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Organization: North Cascades Conservation Council

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Comments: Dear Greta and Andrew:

Since 1957, the North Cascades Conservation Council (NCCC) has worked to protect and preserve the North Cascades' lands, waters, plants, and wildlife through public participation and legal channels. We actively support expanding the North Cascades National Park, establishing new Wilderness Areas, protecting wildlife, promoting environmentally sound recreational use in wild areas, and protecting old-growth forests. We take action to stop damaging timber sales, while supporting responsible forest management and protecting forestlands from conversion to non-forest uses. We are an independent, all-volunteer organization whose work is carried out by our board and 200 members. We accept donations but no sponsorships, in order to maintain our independence.

NCCC takes keen interest in the euphemistically-termed North Fork Nooksack Vegetation Management Project, which we are convinced would be an ill-advised and unpalatable shift in the Forest Service's management priorities on the Mount Baker Ranger District. Implementation of this project as currently proposed in the draft EA would mark a sea change in the natural and human environment of the upper North Fork Nooksack basin, ushering in a multi-year period of industrialization and concomitant disruption not seen in these parts since the 1980s. This proposal is in direct opposition to the preferences of a vast majority of Whatcom County residents and officials, as well as those residing up and down the I-5 corridor. These community preferences were amply expressed during the scoping period for this project, though the Forest Service has thus far opted to largely ignore them. This strongly suggests to locals that the Forest Service is a retrogressive and callous neighbor, impervious to public appeals, beholden to extractive commercial interests, and has forgotten whom it works for.

Page 5 of the draft EA introduces the gaslighting that the Forest Service will apparently rely on in order to push nearly 3,000 acres of logging through the resistance of an unwilling public. The agency purports that there is need for more habitat for the ESA-listed northern spotted owl and marbled murrelet, though this project would remove copious amounts of forest cover for decades to come and newly fragment forest stands via "temporary" road construction. It suggests that conditions within Riparian Reserves would be improved, when in fact project activities would threaten mass wasting events, with potential devastation of Canyon Creek in particular. It states that the landscape would become more resilient to major disturbances, when in fact the removal of forest cover and construction of roads would increase fire risk, windthrow, and invasive weed spread. The draft EA laughably points toward a need for more ungulate forage, when adjacent private and state lands to the west feature early seral acreage well beyond the pre-European settlement baseline. And it further implies that the project would boost the local economy, ignoring data demonstrating that the outdoor recreation industry (which would be directly hindered by this project for up to 15 years) outpaces the forest products industry in terms of dollars generated, along with a 2:1 ratio in jobs per the State of Washington.

NCCC requests inclusion of an impartial, objective economic analysis that weighs the anticipated impacts to Whatcom County's outdoor recreation and tourism sectors as a result of the 10- to 15-year period of industrialization of the North Fork Nooksack basin that would come about via this project, relative to impacts to the county's forest products sector.

Beginning on page 7 of the draft EA ("Proposed Action and Alternatives"), the narrative states that "the effects of differing silvicultural treatments and outcomes in stand trajectory are markedly different between the two alternatives." This is simply untrue and flies in the face of the descriptions of the alternatives which follow. Both alternatives would involve logging across comparable amounts of acreage, approaching 3,000 acres; though whereas Alternative 1 would feature larger clearcuts ("variable retention harvest") on Matrix land and somewhat larger trees logged within LSR, Alternative 2 would instead allow only smaller clearcuts ("gaps") on both Matrix

and Late Successional Reserve acreage. Heavy commercial thinning would fill in the rest for both alternatives. Road construction and reconstruction across both similarly does not differ appreciably. The distinct similarities of these two alternatives confirm that the Forest Service has not considered a suitable range of alternatives for this project and, notably, has disregarded the wishes of a large majority of the 1,000-plus public comments received during scoping.

NCCC recommends an action alternative encompassing drop-and-leave "precommercial" thinning where accessible from the existing road network, a small demonstration project of huckleberry enhancement, repair of trunk road trouble spots with decommissioning of the remaining mileage, and replacement of the Thompson Creek bridge; along with quantification of the area's carbon sequestration capacity via elimination of commercial logging on the Mount Baker Ranger District (as has been floated by the Forest Service itself in the past).

As described on page 10 of the draft EA and elsewhere in the document, the Forest Service proposes an exemption for logging of trees up to 26" in LSR under Alternative 1, ostensibly for an arbitrary "treatment objective of 35% of SDI max" (page 17 and elsewhere). The presence of such vigorous trees in stands less than 80 years of age is a prime indicator that the stand in question is already developing along a desirable trajectory. Extraction of such trees contradicts the overarching goals of LSR zoning, and rather plainly suggests that the Forest Service's intent here is not to manage for old-growth characteristics, but for sawlog volume. This is the equivalent of a dieting individual justifying a few extra sugary desserts for motivation to stick with the original diet regimen. It's an absurd proposal, makes a mockery of LSR goals, and NCCC strenuously objects to this proposed exemption.

