

NORTH CASCADES CONSERVATION COUNCIL
PO BOX 95980
SEATTLE, WA 98145

www.northcascades.org



May 31, 2022

Jody Weil, Supervisor
Mount Baker-Snoqualmie National Forest
2930 Wetmore Avenue, Suite 3A
Everett, WA 98201

Dear Supervisor Weil:

The North Cascades Conservation Council (NCCC) was founded in 1957, and our mission is to protect and preserve the North Cascades' lands, waters, plants, and wildlife through public participation and legal channels. NCCC wishes to object to certain components of the revised decision notice and finding of no significant impact (DN/FONSI) for the **North Fork Nooksack Vegetation Management Project**, as informed by its revised environmental assessment (EA). This project is located in the Mount Baker Ranger District of the Mount Baker-Snoqualmie National Forest; and you, Supervisor Weil, are the Responsible Official. Our specific objections follow:

ECONOMIC IMPACTS

The EA does not include even a cursory economic analysis of 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 implementation of this project, relative to impacts to the county's forest products sector. For example, in its "Economic Analysis of Outdoor Recreation in Washington State," a 2020 updated study funded by the State of Washington, Earth Economics quantified that 264,000 jobs statewide are supported by spending on outdoor rec alone, which dwarfs the gradually declining timber industry figure of 42,000.

As stated in our previous comments to the draft EA: *(The draft EA) ignor(es) 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 (sic) ratio in jobs per the State of Washington.*

To reiterate our previous request, an impartial, objective economic analysis in this context is needed prior to implementation of this project. This analysis should also include the full lifetime costs and revenue of this project, encompassing cost recovery via anticipated timber sale receipts relative to the overall project costs to the U.S. Treasury, as well as the Forest Service's expected reliance upon future Congressional appropriations.

LSR TREE REMOVAL OF GREATER THAN 20" DBH

The Regional Ecosystem Office's approval of extracting trees up to 26" DBH in LSR is plainly arbitrary and relies exclusively upon the interdisciplinary's team proposal, meaning that no objective review was conducted, which itself means no real oversight occurred. The REO does

concede that this determination is inconsistent with memoranda 694 and 801, yet while offering no defensible rationale for this change aside from stating that "...harvest of these trees is being proposed to benefit the creation of late-successional forest conditions which serve as habitat for late-successional and old-growth related species." The ID team's dogmatic reliance upon a "treatment objective of 35% of SDI max" ignores stand density heterogeneity across natural landscapes of comparable forest type in the Nooksack basin and nearby sister basins. The proposal as a whole smacks of intensive engineering, with the apparent goal of creating a frankenforest, with seemingly no insight toward the absurdity of attempting to accelerate a process (old growth features) which by definition requires the passage of ample time following a stand replacement event. The ID team's proposal additionally attempts to wave away in one sentence the obvious option of dropping and leaving larger trees for purpose of biomass accumulation, which would inarguably improve the conditions of these LSR stands far beyond extracting these trees for lumber. Habitat is the priority here, is it not?

As stated in our previous comments to the draft EA: *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.*

We request that the 20" DBH limit for tree extraction in LSR stands younger than 80 years be retained for this project. Or, failing that, for any trees beyond this size limit which foresters insist be cut to reduce stand density, drop and leave each of them without exception.

ROAD CONSTRUCTION

Final NEPA maps and narrative for this project fail to convey where new haul road construction (whether "temporary" roads on virgin terrain or reconstruction of existing grades) would occur; including what proportion of these road prisms would be constructed in LSR acreage versus Matrix acreage, as well as those which would overlap Riparian Reserves. The documentation additionally fails to identify if any of the proposed reconstructed road prisms would occur along corridors which have become hydrologically mature in the decades since they were first constructed. Maps associated with the draft EA do offer some general orientation in this regard, though are of far too coarse scale for adequate scrutiny.

Further, table 2 of the revised DN/FONSI reflects a considerable increase in open road density post-project, by converting several level 1 (closed) roads to level 2 (high-clearance) roads, along with no near-term decommissioning of system roads. However, table 5 of the DN/FONSI then incongruously portrays no long-term increase in open road density across the affected subwatersheds. In combination with extensive, planned "temporary" road construction, these level 1 to level 2 conversions indicate that open road density in the project area, overlapping a tier 1 Key Watershed, will increase substantially. Yet S&G, p. C-7 of the Northwest Forest Plan disallows a net increase in road density in key watersheds. Increased open road density must be offset by decommissioning at least an equal amount of existing roads.

As stated in our previous comments to the draft EA: *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.).

We request publication of adequately detailed maps of all proposed road (re)construction for this project with appropriate layers for identification of whether they would occur on LSR, Matrix, and/or Riparian Reserve terrain. We additionally request the elimination of all varieties of any new road construction within LSR and Riparian Reserves. Finally, please resolve the apparent contradiction of tables 2 and 5 of the revised DN/FONSI, while also identifying opportunities for decommissioning of specific system roads in order to offset the increased open road density that will otherwise occur within a tier 1 Key Watershed.

CLEARCUTTING IN MATRIX

NEPA documents for this project continue to fail to analyze the cumulative effects of proposed deforestation (“variable retention harvest”) in Matrix in light of ongoing clearcutting activities on private and state lands immediately west of the project area and throughout much of western Whatcom County. Documentation does not take into account that “early seral habitat” acreage here is currently far above the pre-European settlement baseline. Additionally, ungulate populations (the intended beneficiary, along with hunters, of such clearcutting) in Whatcom County are by no means depressed in the slightest. There is in fact an overabundance of deer, which in and of itself is well established to negatively affect the local ecology.

As stated in our previous comments to the draft EA: (T)he 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.

We request that new openings in the Matrix portion of this project be limited to smaller, traditional “gaps” as commonly implemented in variable density thinning projects across Region 6 over the past two decades.

CARBON SEQUESTRATION

NEPA documentation for this project fails to analyze the area’s carbon sequestration potential if left unlogged, in comparison to anticipated loss of the same as a result of project implementation; in combination with immediate CO₂ emissions via operation of logging, road construction, and yarding/hauling equipment. This is a matter of enormous importance, considering that climate change-influenced weather events are now directly killing citizens in our region and inflicting significant economic damage (e.g., the late June 2021 “heat dome”). Remarkably, the revised DN/FONSI for this project casually and erroneously states that “no significant effects to public health or safety are anticipated.”

Harris *et al*’s “Attribution of net carbon change by disturbance type across forest lands of the conterminous United States” in *Carbon Balance and Management* (2016) concluded that logging in the United States releases five times the CO₂ as wildfire, bark beetles, windthrow, land use conservation, and drought combined. Oregon State University’s Beverly Law’s research, published by the National Academy of Sciences in 2018, showed that 35% of the carbon emissions in Oregon result from the wood products sector. Moreover, OSU’s Polly Buotte and colleagues in *Ecological Applications* (2019) found that wetter western forests, including the MBSNF, have the potential to sequester up to six years of current fossil fuel emissions in the region if left unlogged.

As stated in our previous comments to the draft EA: (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.

We request an amendment to the final EA that finally acknowledges the aforementioned peer-reviewed research and analyzes the potential for this project to directly impair the area's capacity for carbon sequestration. A point of comparison (for clarification of scale) in this regard might reasonably be local municipalities, which are in the process of committing large expenditures (with increased taxation of individual residents) for meaningfully reduced CO2 emissions, across comparable acreage to that subject to industrialization by the Forest Service via this project. This would at least convey the agency's desire to be a good neighbor.

Philip Fenner
NCCC President

Jim Scarborough
NCCC Director & Lead Objector