm to natural resources. Both the ATM and SRS identified roads needed for access and roads that were no longer needed. The existing road network has detrimental impacts to watershed health that must be fully addressed in any project that moves forward.

Questions that could be addressed include:

- Will any components of the ATM or SRS be addressed with this project?
- Do the road maintenance and reconstruction activities proposed minimize adverse environmental impacts?
- Are the aquatic risks identified with ALL the roads in this project area addressed with any road-related actions? If so, how?
- Why are there no roads identified for decommissioning?
- How is road density impacting aquatic and terrestrial wildlife?
- Given the major cuts in road maintenance funds over the last decade, how does the agency prioritize recreational access roads for maintenance versus timber access roads?

As stated previously, one option is to consider sediment delivery to streams, which is one of the key contributing factors that impact aquatics. The Forest Service has developed a Geomorphic Road Assessment and Inventory Package (GRAIP), which can help pinpoint locations of sediment

delivery to streams. We encourage the Forest Service to use this type of tool to compare differences between project alternatives to better understand potential improvements across the landscape.

Other forests have included maps and/or tables that highlight road information from previous analysis (like your ATM and SRS) such as aquatic risk, access need, current condition, field notes, roads that are not driveable, operational maintenance changes, etc. This makes it easier to understand the linkages between previous work and to see where further attention may be needed to reduce ecological impacts.

Other forests have included roads in their purpose/need statements because it is nearly impossible these days to ignore the impact of the road system or the need to improve standards before they can be used. With the compounded deferred maintenance needs, along with recreational and tribal access needs, excess storm damage and inability for current road systems to handle heavy equipment traffic, it seems that any project no matter how big or small must incorporate roads.

3. The Mt. Baker-Snoqualmie National Forest should avoid using temporary roads, especially those located near the boundaries of wilderness and inventoried roadless areas. If avoidance is impossible, they should be immediately reclaimed after use.

We expect to see the minimal development of temporary roads in this project. Though the common assumption is that proposed temporary road beds will be restored to natural condition after the project, there is still an impact when temporary roads are developed. We encourage the project staff to take a thorough look at any proposed temporary roads and be certain that they are needed. In addition to their hydrologic impact, roads fragment habitat, disturb wildlife, invite more noxious weeds and increase fire danger. Additionally, if they are not properly rehabilitated post-project, they can invite illegal incursions and more damage to natural resources. At minimum, we ask that the Mt. Baker-Snoqualmie National Forest restore these segments as soon as the project activities are completed. In addition, we ask that the segments be monitored and enforcement actions taken to ensure proper closure.

4. Ensure climate change impacts are acknowledged and addressed.

It is also important to note that, with a changing climate, and the science we do know about changes in local conditions, the agency has a duty to evaluate known information and analyze how the project will or will not lead to forest resilience. For example, climate change intensifies the adverse impacts associated with roads. As the warming climate alters species distribution and forces wildlife migration, landscape connectivity becomes even more critical to species survival and ecosystem resilience. Climate change is also expected to lead to more extreme weather events, resulting in increased flood severity, more frequent landslides, altered hydrographs, and changes in erosion and sedimentation rates and delivery processes. Many National Forest roads, however, were poorly located and designed to be temporarily on the landscape, making them particularly vulnerable to these climate alterations. And even those designed for storms and water flows typical of past decades may fail under future weather scenarios, further exacerbating adverse ecological impacts, public safety concerns, and maintenance needs.

In the Draft EA, we recommend you consider climate change impacts and adaptation recommendations. We would like to see which roads are prioritized for storm-proofing, particularly as they relate to accessing important tribal areas, recreational destinations and/or have known water

quality impacts. In addition, we would like to see where undersized and vulnerable culverts (or bridges) are to be replaced since this is essential to protect roads from blowing out during storms. New culverts and bridge spans are large enough to not only ensure fish passage but will also handle higher flow events, reducing costs in the long run. Proper maintenance and storm-proofing of roads should be evaluated and prioritized, which will have positive benefits not only for ensuring access but also for protecting natural resources.

Colder refugia in streams will also become increasingly important so it is vital that riparian reserves be protected and any potential impacts to water and salmon be thoroughly analyzed and avoided.

Conclusion

As conservationists and visitors to the Mt. Baker-Snoqualmie National Forest, we appreciate the work that you and your staff do to ensure public lands and waters are protected and restored for wildlife, water and current/future generations. We realize that this is the scoping stage and there will be more details forthcoming, but know that we are keenly cognizant of the role of forests in salmon recovery and ensuring clean water. The actions proposed and decided upon will chart the direction of this watershed for years, thus we strongly encourage you to do this well.

If you have questions, please contact me.

Sincerely,



Marlies Wierenga
Pacific NW Conservation Manager
WildEarth Guardians
P.O. Box 13086
Portland, OR 97213
mwierenga@wildearthguardians.org