Page 13 of the draft EA states that nearly 20 miles of temporary road construction would be included in this project. The Forest Service blithely states that this mileage would be decommissioned following completion of the project, though makes no mention in the document that most hydrologic and soil damage associated with temporary roads occurs during the initial window of their construction and haul use. There is similarly no mention of how these travel corridors will be satisfactorily put to bed on a National Forest that receives a tremendous amount of 4-season visitation. As the Mount Baker Ranger District discovered during the Nooksack ATM process, every obscure road spur has a constituency, and it is a certainty that so-called temporary roads constructed for this project will be immediately "adopted" by a variety of user groups (especially motorized enthusiasts, target shooters, dispersed campers, etc.). The document does not adequately explain how this will be prevented, suggesting instead that the Forest Service will follow through with routine, inexpensive decommissioning procedures and then wash its hands of what comes next.

On page 16, describing the environmental consequences of silvicultural practices for Alternative 1, the Forest Service states, with regard to "variable retention harvest" (clearcutting) in Matrix: "This harvest (sic) method would best meet the objective of providing forage and diverse wildlife habitat conditions and provide an adequate benefit to our specific landscape, which is deficit in pre-forest (complex early seral) communities." To the contrary, the Forest Service cannot base this determination solely on federal land holdings in the area. State and private lands to the west, all part of the larger watershed, now possess far more early seral vegetation, in a constantly shifting mosaic, than was the case prior to the twentieth century. Indeed, what is lacking at the landscape level in western Whatcom County is mature forest cover. What the Forest Service is proposing here will only worsen this problem, while demonstrating that the agency has not given a hard look at the cumulative impacts of this project.

Page 24 of the EA does at least acknowledge practices on non-federal forest lands to the west of the project area, though curiously the Forest Service seems unable to make the connection that its proposal will result in more deforestation and fragmentation within the watershed, along with other corresponding impacts upon the natural environment. The agency states that the proposed action "would lead to a greater range of structural characteristics within the watershed," when in fact it would lead to exacerbated reduction in forest cover, accompanied by an ever-greater departure from pre-settlement conditions. On page 25, the Forest Service states

that "complex early seral/pre-forest conditions are deficit across the landscape," which is at best bureaucratically-blinkered thinking and, at worst, dead wrong.

The Hydrology section of the draft EA, beginning page 25, is remarkably sparse, particularly when considering the unstable geomorphology, history of mass wasting events, and elevated potential of the same above Canyon Creek. Enormous public and private resources have been expended to repair and restore aquatic and riparian habitats downstream of federal land holdings, all of which are subject to future destruction via the Forest Service's intent to construct roads and remove forest cover in the upper watershed. The draft EA does not make this connection, and once again treats National Forest land as a bureaucratic island unto itself. Several references to the previously-completed and decidedly timid Nooksack ATM plan and an expected reduction in post-project road density are made in this section, though there are minimal specifics in the draft EA of which individual roads may be subject to decommissioning (aside from allusion to FSR 3040, as mentioned on page 34 of the Botanical Resources section). Is the Forest Service referring in part to unclassified roads initially proposed for reconstruction? These of course were not directly addressed in the Nooksack ATM plan, and their reconstruction/haul use window will be concurrent with their highest risk for failure.

The Soils section of the draft EA (pages 48 to 50), while overly brief, does at least begin to address the risks of unstable slopes, potential for landslides, and debris dam floods along Canyon Creek. However, this section is effectively a passive shrug on the Forest Service's part, more or less communicating that the goal of logging comes first, and maybe you folks downstream will be made to suffer for it, but who knows for sure? The draft EA cites a soil study that is over a half-century old as a reference for project design, though accompanying maps for the project area illustrate logging units and haul road corridors across pre-existing Riparian Reserves (where slope instability is of course greatest) that have curiously been "disappeared" by the rejuvenated timber wing of the Forest Service. It should go without saying that the agency cannot be allowed to endanger downstream communities and fish habitat with this proposal. Pages 50 to 57 (Fisheries section) of the draft EA make repeated mention of opportunities for upgrading the existing road network for haul road purposes, though the Forest Service is not dependent upon damaging logging projects for addressing these trouble spots.

