



State of Washington
Department of Fish and Wildlife

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July 2, 2020

Erin Uloth, District Ranger
United States Forest Service
Mount Baker Ranger District

Subject: North Fork Nooksack Vegetation Management Project

Dear Ranger Uloth,

Washington Department of Fish & Wildlife is pleased and encouraged by the general intent of the North Fork Nooksack Vegetation Management Project to use progressive forest management to improve forest health and ecosystem quality for the benefit of forest dwelling creatures and the health of aquatic resources in light of the legacy of past forest practices and the imminent effects of climate change. We have concerns that the actions as described in the scoping document may have detrimental impact that will not be overridden by the stated ecosystem benefits. We encourage the USFS to be careful and comprehensive when assessing the environmental impacts of the proposed actions. Our specific comments follow;

- The legacy silviculture practices conducted in the forest during the last century is evident in the dense monocultural forests, devoid of the complexity observed in naturally occurring forests. This legacy does not fare well for many of the forest's native plant and animal species, and in some cases provides a foothold for nonnative, and often undesirable, species.
- Forest stand thinning will likely result in healthier more complex stand conditions, that will improve ecological services for the forest's native plants and animals.
- A more diverse, mature, & healthy forest mosaic will be more effective at resisting disease, insect infestations, and catastrophic forest fire.
- Special designation and treatment of riparian areas can help to maintain and improve the unique ecological qualities and benefits these areas provide for terrestrial and aquatic biota. It is worth noting that the intense forestry practices of the past have left the North Fork Nooksack River close to devoid of significant large wood assemblages; this should be considered when planning forest management within riparian areas.

While WDFW supports progressive management of the National Forests, the scoping letter does not adequately describe how the management will be applied and the specific benefits or possible detriments to species or habitats. The proposed assessment should be careful to comprehensively describe management actions. The following are suggestions that could be considered when drafting the assessment;

- Proposed treatments should be comprehensively described with specific objective requirements.
- As they are described in the scoping document, some of the proposed actions (treatments) could be interpreted as allowing clear cutting in areas that it is not explicitly planned. Also, some of the

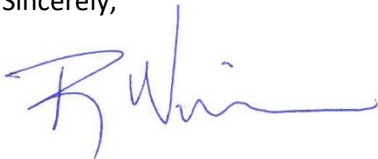
scoping materials describe a 40 acre upper limit to cleared area, this is not described in the scoping letter. The actions described in the project scope and displayed on the planning maps should be thoroughly and comprehensively described.

- “Riparian Reserve” is briefly described in the document but it is not specific and not displayed on the maps provided.
- Riparian Reserve standards and guidelines should be clearly stated and referenced.
- Each of the allocations should be clearly described with specific reasoning for which treatment is allowed.
- The language of the assessment should be absolute and not contain verbiage that allows for subjective interpretation.
- While the document specifically prohibits timber harvest in mountain goat habitat (LSR 15), another section of the document calls out the area for commercial thinning and timber harvest. The assessment should be well reviewed to eliminate confusing and contradictory language.
- The assessment would benefit from in situ photos of specific forest issues and examples of the treatments proposed.
- Clear, consistent, and common language should be used when describing proposed treatments in order to accurately convey their meaning.
- WDFW agrees that there is a “need” for restoration of the landscape as described in the scoping document. The assessment should provide clear and comprehensive objectives for restoration benefits.
- There should be a restoration strategy and a restoration plan with identified actions that will result in the achievement of objectives.
- Restoration planning should include benefits to aquatic species; these species have been significantly impacted by the legacy of past forest practices that have resulted in, among other things higher sedimentation and the loss of stream complexity.

Again, WDFW is encouraged by the ecological improvement objectives of the project. Upon review, it appears that the brief scoping document leaves some information up to subjective interpretation, hopefully the upcoming assessment will be more specific and comprehensive. The management described in the project scope seems to be a clear departure from how the Mount Baker Snoqualmie National Forest has been managed in recent decades. It appears that there will be significant changes to the Forest Plan & Regional Guide, and for this reason we feel that a comprehensive environmental impact statement (EIS) is appropriate.

Thank you for the opportunity to provide these comments, we look forward to reviewing your continued work on this project. Do not hesitate to let us know if you need technical assistance for fish and wildlife issues.

Sincerely,



Bob Warinner
Assistant Regional Habitat Program Manager