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June 8, 2022

Objection Reviewing Officer

Region 6 Regional Forester

Pacific Northwest Region

USDA Forest Service

Atten: 1570 / 1950 Objections

PO Box 3623

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

Objection Reviewing Officer

This letter raises my objections of both a general nature and on substantive points regarding the April 25, 2022, North Fork Nooksack Vegetation EA, and Draft Decision Notice and Finding of No Significant Impact.

For the record, I agree with and support in principle the Forest Service's assertion of the necessity for this project as well as the description of the desired and likely outcomes of the silviculture treatments to be applied.

The following are my issues with the draft decision:

Objection 1: I think the project as described does not go far enough in remediating and repairing current substantive deficiencies in road condition as well as upgrading to current agency standards existing roads that are to be kept on the landscape open for public use or in storage for future administration or management activities. The project fails to adequately address replacement of culverts that are undersized, passed the end of their service lives or that are structurally damaged due to fill slumping/shifting.

Objection 2: the draft environmental assessment does not present data on fish species presence in sufficient detail to provide appropriate guidance to both road and timber harvest managers in laying out treatment units and making effective AOP prescriptions for road drainage.

Objection 3: a key justification for this project is to improve habitat quality for ungulate species, specifically elk. however, the project area does not include locales or sub-drainages in the North Fork Basin on the district where remnants of the Nooksack (a formal WDFW and treaty tribe animal management group) elk herd persist (specifically, the Deadhorse Creek, Wells Creek, Anderson Creek and Bagley-Razorhone Creek watersheds). This project should be scoped to include treatment of second growth stands in upland locales Cougar Divide, Goat Mountain, Skyline Divide, Barometer Mountain and Mount Herman together with locales currently included in the environmental assessment.

Objection 4: Intra-annual snow pack retention as a targeted outcome of the proposed silviculture treatment, is not adequately considered in the EA. Recent research conducted by the University of Washington points to the imperative of modifying second growth timber stands to foster better water retention and improve annual hydrologic regimes in montane basins:

This is covered in a research document:

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]"

Objection 5: The project puts too much emphasis on establishing by thinning/clearing prescriptions openings for encouraging berry plant expansions. Instead it should emphasis or mandate thinning to a range of conifer stem densities (depending on slope elevation, aspect, soils and other appropriate ecological attributes that fosters uniform distribution of conifers in keeping with late successional stage targets. Opening stands at mid and lower elevation for berry colonization is a landscape attribute target cited as needed for proactive reintroduction of grizzly bears, which is no longer a planned project or targeted outcome on the Mount Baker Ranger District. There should not be any arbitrary DBH minimum or maximum harvest size for treated second growth units.

Objection 6: While the old creosote timbered structure must be removed, the specifications for replacement of the Thompson Creek Bridge are not detailed enough to be able to conclude that a replacement structure will not result in fluvial dynamics across that deltaic (sediment accretion zone) changing in such a manner that bedload accumulation inhibits or denies altogether access by salmon, steelhead and native char.

Objection 7: With the volume of remedial, repair and upgrade work that needs to be done on forest roads within the project area there should be a stipulation in the decision that anticipated timber receipts will be used first and foremost to address all the drainage, structural and longer term road maintenance needs before funds are used on roads nearby but outside the currently defined bounds of the North Fork Nooksack Vegetative Management Project.

Thank you for allowing me to bring my concerns about this management assessment and decision to your attention.