

North Fork Nooksack Vegetation Management Draft EA Comments

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Please consider these comments for the North Fork Nooksack Vegetation Management Project (NFNVMP). I am still opposed to this project and I am disappointed that the Forest Service did not include a “no action” alternative. Given the acceleration of climate change, the no action alternative is warranted. Forced to choose between the two alternatives presented, I support Alternative Two (Variable Density Thinning) and reject Alternative One (Variable Retention Harvest). At its core, Variable Retention Harvest is clear cutting with random islands of trees retained. This does not accelerate a stand towards late seral status. How can it? The majority of any given unit is denuded and restarts the stand from scratch. After 40-60 years, the preserved islands of trees will be much taller but the remaining portions of the unit will now be the same height as the year that VRH was applied to the stand. You are effectively right back where you started.

1. Climate Change

A 2015 U.S. Forest Service report found that the Mount Baker-Snoqualmie National Forest was second only to the Willamette National Forest in terms of total carbon storage for all national forests within the Pacific Northwest¹. The stands proposed for treatment in this project are not considered late-successional / old-growth in terms of their age or structure, they are mature second growth and no doubt accelerating in their ability to capture and store carbon. The EA analysis does not consider the impact of losing the carbon sequestration benefits of the stands proposed. Your rationale for project-scale climate effects implies that forestry contributes the least to greenhouse gas emissions but this is not true. A 2017 study by the Center for Sustainable Economy found that timber harvesting was the leading source of greenhouse gas emissions in Oregon and, in fact, emits more carbon than residential and commercial sectors combined². Their study goes further to highlight other research (including that done by the Forest Service) that illustrates somewhere between 60-80% of the carbon sequestered by trees is released back into the environment during the conversion from standing trees to finished wood products.

For this reason, I do not accept the Forest Service’s assertion that this project’s impacts are negligible. This project is targeting stands that are entering the prime era of carbon sequestration and you have done no analysis as to the benefits of leaving these stands versus removing them. President Biden’s Executive Order dated January 27, 2021 directs federal agencies including the Department of Agriculture to make action on climate change a priority. Within the Mount Baker-Snoqualmie National Forest, that should begin here with canceling this project.

2. Silvicultural Report

Under both Reforestation sections of Alternative 1 and Alternative 2, it states:

“Any resulting regeneration would create a complex structure that is desired in LSR to create a complex multi-storied structure desired for the development of late successional habitat. The resulting

regeneration from variable density thinning in matrix would be thinned through multiple cutting cycles until the stand is fully regenerated at the end of the rotation.” (Page 22, page 26)

How can you achieve late successional habitat if you are constantly cutting it, with the specific intent to “fully regenerate” (clear cut) the stand? Each time you enter the stand to thin, you will produce incidental damage to adjacent trees and understory, along with soil compaction.

