

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

Re: North Fork Nooksack Vegetation Management Project

Sent Via Email

June 30, 2020

Dear District Ranger Uloth,

Please accept these scoping comments on the North Fork Nooksack Vegetation Management Project #58218 from Washington Environmental Council (WEC). WEC is a nonprofit, statewide advocacy organization that has been driving positive change to solve Washington's most critical environmental challenges since 1967. With over 34,000 members, WEC acts to protect, restore, and sustain Washington's environment for all. Our policy work focuses on climate, clean energy, forestry, and Puget Sound, with specific involvement in habitat conservation and the protection and recovery of marbled murrelets, salmon, and orcas.

This comment letter expresses our concerns regarding the scoping of the North Fork Nooksack Vegetation Management Project. In addition, we support the detailed comments and recommendations submitted by Conservation Northwest, and point you to their June 23rd comment letter for reference.

In general, any vegetation management project in the Nooksack watershed should employ a holistic approach to improve whole ecosystem and landscape resilience and function. The Nooksack Integrated Conservation and Enhancement project (NICE) took this path, and should replace the North Fork Nooksack Vegetation Management Project. At the very least, the objectives, values, and landscape-level restoration approach of the NICE project should be incorporated into any management project in the Nooksack watershed. These values include:

- Protection of the cultural heritage and treaty rights
- Protection of federally endangered species and their habitats
- Ensure stable and/or thriving populations of plant, fish, and wildlife across the landscape
- Improve and maintain water quality
- Resilient forests and forest health
- Having a forest that can support the uses and needs of people

For all vegetation treatments on the landscape, it should be explained how they will protect or enhance habitat for Puget Sound Chinook, Puget Sound steelhead trout, bull trout, northern spotted owl, marbled murrelet, grizzly bear, gray wolf, mountain goat, elk and deer. Negative impacts to these or any additional sensitive, threatened, and endangered species must be described.

Of particular concern is the proposed 1,900-acre regeneration harvest in the Canyon Creek area. Canyon Creek provides salmon habitat, carbon sequestration, and other vital ecosystem services. Activities in this area should demonstrably improve the ecosystem's condition and function, especially due to its importance as habitat for endangered fish. Conversely, a substantial regeneration harvest such as this one is likely to further degrade water and habitat quality, particularly because of the area's steep, unstable slopes and history of landslides and flooding.

Management in Canyon Creek should prioritize reducing road densities, improving large tree and old growth habitat, reducing fragmentation of old forests, improving wildlife habitat, and increasing resilience to climate change. Any silvicultural treatments aimed toward development of early seral habitat should be sure to create *complex* early seral habitat, and include the retention and preservation of biological legacies, stands over 80 years of age, stands not previously harvested, and young stands that are already structurally complex. In addition, no regeneration harvest should occur in Riparian Reserve areas.

Any new road creation should be accompanied by the decommissioning of unstable, decaying roads. More extensive road decommissioning should be incorporated into this plan to increase security habitat, and logging units within the Mt. Baker Roadless Area should be removed from the proposal.

Variable density thinning in Late Successional Reserves to create old forest characteristics should be sure to retain species and structural diversity, large trees, and biological legacies. Details on specific thinning goals, practices and locations must be explicitly stated in project design, including explanations for how thinning harvests will avoid impacts to wildlife—particularly with respect to marbled murrelet and northern spotted owl nesting habitat.

Management actions in the North Fork Nooksack River watershed must take into account the watershed's role as vital habitat for bull trout, steelhead, Chinook, coho and pink salmon. Actions should build on and support investments to address flood damage and improve watershed conditions in Whatcom County. Timber harvests and consequent increased soil erosion bring a high potential for greater damage to the watershed's aquatic system, due to its already high landslide and mass wasting risk, unstable slopes, and the increasing frequency of rain-on-snow events.

The project must prioritize and describe in detail how any vegetation treatments proposed will achieve the following:

- Maintain and restore watershed and landscape connectivity, complexity, and diversity
- Maintain and restore water quality, physical integrity, and sediment regimes
- Protect the timing, duration, levels, and distribution of in-stream flows
- Maintain and restore the species composition and diversity of riparian and wetland plant communities



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- Maintain and restore habitat to support healthy and robust populations of native plants, invertebrates, and vertebrate riparian-dependent species

Thank you for the opportunity to comment on the North Fork Nooksack Vegetation Management Project scoping process. Please return to a more holistic, landscape-scale restoration project plan that addresses and remedies the above concerns as well as those further outlined by Conservation Northwest.

Sincerely,

Lisa Remlinger
Chief Policy Officer