Page 29 of the draft EA nonsensically states: "While there would be a loss of Riparian Reserves, the effects of the project would be site specific and due to separation in space, would have no cumulative effects with the Riparian Reserves in the North Fork Nooksack Vegetation Project." Separation of space in a watershed of course has no protective impact in this context. The very nature of a watershed is that all streams eventually merge. A compromised stream segment three miles from another compromised stream segment soon becomes a larger compromised tributary of the hydrologic system. On a procedural level, as well, where does the Northwest Forest Plan permit "a loss of Riparian Reserves" as part of project implementation? NCCC is aware of no such permissiveness. This directly violates the Aquatic Conservation Strategy's "maintain and restore" requirements.

The draft EA's Climate Change section, beginning page 36, is a slapdash of boilerplate that makes the predictable assertion that the project's impacts would be "negligible" and even "infinitesimal" at a global scale. One would hope that the Forest Service is capable of grasping that a significant proportion of CO2 emissions over all originates through an accumulation of moderately-sized natural resource extractive activities such as the proposed project. Individual residents of the community are increasingly being pressed to switch from natural gas heating systems to electric heating options in their homes, yet the Forest Service has proclaimed that its intent to log nearly 3,000 acres of National Forest, replete with an extensive suite of emission-spewing equipment and logging trucks over a 10 to 15 year period, is somehow exempt from climate change scrutiny. During the scoping period, the Forest Service was explicitly made aware of Buotte, et al.'s "Carbon sequestration and biodiversity co-benefits of preserving forests in the western USA," published 2019 in the peer-reviewed journal Ecological Applications. In that paper, much of the Mount Baker-Snoqualmie National Forest, including the project area, was mapped as acreage that should be preserved (not logged) for its carbon sequestration capacity. The Forest Service has never been bashful about referencing studies from Oregon State University before, so why the omission? Failing to even mention this study in the draft EA after it was brought to the agency's attention is

inexplicable.

NCCC additionally encourages the Forest Service to attend to the rigorous argument for proforestation, as put forth regionally by former state commissioners of public lands Jennifer Belcher and Peter Goldmark through the proposed Washington State Ecological Reserve. Make no mistake, this general model will not be confined to state holdings alone, and reflects the (near-) future of the Mount Baker-Snoqualmie National Forest and eventually most other National Forests -- or else we continue hurtling toward an Earth that is increasingly unlivable. The question is whether the Forest Service is able and willing to adapt to current circumstances in this context or persists in its decades-long slow-walking away from a socially and ecologically bankrupt timber program.

The draft EA's Recreation section, beginning page 40, is inadequate in isolation, as it does not address the broader impacts to the human environment. Specifically, the Forest Service is proposing with this project a radical change in management to a very well known and heavily visited segment of public land. Residents of the rapidly urbanizing I-5 corridor between Seattle and Vancouver, along with the burgeoning population of Whatcom County, are greatly dependent upon an intact upper North Fork Nooksack basin that is free of the wrong-headed industrialization now proposed by the Forest Service. This is not simply a matter of recreation, despite its importance. Regional residents' collective well-being is inextricably linked to the clean and abundant water, sensitive wildlife habitat, carbon sequestration potential, economic benefits, and simple comfort in knowledge of a continually unmolested upper North Fork Nooksack. What the Forest Service is proposing will be directly disruptive to these multiple attributes, which have coalesced over the past 30-odd years. The agency is clearly unaware that the acreage in question is now perceived and valued by the general public (not coincidentally, the ultimate owners of said acreage) in the same manner as a national park. In proposing this massive logging project, Forest Service personnel are working contrary to their employers, and there will be a sociopolitical price to pay for this, whether now or later, but probably sooner than the agency might think. Even now, it is no stretch to argue that the Forest Service is an increasingly irresponsible manager of the Nooksack and Mount Baker area.

In the draft EA's Wildlife section, beginning page 58, the Forest Service suggests that road construction impacts would be largely limited to two miles of new temporary road construction, though this elides the additional ~18 miles of reconstructed unclassified and level 1/closed roads, many of which are currently vegetated along the length of their prisms. Reopening these roads will serve to increase fragmentation of forest habitat for listed species such as the northern spotted owl and marbled murrelet, while boosting the likelihood of corvid predation upon the latter's nests. As such, this "change of habitat" is hardly "negligible" as the draft EA purports, but in fact extensive.

Given this project's proposed industrialization of the upper North Fork Nooksack basin for up to 15 years of commercial logging, its likelihood of sudden and irretrievable alteration to the community's long-running relationship with its public lands, the expected degradation of this forest's carbon sequestration potential, thorough documentation of geomorphological risks above Canyon Creek, and expected impacts to ESA-listed fish and avian species, NCCC requests that the Forest Service drop this backward logging project. Failing that, completion of an Environmental Impact Statement appears unavoidable. Please, belatedly take some time and get to know the larger perspective of the community in the northwest corner of our state, as well as our modern priorities and needs, before making this avoidably big mistake.

Philip Fenner
President, NCCC Board of Directors