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Organization:

Title:

Comments: "North Fork Nooksack Vegetation Management Project"

Regarding North Fork Nooksack Vegetation Management Project Scoping:

Economy: Counties receive 25% of revenue in lieu of taxes and a web of rural economic activities benefits from timber harvesting. Alternatives need to cover maximizing volume removed and acres treated. Regeneration harvest that requires replanting needs to be part of alternatives and the increased economic benefit analyzed. Alternatives need to maximize retained receipts for KV projects that provide for public benefits and engage local contractors.

Maintain Access: Minimal road maintenance since the adoption of the NW Forest Plan has created a road system that impedes more than facilitates public access and use. It also seriously impacts the ability to service needed recreational facilities. Increased administrative costs due to poor road conditions only worsens the ability of the Forest Service to actually serve the public and care for the land. Lack of maintenance has created road conditions where resource damage is likely to occur. Another consequence of poor road condition is its impact on social justice. Under-served groups may not be able to afford an expensive high clearance vehicle needed to visit some areas of their National Forests. Years of resource protection and ideologically driven road closures and decommissioning does not leave much if anything for "right sizing" the road system. The analysis needs to take a hard look at ways of maintaining access rather than cop out and destroy more public road assets. More areas treated by timber harvest will increase the amount of road maintenance accomplished. An alternative of the EA analysis should consider maximizing acreage and areas harvested, volume removed and value of timber. Timber appraisal needs to follow widely accepted appraisal practices so that it can inform the public.

Recommended Scenic River: Where dense, and/or unhealthy stands of trees exist created by prior harvesting, thinning for forest health reasons should be done. Visual guidelines need to be laid out in the EA and followed to ensure stands have a natural appearance after harvesting. A professionally managed stand of trees will create a more visually appealing scene than a crowded forest with significant dead trees. The analysis needs to cover treatments in this area. Recommended status should not be an excuse for no action.

"Ensure consideration of the economic aspects of various systems of renewable resource management" (NFMA): The EA's harvest analysis must incorporate modern logging equipment capabilities into alternatives. Tilt cab or self-leveling equipment is easily and safely able to log on 55% slopes: tethered equipment even steeper. Analysis of forest treatments using modern harvest capabilities will increase the ability to economically treat more acres of forest and do it in a safer manner. The alternatives need to explain how putting people at risk in unnecessary cable harvest units serves the public interest. The alternatives need to cover acres in need of treatment and not be limited by an arbitrary and capricious choice of slope. This would accomplish multiple stated goals, adhere to the laws that guide Forest Service activities and be congruent with the Forest Service Forest Products Modernization strategy.

Sincerely,

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