To: Erin Uloth, Mt Baker RD District Ranger

Cc: Andrew Montgomery, NEPA Planner

From: WRIA 1 Environmental Caucus

Re: Response to Scoping for North Fork Nooksack Vegetation Management Project

6-28-2020

Dear USFS Staff

The Environmental Caucus is a member of the Water Resource Inventory Area No. 1 (WRIA 1) Watershed Management Project Planning Unit. We envision a future Whatcom County where our community is unified in restoring and protecting a resilient ecosystem as our highest priority. Members of the Environmental Caucus include nonprofit organizations, community groups, and individual citizens in Whatcom County. We do not speak on behalf of the WRIA1 Planning Unit.

Thank you for the opportunity to comment on the information so far provided to the public. We have numerous questions and anxieties about how the proposed work might affect the river, its tributaries, and salmon habitat. We would appreciate the opportunity to remain involved as the project takes shape. We live near and recreate in this area and it is a very important place to us.

We support efforts to increase forest resilience in the face of climate change-related environmental changes and disturbance regimes, increase wildlife habitat quality, and we certainly want to support enhancing public access. However, we are concerned that the work will raise landslide potential in these very landslide-prone areas, degrading, rather than protecting and or improving salmon habitat. You have not given us much information about how you propose to harvest, and it is difficult to get very specific without it. However, these are our concerns as well as we can define them now.

1. There is a very large acreage proposed for possible stand regeneration (“1861 acres Stand Regeneration or Commercial Thinning). How do you decide which units shall receive which treatment? To the extent that this means clearcutting, how does this foster a more fire/insect-resistant, diverse forest? You state the objective is to develop early seral habitat. Why? We are used to clearcuts being replanted with a single species only. How will that produce forest tree species diversity? How large will the clearcuts be? What is the risk to adjacent stands from windthrow?
2. How do these clearcuts affect landslide risk? Landslide and flood risk should be a very large concern in this planning process, especially for Canyon Creek, where a large proportion of the matrix lands appear to be in landslide-prone areas. What provisions will there be for slope stability analysis in these areas?
3. Please use the most recent scientific information available to analyze how proposed clearcutting will affect snowmelt and rain-on-snow high flows. Lots of investment has gone into the Canyon Cr fan area to protect it against debris flows and improve salmon migration. How will the harvest affect those investments?
4. We are concerned about increases in soil erosion and slope stability from log haul and from the new road construction which appears to be on or around the Jim Creek earthflow. How will the New Road Construction improve these conditions? Will all active roads in the Project Area be brought up to current USFS Road Standards? Will all Inactive Roads in the area be either formally Abandoned or brought up to current Forest Road Standards?
5. Aquatic habitat has been seriously damaged by flooding and slides after harvests in the mid-late 20th century. How will this harvest affect stream stability, sedimentation and salmon spawning and rearing habitat? Will you be reopening closed roads for log haul? How will you protect water quality when thinning in Riparian Reserves? How will you protect aquatic habitat as you replace the Thompson Cr Bridge on FR 39?
6. How will the land cover changes affect water storage? Will the nature, timing, sizes and sequencing of various forest practices contribute to, minimize or exacerbate rain on snow event impacts. Given the expected shift from snow- to rain-dominated winters as the climate changes, how does the harvest affect soil compaction, soil erosion, salmon reed scour and rainfall retention? Lots of investment is happening in the lower Nooksack watersheds to improve low-flow conditions. Are your harvest units designed to support that effort?
7. We are concerned about habitat fragmentation in the lower-elevation mature forest areas. You do not mention this issue among issues this project will address. Please include an analysis of how the project will affect habitat continuity. We hope you are working cooperatively with DNR and other landowners in the lower Canyon Cr watershed to improve LSR. Also, we understand there is a possibly-occupied marbled murrelet nest site in the Canyon Cr basin. Is this current information, and if so, how will it be protected? Are there other murrelet nest sites in the project area?
8. Some of the commercial thinning is planned for MA 15, mountain goat habitat. How will this improve habitat for mountain goats? Will Non-Commercial thinning prioritize the selection of leave trees to restore tree and plant communities ecologically appropriate to specific sites?
9. You propose non-commercial thinning in mountain hemlock stands, stating that there is a need to enhance habitat for huckleberries. What is this based on? Aren’t these areas to be managed for LSR? We assume thinned trees would be left on the ground. How will this affect fire hazard in these stands? Does this imitate traditional pre-European land management practices? Is it sustainable or will we need to enter these stands again and again to sustain huckleberries? How does it affect mountain goat and elk habitat?
10. You list two 25-year old watershed analyses as background documents. We are concerned that using such old documents may impair the quality of your impact evaluation. Please update your scientific references and condition assessments to improve public confidence in this EA. We hope more is known about fish and wildlife use of these watersheds now than was known in 1995.

Kim Clarkin and Jim Hansen

WRIA 1 Environmental Caucus Representatives