

Dear District Ranger Uloth:

North Cascades Conservation Council was founded in 1957 to protect the North Cascades. Since our inception we have been involved in forest management issues on the Mount Baker-Snoqualmie. We would like to supply the following concerns to your request for comments on the scoping documents for the " North Fork Nooksack Vegetation Management Project".

The proposed project is quite large, involving significant disturbance over almost nine square miles. It represents a big departure from land management practices over the last thirty years. The Mount Baker Ranger District has not had a timber sale of any size in decades, and over the entire forest, effectively no clear-cutting has been conducted for an equally long time. The proposed impacts are concentrated in the moderate-sized watershed of Canyon Creek, and cover a high fraction of the most productive lands in the basin. Projects of this scale and potential adverse impact should require an EIS.

The aquatic impacts of this much logging, and the attendant construction of "temporary" roads, landings, and skidder tracks, cannot be anything but bad. The scoping materials make no mention of the miles of new road required or the surface area affected, but we can be sure it would be significant. Logs rarely float themselves out of the forest without roads and yarding damage.

The scoping notice states that "Stand regeneration", a.k.a. clear cuts with perhaps a few leave trees, would occur over "up to 1881 acres (575 in Riparian Reserve)". A comparison of figure 1-5 in the Canyon Creek WSA with the green units on the scoping map strongly suggests that the Riparian Reserve fraction of these matrix clear-cut units is not a third but more like two-thirds or three quarters of this three-square mile area. We suggest that the ID team responsible for this proposal refresh their memory regarding the Northwest Forest Plan standards and guidelines for Riparian Reserves. Standard TM-1 prohibits "timber harvest, including fuelwood cutting, in Riparian Reserves", with exceptions for circumscribed salvage logging following catastrophic events, and to "Apply silvicultural practices for Riparian Reserves to control stocking, reestablish and manage stands, and acquire desired vegetation characteristics needed to attain Aquatic Conservation Strategy objectives." Clear-cutting in Riparian Reserves does not promote the attainment of ACS objectives. A reasonable reading of these guidelines is that you are not permitted to do what you are apparently proposing to do, which is to conduct "regeneration harvest" over a square mile or two of Riparian Reserve. In fact the Canyon Creek WSA authors agree: "Much of the federal land in the watershed that was previously in management areas that would allow some timber harvest has been allocated to LSR or Riparian Reserve. No regeneration or scheduled harvest is permitted in these areas." (Canyon Creek WSA, p.167)

The scoping notice also proposes a new ML3 system road about 2/3 of a mile in length connecting FS 3120-035 and FS 3132. The proposal is actually significantly more impactful than 2/3 of a mile of new roads, since the system roads on either side of the gap are formally and informally storage roads without current motorized use; in effect these are upgraded from ML1 to ML3. The proposed new road alignment is within LSR, and appears to cross Riparian Reserves. The Canyon Creek basin is a Tier 1 key watershed. You are generally directed to "Reduce existing system and nonsystem road mileage" within Key watersheds (NFWP standards and guidelines, p. c-7). The proposal makes no mention of offsetting reductions in system roads to compensate for what amounts to a significant increase in system road mileage. We don’t believe that preserving uninterrupted motorized access up Canyon creek is of sufficient value to make what is in effect a “spare” road. In fact putting it in those terms makes clear what a ridiculous idea it is. The conventional approach to such a problem is to re-align or re-engineer the main road, FS-31, so that it doesn’t fail so often. The proposed spare road, probably twice the length of the corresponding stretch of FS-31, and with more than a thousand feet of adverse grade, does not seem like a route which could stand much traffic.

We note that a very high proportion of the commercial thinning proposed for LSR allocations in both Canyon Creek and the North Fork Nooksack basins is stream-adjacent in Riparian Reserves. How much mileage of "temporary" roads would this entail and how much surface area in these zones would be turned into landings? We think the correct answer is "zero: and "none". Over the years we have looked at many commercial thins on west-side national forests, and not seen a single one which did not remove a lot of biomass, homogenize and simplify stands, and generally move them away, rather than toward, "late-successional conditions". These concerns are amplified when LSR commercial thins are conducted in Riparian Reserves.

We are also dubious about conducting huckleberry-farming projects in LSR. This is clearly not an appropriate activity in this allocation. Make a "project-specific" plan amendment as a get-out-of-jail-free end run pretty much negates the purpose of having a plan. What use are rules and guidelines if you can ignore them whenever they are inconvenient?

The scoping notice does not mention climate change. It is becoming clear that some wet west-side forests have large potential as low-cost, low-effort carbon sinks. (see, e.g. Buotte, et al.', "Carbon sequestration and biodiversity co‐benefits of preserving forests in the western USA" ).

The EIS for this project should discuss the effects of this project on carbon storage.

Sincerely,

Phil Fenner

President, NCCC