



American Rivers
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July 1, 2020

Erin Uloth, District Ranger
Mount Baker Ranger District
Mount Baker-Snoqualmie National Forest
810 Highway 20
Sedro-Woolley, WA 98284
comments-pacificnorthwest-mtbaker-snoqualmie-mtbaker@usda.gov.

Re: North Fork Nooksack Vegetation Management Project

Dear Ms. Uloth:

The Wilderness Society, Washington Wild, American Whitewater, and American Rivers thank you for this opportunity to provide comments on your scoping notice for the North Fork Nooksack Vegetation Management Project. We are interested in being directly involved in the development of this project, and we appreciate having the opportunity to hear from you personally and ask questions about the project during the Zoom meeting with stakeholders on June 22.

At this point in the project development process, we are mostly interested in learning more about the Forest Service's proposed vegetation management activities and their potential effects on the forest ecosystems and aquatic resources of the North Fork Nooksack landscape. We also want to ensure that the project design is consistent with the Northwest Forest Plan, which we support, and is informed by the best available science, including the best ways to help mitigate and adapt to the effects of climate change.

Some of the questions and issues posed below were asked and discussed during our June 22 call, but we want to reiterate them here for the record.

- What types of stand regeneration harvests do you anticipate using, how large will individual harvest units be, and how closely or widely spaced will these units be? We realize that the Northwest Forest Plan allows for regeneration harvesting on Matrix lands, such as the 1,861 acres identified for potential regeneration harvest or commercial thinning in the project area. Please pay careful attention to Matrix management guidance in the Northwest Forest Plan, including specific direction that for Matrix in the Mount Baker-Snoqualmie National Forest "site-specific prescriptions should be developed to maintain biological diversity and ecosystem function...." (NWFP, p. C-41)
- Will stewardship contracting and/or Good Neighbor authorities be utilized in the implementation of the project? How will any retained receipts be invested locally? Neither stewardship contracting nor GNA existed when the Northwest Forest Plan was adopted, but we

consider them to be important management tools that the Forest Service should consider using in this and other forest management projects.

- Have you consulted with interested tribes, and how does the project design reflect their views and priorities? We strongly support tribal engagement in this and other Forest Service projects. We know that at least one tribe, the Lummi Nation, has provided formal comments highlighting a number of important factors to consider.
- What are the potential impacts of the project on salmon habitat and watershed conditions under the Watershed Condition Framework? The project EA should explain how the affected watersheds are classified under the WCF, including an evaluation of the ratings for each of the 12 national watershed condition indicators.
- What are the potential impacts of the project on forest carbon storage and sequestration? The importance of the carbon currently and potentially stored in the moist forests of western Washington was one value that the Northwest Forest Plan did not take into account, but we certainly should consider it now. If feasible to determine, we would like to know how much forest carbon is currently stored in the project area, how much carbon would be emitted by the proposed logging, and what would be the net effect on forest carbon storage/sequestration in the short- and long-term.
- How will the project affect the ability of the North Cascades terrestrial and aquatic ecosystems to adapt to anticipated climate change impacts?
- What are the potential effects of the project on at-risk species? Could the project exacerbate climate change impacts by adding stressors?
- Do the Matrix lands contain late successional and old growth forests? If so, would any of them be logged? We understand from our June 22 meeting that most of the Matrix portion of the project area was previously clearcut starting about 70 years ago, but there are also four stands of late-successional, 120-year-old naturally regenerated forests in the Matrix. We encourage the Forest Service to carefully consider what type of vegetation management is appropriate in those ecologically valuable late-successional stands in light of the purpose and need for the project, including the need to “contribute to the local economy in a way that sustains both local industry and forest resources.” Also, please note that the Northwest Forest Plan prohibits cutting of late-successional forest if it is in a fifth-field watershed where 15 percent or less of the federal forest land is late-successional forest (NWFP, p. C-44).
- Will any harvest occur in inventoried roadless areas?
- Will any harvest occur in the corridor of a river segment identified as eligible or suitable for inclusion in the National Wild and Scenic Rivers System? If so, how will the Forest Service ensure harvest enhances the Outstandingly Remarkable Values of the eligible or suitable river segment? How will the Forest Service ensure the classification (wild, scenic or recreational) of any Wild and Scenic eligible or suitable river segments will not be downgraded in classification?

- How much road construction/reconstruction would occur, and where would those roads be located? Please note that the Northwest Forest Plan limits road construction within Key Watersheds, specifically by requiring that “there will be no net increase in the amount of roads in Key Watersheds” (NWFP, p. B-19).
- Does the Mount Baker-Snoqualmie roads analysis identify any unneeded roads in the project area? If so, those roads should be considered for decommissioning in the project EA. Please note that the Northwest Forest Plan calls for reducing the amount of roads in Key Watersheds (NWFP, p. C-7).

Thank you for considering our scoping comments. We look forward to working with you in developing this project on a collaborative basis and consistent with the Northwest Forest Plan and best available science.

Sincerely,

Megan Birzell
Washington State Director
The Wilderness Society

Tom Uniack
Executive Director
Washington Wild

Tom O’Keefe, Ph.D.
Pacific Northwest Stewardship Director
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Wendy McDermott
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