Erin Uloth, District Ranger 

MT. Baker River District January 3, 2020

810 State Route 20

Sedro Woolley, WA 98284

Roger A. Nichols

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Subject: Dead-horse Road Relocation, Project Scoping.

Dear Erin:

I have read the proposed action and have the following general observations.

I find the **Purpose and Need** reasonable**.** The North Fork River has been highly active in the channel migration zone since this section of Dead-horse Road FSR 37 was located in its present location in the early 1960’s following the 1962 November storms sequence. The present road location was selected in order to eliminate the Red Bridge crossing, now Red Bridge Campground, and tied the Dead-horse Road in into Glacier Creek Road FSR 39. The present day location follows much of the historic Nooksack River Wagon Road. However the present Dear-horse Road location does encroach in the channel migration zone between Boyd Creek and Red Bridge Campground, and is in constant threat of being washed out in multiple locations along its current location.

**Concerns:**

\*ProposedAction- Concern is in the details of where the final location will be, will the existing fish habitat be damaged and lost, will the interpretative site be relocated, and will the bathrooms be relocated. 75 years after this section of Dead-horse Road was built, the Boyd Creek Crossing and Cascade Crossing are still major issues when relocating the Dead-horse Road. Will these crossings be done correctly this time with bridges? Will the existing fish habitat be trashed?

\*The project proposal appears to move the road away from its current location that runs along a buried forest now being exposed by river scour in the channel migration zone. This is evident by the remnant stumps that are being exposed by the channel down cutting. The map alternatives appear to be located out of the CMZ but it hard to tell. Are the road alternatives relocations marked on the ground?

\*The Dead-horse Road Relocation Project alternative map is difficult to use due to lack of reference landmarks such as major stream crossings.

\*There is no mention of the Hoosier Mining Claim located just west of Boyd Creek and uphill of the Dead-horse Road. The old claim was being explored in the 1980’s -1990. At that time the workings consisted of a locked metal door, and a 75-100’ long tunnel. Whether it’s still being explored is a question. To avoid future conflicts the proposed right of way should be withdrawn from mining activity.

\*Whether bathrooms or interpretive trail will be relocated as part of the project mitigation.

\* If the road relocation will be conducive to future logging operations. Specifically those that encourage forest health and to thin timber stands for multi –layering stand development.

\*Question the need to remove in-stream structures that induce and affect fish habitat. Boyd Creek has been documented to support Chinook and steelhead spawning upstream of the culvert. The rock groins have been documented to support the use of juvenile Chinook utilizing the created upwelling of ground water, and the rock groins and wood structures east of them supported the holding and spawning of Riverine Sockeye when river braids occupied the left bank of the North Fork Nooksack. The groins also protect the upstream portion of Boyd Creek (falls down to Boyd Creek culvert). This area of Boyd Creek has been documented for Chinook and steelhead spawning.

For Reference habitat monitoring has been done on this reach of the North Fork Nooksack spawning and holding habitat.

Nichols, Roger A., and Michael Maudlin. 2007. *North Fork Nooksack In-Channel Project*. In J. E. Doyle, K. Meyers, S. Wegner, P. Fowler (eds.) Developing Monitoring Plans for Structure Placement in the Aquatic Environment. San Dimas Technology & Development Center Monitoring Project (2004-2004), San Dimas Ca. (ch 3 Case Study 8) pp. 89-106.

Thank you for the opportunity to comment on this very important U.S. Forest Service subject.

Sincerely,

Roger A. Nichols

Roger Nichols

Citizens for Forest Roads (CFFR)