3. Paleontological Resources

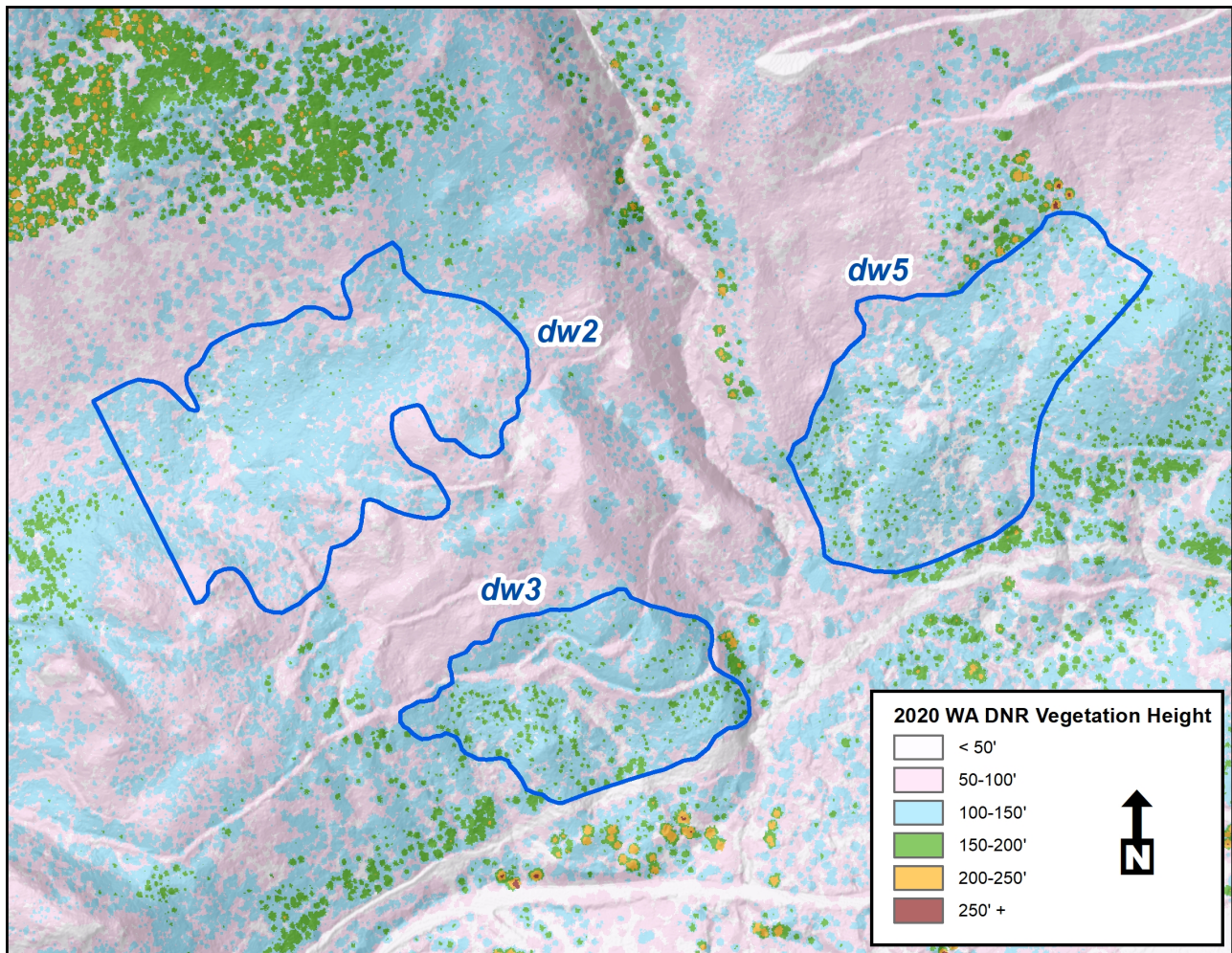
At least one portion of project area contains Paleontological Resources and the Forest Service must protect those resources under a 2015 rule (Paleontological Resources Preservation Rule³). I’m including a couple photos taken in 2010 as examples from the location in question. I will not detail the location’s specifics here in my public comments in order to protect these resources but I will share that information in follow up conversations with Forest Service staff.



4. Deadhorse-Wells Units

While none of the proposed units in the project are old growth, I do feel that three Deadhorse-Wells Units should be removed from the project due to their specific qualities. Specifically, I am referring to units DW2, DW3, & DW5. They are within the Late-Successional Reserve Land Use Allocation, within NSO critical habitat, and physically adjacent to older stands of trees allowing for connectivity. The units also possess multiple layer canopies. This is especially true of units DW3 and DW5 which have a broad and consistent two layer stand composition.

Here is 2020 Washington Department of Natural Resources Vegetation Height Data of this three unit area:



Literature Cited in these Scoping Comments:

1. USDA Forest Service. 2015. *Baseline Estimates of Carbon Stocks in Forests and Harvested Wood Products for National Forest System Units*; Pacific Northwest Region. 48pp. Whitepaper.

<http://www.fs.fed.us/climatechange/documents/PacificNorthwestRegionCarbonAssessment.pdf>

2. Center for Sustainable Economy, 2017. *Oregon Forest Carbon Policy: Scientific and technical brief to guide legislative intervention*. 44 p.

<https://sustainable-economy.org/wp-content/uploads/2017/12/Oregon-Forest-Carbon-Policy-Technical-Brief-1.pdf>

3. Paleontological Resources Preservation Rule, 2015. National Register

<https://www.federalregister.gov/documents/2015/04/17/2015-08483/paleontological-resources-preservation>