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First name: roger
Last name: nichols
Organization:
Title:
Comments: Objection Reviewing Officer June 8, 2022, 2022

Region 6 Regional Forester

Pacific Northwest Region

USDA Forest Service

Atten: 1570 / 1950 Objections

PO Box 3623

Portland, OR 97208-3623

Re: North Fork Nooksack Vegetation Management Project # 58218 Objection.

Objection Reviewing Officer

I am providing an objection letter regarding April 25, 2022, North Fork Nooksack Vegetation EA, and Draft Decision Notice and Finding of No Significant Impact. I object to the proposed Draft Decision. The following are my issues with the draft decision:

Issues:

Objection: Not thinning all previously harvest units along road corridors in North Fork Nooksack Project Area

Draft Decision does not include all open roads for thinning to provide safe and healthy road corridor. The 1990 Mt Baker -Snoqualmie Forest Plan recognized roads as wildlife 300' corridors (150' either side of the road) as a disturbance zone. By not thinning these areas to grow healthy vegetation, the vehicle traffic is subject to the hazard of tree fall. Case in point: last year a tree smashed the front of a recreational vehicle being driven down the Glacier Creek Road FSR 39. Vehicle was un-drivable.

This example is one of many in the North Fork Nooksack River Basin were the Forest is liable by not making the effort when it has means to thin older harvested units along road corridor. Visitors to the Mt Baker National Forest drive these un-thinned travel corridors and are at risk of injury. In the last several years the Forest response to hazard tree reports is to ignore them and criticize reporting person as being unqualified. Some of us have over 50 years of working in the woods and hang out with silviculturist pathologists.

The Forest is also delinquent in removing road side hazard trees (snags specifically) once they have been reported. There is a significant accumulation of roadside snags along some of the roads that are not included in this thinning exercise owing to the lack of response for the last 10 years. Responsibility of removal of snags and hazard trees along a road corridor is spelled out in the FS Engineering manuals. 1

In case of Dead-horse FSR 37 un-thinned travel corridors also do not help contain wildfires. The area directly south of the Dead-horse Road FSR 37 travel corridor was observed in 2021 to have 20% mortality (dead and dying) upslope in the SLR. The 1995 North Fork Watershed Analysis documented and illustrates the fire history of the drainage area including specifically this area as well as Church Mt area. Thinning for spacing and multilayered canopy should be practiced in these areas to reduce the trend of high density (stems per acre) and resultant high mortality resulting from high competition for nutrients and water. This part of the Cascades fires typically also remove ground humus which has an important water retention factor in these summer drought Forest.

Objection: Thinning design

Cumulative Effects Analysis (CE) omitted key effects of base thinning design layout and riparian setback requirements, which are required.

CE analysis is a requirement of the 1990 Mt Baker-Snoqualmie Forest Plan and 1994 Pacific Northwest Forest Plan that "Key Fifth Fields" watersheds (impacted watersheds) undergo CE analysis. Since 1990 MBS has conducted CE analysis using Canopy Recovery Evaluations. This was the standard through 2009 for determining layout for thinning sales to minimize rain on snow effect. Both riparian setbacks (no-cut zones) and thinning spacing between dominate trees, based on site productivity for canopy recovery to minimize effects of rain on snow. A more recent example can be found in Darrington WA, Dan's Creek Thin, off FSR 24. The local thinning example off the Canyon Creek Road 31 harvested in 1990's Loretta Thin Timber Sale locate off FSR 31 and 3120, Canyon Creek Road 31, Glacier WA, North Fork Nooksack. Also, current thinning design to create opening is in violation of US District Judge Mendoza Jr's decision to dismiss the need to target Grizzly Bear Recovery.

Using Franklin as a citation has little merit since he was a proponent of letting stands develop over time due to natural events. He did not address cumulative effects of runoff and stream discharge that resulted from canopy removal. In the project area, Canyon Cr fifth field and lower North fork Nooksack fifth Field, Key Watersheds are both located in areas subject to Rain on Snow Areas thus the CE requirement. Canopy CE analysis was

developed and applied by the Forest successfully to reduce stream flushing due to rain on snow events. In fact, in his presentation to Congress, Forest Supervisor of the Mt Baker-Snoqualmie National Forest (MBS), Doug McWilliams' 1990, informed Congress that the MBS would not be able to make assigned harvest targets (essential to generate revenue). (Notably, this was the first time a Forrest Supervisor reported inability to execute a timber harvest directive.) Now thirty years later the current timber proposal is not using tools developed to determine harvest and thinning densities.

