



**Skagit Audubon Society**

P.O. Box 1101  
Mount Vernon, WA 98273

June 30, 2020

District Ranger Erin Uloth  
Mt. Baker-Snoqualmie National Forest  
Mt Baker Ranger District  
810 Highway 20  
Sedro-Woolley, WA 98284

Re: Scoping comments on *North Fork Nooksack Vegetation Management Project*

(Submitted via email to [comments-pacificnorthwest-mtbaker-snoqualmie-mtbaker@usda.gov](mailto:comments-pacificnorthwest-mtbaker-snoqualmie-mtbaker@usda.gov))

Dear Ranger Uloth:

We are writing on behalf of Skagit Audubon Society to offer scoping comments on the proposed *North Fork Nooksack Vegetation Management Project*. Our Audubon chapter's 276 member families share our group's mission of preserving and restoring wildlife habitat with an emphasis, but not exclusive focus, on birds. We visit many parts of the Mt. Baker-Snoqualmie National Forest, including the general project area, during the course of our chapter's activities. In recent summers, for example, our weekly hiking group has visited Yellow Aster Butte, Hannegan Pass and Skyline Divide, among other places in the area. The emphasis of the proposed project on forest and wildlife habitat restoration makes it of particular interest to us.

Please accept the following comments for consideration as you prepare the environmental review.

Connector Road: environmental effects and mitigation for new road miles

We note that one element of the project is to build 0.6 miles of new road to bypass the "Jim Creek Slide," which has been a problem in maintaining road access to the Canyon Creek watershed. We know that this access is important to facilitate forest restoration activities, including those proposed in the present project plan, and also for recreational access to trailheads. It appears from the map provided with the scoping letter that part of this road would be in Late Successional Reserve in an area proposed for commercial thinning. We are aware that Mt. Baker-Snoqualmie National Forest has more miles of road than the agency has staff or funds to maintain and has gone through a lengthy planning process to identify what roads are needed and which should be closed and rehabilitated. We request that the environmental review for the present project include analysis of the likely effects of this road on the habitat quality of the forest through which it would be built and on nearby streams and also consider mitigation in the form of removing an at least equal length of road in the Canyon Creek watershed. Perhaps this is already part of the thinking for how timber revenues from the commercial thinning would be used to further restoration.

Thinning Late Successional Reserve to hasten development of old growth conditions

We note that a stated purpose of the proposed project is to improve habitat for the Spotted Owl and Marbled Murrelet in Late Successional Reserves by thinning and thereby hastening the

~ to conserve and restore natural ecosystems, focusing on birds, other wildlife, and their habitats for the benefit of humanity and the earth's biological diversity ~

growth of the remaining trees to the size typical of habitat supporting these listed species. Skagit Audubon last commented on this type of project in 2012 and 2013 when the Mt. Baker-Snoqualmie National Forest staff developed a project in the Finney Creek Adaptive Management Area to experiment with different approaches to thinning for the same purpose. We understood at that time there was more than a little disagreement among forest ecologists as to the effectiveness of thinning for this purpose, though it was too early to tell from experience anywhere in the Northwest. We request that the environmental analysis for the present project include and describe consideration of various approaches to thinning for the stated purpose of enhancing habitat based on the latest science and clearly explain the reasoning behind whatever approach or approaches you choose to use. As with the Finney project, we ask that you leave trees that already have potential murrelet nest platforms due to mistletoe or other causes.

#### Economic benefits to the local timber harvest and milling economy

We ask that the discussion of thinning include explanation of how much weight is being given in these choices to the likelihood that logging companies will bid on a given commercial thinning sale in the project area. We realize that providing economic opportunity for the local forest products industry is also a goal of such projects and that thinning for forest restoration is unlikely to happen at all if a sale does not attract bidders.

#### Timely surveys for active Spotted Owl territories and Marbled Murrelet nests

We assume that the areas proposed for thinning or clearcutting were surveyed for occupied Spotted Owl territories and Marbled Murrelet nests before being included in the project plan. According to the project information, it may be 2022 before project work begins on the ground. We request that environmental review of the project provide for resurveying for these species before any thinning, harvest, or road work takes place so that these specially protected and vulnerable species are not impacted by old and inaccurate information about the areas they are using.

#### Stand Regeneration in Riparian Reserve

We note that the area designated in the project for "Stand Regeneration" treatment includes 575 acres of "Riparian Reserve." We understand that, under the Northwest Forest Plan, "Riparian Reserve" is a designation on top of other management designations such as "Late Successional Reserve" or "Matrix" lands, and we assume that "Stand Regeneration" treatment means clearcutting. We further understand that thinning is permissible in Riparian Reserve, but it sounds contradictory that clearcutting, even with the stated 40-acre limitation per clear cut, could be allowed in an area designated "Riparian Reserve." The riparian problems on the overcut Finney Block come to mind. How can clearcutting be done in a riparian area without adversely impacting streams? Because of potential negative impacts to salmon reproduction and on other aspects of the aquatic ecosystem, we are strongly opposed to clearcutting in riparian areas.

#### Enhancing carbon sequestration

As seen in state legislation passed during the last session in Olympia and in other ways, there is increasing recognition of the importance of forests for carbon sequestration as part of a "natural solution" to the climate crisis. We know there are differing opinions on whether

younger or older trees contribute more to this goal. In preparing the environmental analysis of this project, please study and report on the direct, indirect, and cumulative effects on carbon sequestration and greenhouse gas emissions of the proposed clear cuts and, for the areas to be thinned, the varying effects on carbon sequestration over time of different approaches to thinning.

Thank you for the opportunity to comment in the scoping phase of the proposed project. Please keep us informed about future opportunities to study the proposal and comment on it using the following contact information: Skagit Audubon Society at P.O. Box 1101, Mount Vernon, WA 98274 or [conservation@skagitaudubon.org](mailto:conservation@skagitaudubon.org) or 360/333-8985.

Sincerely,

/s/Jeff Osmundson

Jeff Osmundson  
President  
Skagit Audubon Society



Timothy Manns  
Conservation Chair  
Skagit Audubon Society