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Organization:

Title:

Comments: 5 April 2021

District Ranger Gretchen V. Smith

Mount Baker Ranger District

810 Highway 20

Sedro Woolley, WA 98284

Re: Comments on USFS Draft Environmental Assessment Document Package for the Proposed North Fork Nooksack Vegetation Management Plan

Dear Ranger Smith,

I will say at the outset that I wholeheartedly support practical, carefully planned, proactive forest management including timber harvest on federal lands for the host of beneficial outcomes and reasons that exist.

I think this specific effort is well past due in the North Fork Nooksack basin as well as elsewhere on the Mount Baker Ranger District and for that matter the entire Forest and I'm actively advocating for it.

To stretch a metaphor, my view is that the Forest Service proposal should be seen/accepted as a triage of patients for essential surgery and not a mere consultation for cosmetic alteration.

I hasten to add, specifically, that I inquired at the outset (scoping) why second growth units elsewhere in the delineated project area (i. e. Skyline Divide and Cougar Divide) were not included for treatment in this cycle, not to mention others in the Upper North Fork basin (Anderson and Razorhorne creeks) that were left out entirely.

My overriding sense from going in just 30 days through the compilation of main and supporting document for a project of this scale is that district and North Zone staff in the past year were even more so severely pressed by an impractical timetable and crowded schedules in their preparation.

I apologize for the somewhat disjointed and perhaps trivialism oriented nature of my response. It represents my impressions, in part, due to frustration with the documents themselves together with the temporal constraints impressing on me as a citizen to find the time to first 'get educated' before I constructively criticize. But to reiterate, I want this project to succeed and lead to more such valuable work.

Here are some of my impressions and conclusions:

Fish-presence-in-streams mileage estimates table _ the figures cited do not correlate closely with WDFW delineated current, historic or potential distributions of fish in the project area. WDFW has the greatest repository of info types on known (verified) usage or occupancy. Pulling back to a higher vantage point to speculate it appears that the state agency with this knowledge wasn't consulted much if at all.

How the animals use the land _ To add to a compelling case for doing the work to improve habitat characteristics, quality or availability, at the very least thumb-nail sketches of species life histories (niche occupancy, life-stages) should be included in the EA. The generalized references to their being in a place or simple line graphs for temporal depiction are not compelling examples for justifications. I think that is most certainly the case in the EA insofar as fish are concerned, but their absence is noticeable for wildlife components as well.

Land Usage Map: a detail_ Wild and scenic rivers depictions (slanted lines) of recommended management reaches are confusing to me in that it appears 'Recreation' is focused on the short Nooksack Falls reach alone, while 'Scenic' is focused on much longer reaches above the falls and downstream toward Glacier where on-water, fishing, and other recreational activities are actually taking place.

Bibliographies _ I don't find convenient full literature references and accept that this may just be a result of document style strictures. However, either comprehensive (appended to the final main document) or shorter 'cite' lists included at each sub-head end level are essential to demonstrate underpinnings of the document.

Intra-annual snow pack retention _ as a targeted outcome of proposed silviculture treatment, this justification

does not appear to have been given a level of consideration that it deserves. I refer to a recent research and literature from the University of Washington pointing to the importance.

Lower forest density enhances snow retention in regions with warmer winters: A global framework developed from plot-scale observations and modeling. Jessica D. Lundquist, Susan E. Dickerson-Lange, James A. Lutz and Nicoleta C. Cristea

Excerpt from reference conclusions _ future management recommendations:

"Even where no desire exists to directly manipulate the forest, these results provide key insight into how water managers must consider joint climate-vegetation change. For example, past and present management practices of fire suppression, timber harvesting, and silvi-culturally motivated replanting have led to very dense forests in many regions [Rautiainen et al., 2011]. However, recent observations and projected trends indicate increasing forest stressors (e.g., drought, insect infestations, and fire) and rapid forest die-backs [e.g., Kurz et al., 2008; Allen, 2009]."

"Depending on climatic and topographic location, these changes could have quite contrasting impacts on snow and hydrology. [54] Some management actions, such as strategically introducing canopy gaps to fire-suppressed forests, could not only optimize snow retention, but also increase fire resilience and landscape heterogeneity [Larson and Churchill, 2012]. The framework presented here provides a starting template for expected forest-snow-climate interactions that can guide regional experiments to determine the best paths forward for joint forest-water management. [55]"

Mountain goat habitats _ the ones depicted on maps are referenced as 'winter' and appear to have been, in most cases, delineated from modelling not actual on the ground observations from various sources. The West Church Mountain band is in occupancy on its habitat 12 months of the year adjusting to season temperature regimes by moving to the ridge crest and onto forested north slope faces in summer, while during the winter moving up and down on south faces in escape terrain habitat with the freezing level. Old growth logging decades ago truncated their use of this range, but they persisted.

Elk forage enhancement _ because of other constraints/needs, treatments are being done in a general locale in the project area that elk have not occupied in the modern era. At the same time, sub-areas in the Deadhorse Creek/Skyline Divide and Cougar Divide locales where small bands are currently domiciled are not proposed for treatment at all. Further, a small seasonally migratory band that occupies the Upper North Fork east of Glacier will not benefit, because their summer habitat locales were omitted preemptively.

Hedrick versus Hendrick... a creek detail _ use of the formal watershed name (in first and subsequent references) _ though strictly speaking correct _ was/is misleading. The Forest Service's project focus is actually on the north side of the river opposite and away from the watershed namesake's physical location. Adding to the confusion, in the EA, there are references to 'Hedrick Creek' sub-basin, while in at least one table the name "Hendrick" appears. It took me 20 minutes of Internet and downloading activity just to reconcile this one tiny, confusing element and disparity.

To close, I hope that an executive summary can be produced with the final draft, which is faithful to the complexity, detailed and highly professional lexicon of that working (legal) document, that communicates to the public at large the basic concepts what's planned and what will happen.

In my experience of 70 years here, there's significant backing in the Whatcom community, among those who love the National Forest, for such proactive and worthwhile ventures. I'm certain that most everyone in the public can find something in the proposed project with which they can agree and embrace that will engender their affirmative support.

Again, I apologize for the disjointed approach of this response.

To conclude on a positive note, thank you for your service to our country and its natural resources.

Douglas R. Huddle