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Comments: North Fork Nooksack Vegetation Management Project #58218-Draft Environmental Assessment

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Date 4/4/2021

Thank you for the opportunity to provide comments on the North Fork Nooksack Vegetation Management Project #58218.

I support the need for thinning second growth stands in the North Fork Nooksack River Watershed.

Previous Comments

Previously provided scoping comments on public scoping for NICE in writing and at the Kindle Community Center. I also provide comments on scoping for the North Fork Nooksack Vegetation Project. In addition I provided documentation to Brian Hindman, FS Transportation Engineer on the proposed relocation of Canyon Creek Road 31 which was dropped as part of this project scoping.

Comments

Why aren't the second growth stands Deadhorse Road No 37 , North Fork Nooksack , Boyd Creek and West side Wells Creek Road NO 33 not being considered. Answer I got verbally is FS is not considering wildlife thinning needs. Yet in many cases in the draft EA the thinning prescription being discussed are for elk. That is a huge inconsistency. This suggest that you are proposing Grizzly Bear Recovery by selecting Elk as the desired wildlife animal. U S District Judge Mendoza Jr. dismissed the need to target Grizzly bear recovery in the North Cascades in recent determination for adjacent Okanogan Wenatchee National Forest thinning and culvert replacement. The Interior Department recently canceled plans to reintroduce grizzly bears to the North Cascades. No grizzly has been confirmed on the US side of the border in the region since 1996. Mendoza also said there wasn't any new information about grizzlies' that would require the Forest Service to formally consult with the US Fish and Wildlife Service. The propose of these action is to restore healthy stand function which currently isn't the case. Road maintenance is heavily impacted by lack of healthily stands. Several years ago literally hundreds of fir and hemlocks fell across Canyon Creek and volunteers had to cut through and cleanout the ditches from that event. FS had no money to do any maintenance. Over the last several years tree throw has been reflect intensity of winter storms and the poor health of these old clear cuts units. Employing good thinning techniques to the existing old unit condition are important to deal with over crowding and poor health of existing stands and not for a political agenda.

I feel its totally misleading to to leave out Hedrick Creek -North Fork Nooksack and Glacier Creek sub Watersheds for thinning considerations. The focus of this undertaking is to improve, and restore healthy stands in the old clear cut units. These old units are prime opportunities to do just that.

The Hurst Creek area that crosses Canyon Creek No31 is of stability concern and has had a history of landslide failure dating back to 1962 when the entire roads flushed out. Since that time the right bank of Hurst creek has failed due to saturation and stream channel undercutting. Thinning management in the upper bench areas is certainly doable but understanding of the hydraulic condition is important to not trigger additional channel bank failure which end up in the North Fork Nooksack.

I find it disheartening that FS chose not to talk or distribute information as indicate it would in its news bulletin of Oct 2020. It would be most helpful in understand the motives behind preselecting the suggest treatments.

Especially learning why certain areas are going to be left untreated by not being considered. Also why not selective thinning that promotes large tree development by removing small weaker trees. High tree stem density is very prone to wind throw. The application of thinning to develop large trees was demonstrated in the last Sale in Glacier call the Loretta Timber Sale done in the 1990's. It a good illustration of what can be done, and it located along the Canyon Creek Road No 31 below the 2.5 mile. Treated units are done between untreated stands and illustrates what is possible with this Basin thinning proposal.

Its also hard to understand why key citations are not listed in the draft EA . Since FS hasn't giving physical examples of treatments, citations are key for understanding the stand treatment being proposed. Citations for treatment are not in Appendix C Reference section.

Thank you,
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