

Comment for the Public Record  
Draft Environmental Assessment  
North Fork Nooksack Vegetation Management Plan

04/02/2021

To District Ranger Erin Uloth;

**Comment Summary: The North Fork Nooksack Vegetation Management Plan should exclude all commercial logging activities and focus on long-term monitoring of natural succession, existing road maintenance and stabilization, with any additional alteration of the landscape limited to restoration and stabilization of areas experiencing human-caused damage, such as road beds and previously replanted logging units. Neither option described in this draft EA adequately addresses the cumulative nature of surrounding private timberlands, nor offers an option for minimal human interference to facilitate a more natural and less expensive recovery of the site. A full Environmental Impact statement should be completed.**

The FS's statement of need for the proposed plan is deeply flawed, relies on outdated scientific data, and employs language seemingly designed to mislead any stakeholders not related to the logging industry. I will address the statement by line item:

1.) *"There is a need for more habitat that provides nesting and other habitat characteristics for marbled murrelet and northern spotted owls, in the form of "Late Successional Reserve" forest (LSR; see more in "Land Management Allocations"). Thinning previously harvested areas is a way to facilitate and expedite creation of LSR."*

The most effective and least costly way to achieve late successional forests would be a complete moratorium on logging. Pre-commercial thinning of previously harvested and over planted units may be helpful when accomplished through minimally invasive hand release of very young reproductive plantings. However, by the time trees have developed to commercial size a stand will have recovered some integrity as a forest, including mycological and soil activities which are simultaneously critical to stand health and sensitive to ground disturbance. Modern forest science has clearly debunked the myth that trees are in a battle with one another and need to be rescued from their neighbors. We now know without a doubt that trees, fungi and soil biota work closely together as one living organism, and that the road building and ground disturbance involved in commercial timber harvest greatly outweigh any perceived benefit. It is very disappointing to see the MBRD promulgating archaic theories in an effort to sell commercial logging to the general public!

2.) Regarding previously-logged riparian reserves: *"There is a need for a restoration of this landscape to a condition*

*that would be resilient to major disturbances such as drought insects outbreaks and fires, and to provide and protect habitat for native species and species of concern."*

Once again, with the exception of some hand release pre-commercial thinning, the ground impact of "restoration" activities would cause more trouble than currently presented by existing conditions. Even in a the monocultural setting of previously logged areas, commercial grade trees offer the shade and bank stabilization so critical to riparian areas. Riparian rehabilitation should focus on in-stream structures to replace the big logs and root-wads that have become scarce due to loss of old growth through logging, and on water retention strategies such as bringing beaver back to the lower reaches of local streams and leaving existing trees in place to provide for shade pools.

3.) *"There is a need to maintain access to the national forest for a range of reasons, including active management, public recreational use, Tribal treaty right activities, administrative purposes and others."*

The discussion around this topic should be limited to which existing roads are necessary to fulfill the above needs and how to adequately maintain those roads. Based on the MBRD's own record of unstable slopes and mass wasting throughout the proposed area, there should be no consideration of either building new roads or opening those already put to bed.

4.) *"Lastly, there is a need to contribute to the local economy in a way that sustains both local industry and forest resources."*

For going on three decades, the "local economy" has consisted mainly of tourism and recreation. The primary "forest resources" of the proposed area are scenery, habitat, carbon sequestration and recreation. Do we need lumber? Certainly. But we should not be mining the remnants of mature forests in the headwaters of prime salmon habitat to get it. The aggregate cost of mandatory compliance measures, administering timber sales, opening or building roads that can support heavy equipment and rehabilitating streams after road failures renders timber harvesting in terrain such as Canyon and Glacier Creek drainages unprofitable to the public in the long run.

### **Requests:**

1.) Conduct a full Environmental Impact Statement for the proposed project.

2.) Do not consider any further commercial thinning or timber harvest in the proposal area.

3.) Base all planning on current conditions on the ground. This would include considering the cumulative impacts of adjacent commercial timberlands, collecting

updated monitoring data, and using the most recently available principles of forest science.

Thank you for the opportunity to comment.

Heather Swanson