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Comments: The North Fork Nooksack Vegetation Management Project is a radical departure from over a quarter-century of USFS management direction and actual on-the-ground activities within the MBSNF. Given the watershed-scale scope of this project, the immense volume of natural resource extraction involved, the likelihood of significant controversy over this project among local and regional communities, and significant effects upon the quality of the human environment (particularly as they relate to climate change), completion of an environmental impact statement (EIS) is necessary.

The scoping notice for this project makes no mention at all of climate change, despite the increasingly severe and evident risks to our local/regional ecosystems and adjacent human communities. The EIS must take into account research such as Buotte, et al.'s "Carbon sequestration and biodiversity co-benefits of preserving forests in the western USA" through Oregon State University, published in Ecological Applications in 2019. The authors conclude that preserving temperate forests in the western U.S. (including the MBSNF) that have medium to high potential carbon sequestration and low future climate vulnerability could account for a third of the global mitigation potential identified for temperate and boreal forests.

The proposed project, however, flies in the face of this evidence, opting instead for extensive tree/biomass removal and deforestation through "stand replacement" actions. These misguided operations would of course be exacerbated by extensive carbon emissions associated with logging, yarding, and hauling timber from selected units. The Forest Service cannot subject local and regional communities to the increased risks of climate change for discretionary (plus foreseeably low demand) timber extraction without first completing an EIS.

Beyond this overarching concern which applies to essentially all aspects of this project, a number of other specific concerns must be fully addressed through the EIS. These follow:

Stand replacement (i.e., clearcutting) operations on Matrix land have no justification as they relate to creation of early seral habitat. Private and state timberlands immediately west of the project area already have a tremendous overabundance of early seral habitat due to clearcut logging, with more being "created" with each passing year. What's rare, instead, are functionally mature forests, which the MBSNF can and should provide across its holdings, aside from the alpine zone and specific areas subject to natural disturbance. Whatcom County's early seral acreage is many times more abundant now than the pre-European settlement baseline.

Huckleberry enhancement activities should be limited to Matrix zoning and, preferably, limited to a demonstration project of modest acreage. This is not an appropriate action for LSR zoning, which is primarily set aside to provide core habitats for northern spotted owl and marbled murrelet. An attempt to farm huckleberries in LSR is the complete antithesis of the intended management direction for this zoning under the Northwest Forest Plan.

Similarly, the Forest Service's desire to connect roads 3120-035 and 3132 in order to avoid the Jim Creek slide is not justifiable for LSR land. Along with new road construction being generally not recommended in LSR in the standards and guidelines of the Northwest Forest Plan, any management activity here must be "beneficial" to late-successional forests. Connecting these two roads along virgin ground would merely fragment the forest, while inviting corvid predation of murrelets and invasive weeds.

It follows that new road construction, including "temporary" road construction (where the bulk of hydrologic and soil damage occurs well before a temp road is removed), should be avoided entirely for this project. The second paragraph of page 2 of the scoping notice specifically prioritizes the need to prevent fires and protect native species, but new road construction would achieve precisely the opposite. Roads are vectors for weeds and

generalist predation, which crowd out or kill native species. Moreover, they encourage wildfire by way of opening new travel corridors for human visitation. The Forest Service itself estimates that approximately 80% of all forest fires are human-caused. On the Mt. Baker Ranger District, of course, visitation is very high year-round, and it is likely that any new travel corridor will be "adopted" by subsets of visitors (some with perhaps ill intent) and never allowed to revegetate.

As such, stands subject to commercial and pre-commercial thinning for this project should be limited to those which can be accessed by existing system roads. These same stands should also be objectively assessed as plantations and not naturally regenerated second growth. The latter should not be silviculturally treated, but allowed instead to continue along its natural trajectory. Additionally, commercial thinning, where it occurs, must avoid the linearity and homogeneity so omnipresent across previous thinning operations in western Washington, and take precautions to avoid a resurgence of hemlock seedling carpets (a phenomenon often observed in wet, thinned forests in the Pacific Northwest). Commercial thinning, having no natural analogue, is always a harmful activity in national forests, and should be modest in scope until such time that logging is ended entirely on the MBSNF.

There is no mitigation mentioned in the scoping notice, but the Forest Service should consider aggressive removal of unneeded spur roads in the N. Fork Nooksack watershed as part of this project. The great failure of the Nooksack ATM plan was its unwillingness to address the excessive road system here. One guiding formula might simply involve decommissioning one superfluous road spur for every thinning unit approved.

Proposed trailhead expansions involved with this project should not proceed if they involve clearing of peripheral native forest within LSR. Doing so would contravene the standards and guidelines of the Northwest Forest Plan for this particular zoning. Instead, a smarter redesign of trailhead parking within existing footprints, including perhaps parallel parking along access road shoulders, should be explored. If such a redesign is insufficient to accommodate demand, then trailhead shuttles should be explored as an alternative. Any increase in the area of trailhead parking will lead only to increased visitation, quick obsolescence of the expansion, and near-future demand for additional clearing/hardening.

At this juncture, replacement of the Thompson Creek bridge appears to be the sole activity associated with this project that would not result in direct degradation of the North Fork Nooksack watershed.