Objection: Arbitrary use of 20" diameter tree limit.

Arbitrarily limiting tree removal to trees larger than 20" diameter (DBH) (except for Marble Marlet's nesting trees along waterways for potential nesting branch platforms) is poor silviculture practice. 2

Past history has used tools to harvest second growth units. These tools are significant in decisions about spacing between 'leave trees' and tree removal decisions should be made on-site, and should include current conditions and future site productivity, leaving larger healthy trees, properly spaced to allow understory vegetation to develop. The objective should be creating a healthy multi-level vegetation stand which is more resistant to wind throw and disease.

Objection: Projects

Thompson Creek Bridge is currently a double-lane bridge with sidewalk for visitor viewing. This bridge should be structurally refitted or replaced due to its creosol piling and bulkhead which is toxic to Juvenile fish. The bridge was installed following the Thanksgiving Day 1962 storms which washed out a culvert. The crossing has handled the storms of record since then for the North Fork Nooksack.

The proposal is to replace the existing bridge with a single-lane bridge with a sidewalk. The current sidewalk is popular for public viewing of returning pink salmon runs for educational purposes. A single-lane bridge with sidewalk is questionable due to the road and stream geometry below and immediately above the bridge. Thompson Creek is an important rearing area for Nooksack pink salmon. Nooksack pink salmon are considered the smallest and weakest swimmers of the Puget Sound pink salmon runs. Maintaining flow depth for these pink salmon to navigate this stream section is critical. In 1990 due to upstream channel sediment plum the pinks were not able to negotiate past this point. So just replacing this bridge with a longer span isn't going to provide the water depth needed during spawning migration.

Object to the bridge being financed under this timber sale. Region 6 Fish Program 2019 EA made replacing creosol foundation bridges a regional priority and has available fisheries dollars or funding sources for this purpose. Using timber sale money for a major bridge is poor decision making when a culvert a on the same road providing public access deficiencies will be ignored due to funding allowing for continued road degradation and direct sediment delivery into the sensitive water body of Glacier Creek.

Object to the current alternative for Boyd Creek Fish culvert replacement.

The Mt Baker -Snoqualmie National Forest 1990 Forest Plan states desired conditions standards and guidelines which must be followed unless Forest Plan is amended. Chapter 4: Desired Future Condition 4-10 Population of bald eagle on winter feeding ground will remain same or show slight increase nesting and perch areas managed sites. Will develop opportunities for public to view wildlife. Programs help the public to view wildlife to increase understanding and appreciation of wildlife. 2022 observations were made of two adults and one juvenile perched and river bar feeding on salmon carcass. This observation

was reported to WDFW. Nowhere is this item considered in the North Fork Nooksack Vegetation Plan. There was no mention of this in the Timber Sale EA.

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Object to using timber receipts for Boyd Creek Culvert replacement, a major fisheries project which reroutes a high recreation use, level 3 road .

This project poses a potential impact to the North Fork Nooksack Nominated Wild and Scenic River's national classification. This project, Boyd Creek Road Relocation is ill-conceived as it creates a whole new road with associated site disturbances instead of repairing an existing established road. In any case, it is questionable to finance the culvert replacement and new road if there are no timber receipts being generated in this area. This project should be financed through the regional fisheries dollars. A major flaw to this project is the selected Decision Alternative witch also falls short of providing a long term solution. Currently the river is threatening to remove the Forest Service Road at MP 3.6 and that is upstream and the selected alternative ends the realignment at MP 3.4. The selected alternative also requires 6 streams crossing to be constructed while replacing one outdated culvert.

Object to unrealistic restrictions on roadside plant management for road maintenance.

Confining roadside brushing to winter months is totally impractical and unrealistic.

A more reasonable approach would be brushing after growing/flowering season.

Object to the practice of not replacing deficient culverts, before repaving or resurfacing roads. Mt Baker -

Snoqualmie National Forest 1990 Forest Plan.

Road Facilities P 4-138, No. 2.

Construction Roads will be designed, constructed and /or reconstructed according to standards appropriate to planned uses, activities, safety, economics, and impacts on lands and resources using criteria in FSM 7700 and 7720 or as revised.

Land Use Forest Wide S&G p 4-138

The practice of resurfacing and paving over deficient culverts has been the history for Canyon Creek FSR 31 and Glacier Creek FSR 39 both following ERFO repairs, capital investment, and now likely this Timber removal proposal. This is poor priority selection to provide safe public road access, without providing safe road foundations.

Sincerely,

Roger Nichols