

To: Erin Uloth, District Ranger  
Mount Baker Ranger District  
Mount Baker-Snoqualmie National Forest  
810 State Route 20  
Sedro-Wooleey, WA 98284

Transmitted Electronically Via:

<https://cara.ecosystem-management.org/Public//CommentInput?Project=58218>

July 1, 2020

**RE:** North Fork Nooksack Vegetation Management Project #58218

Dear District Ranger Uloth,

Thank you for taking the time to consider our comment on the proposed Vegetation Management Project to occur in the North Fork Nooksack watershed.

RE Sources is a non-profit organization located in northwest Washington and founded in 1982. We work to protect the health of northwest Washington's people and ecosystems through the application of science, education, advocacy, and action. Our priority programs include Protecting the Salish Sea, Freshwater Restoration, Climate Action, and Fighting Pollution—all critical issues affecting our region. Our North Sound Baykeeper is also a member of the Waterkeeper Alliance, with over 300 organizations in 34 countries around the world that promote fishable, swimmable, drinkable water. RE Sources has thousands of supporters in Whatcom, Skagit, and San Juan counties, and we submit these comments on their behalf.

We appreciate the restoration efforts that are included in this project that will rejuvenate and regenerate forested land and riparian zones that will undoubtedly lead to increased ecosystem functions. We are concerned, however, about the sheer magnitude and scale of the proposed logging on matrix land and ***we are requesting that a full Environmental Impact Statement (EIS) be performed.***

In keeping with the original intent of the Northwest Forest Plan, an ecosystem approach should be taken in the management of this Tier 1 Key Watershed. As currently described, however, the Vegetation Management Project could intensely harvest (by commercial thin and stand regeneration) on up to 3,678 acres containing sensitive and critical habitat. As such, the plan erroneously places timber revenue over ecosystem protection. Regenerative harvests, also known as clearcuts, dramatically change the environment and have little environmental benefit.<sup>1</sup> We strongly encourage the Forest Service to reduce or completely remove stand regeneration harvests from this plan and instead employ more

environmentally sound harvesting regimes. For example, a thinning regime that creates an uneven-age structure could simultaneously protect habitat and generate revenue.<sup>2</sup>

We are also concerned that the documents used to evaluate and plan for this management are over 20 years old (North Fork Watershed Analysis, Canyon Creek Watershed Analysis, and NW Forest Plan) and do not adequately reflect the current needs of our environment. Despite the implementation of these ecosystem approaches to management, salmonids, amphibians, and other sensitive species continue to decline in the Pacific Northwest.<sup>3</sup> This indicates that these management strategies are failing and that more aggressive measures need to be done to ensure critical habitat is maintained. In addition, climate change projections have changed immensely in the last 20 years, and the need for carbon sequestration and sinks are more important now which is another argument to keep as many trees alive and viable as possible. Best available science is also emerging on the impacts of younger forests on the hydrological cycle and higher evapotranspiration rates compared to older or old growth stands.<sup>4,5</sup> This should be a concern for the Forest Service and Whatcom County as a whole given that Canyon Creek and the other areas in this proposal are headwater watersheds and streams to the mainstem Nooksack River where regulated flows are not met in the summer and early fall.

In our assessment, the scoping document does not adequately address our concern about the creation, care, and decommissioning of logging roads in the watershed. It has been long known that logging roads are major contributors of sediment to creeks and waterways as well as invasive species.<sup>6</sup> We believe there should *not* be an overall increase in the number of logging roads in the watershed, especially given strained Forest Service maintenance budgets. Please clarify how the Forest Service plans to manage new and old roads in this watershed.

Carrying out intensive logging could have negative impacts on other land uses such as tourism, recreation, hunting and fishing (both recreational and subsistence), and spiritual use. Many of these land uses also bring considerable revenue to the local communities without causing harm and irreparable damage to the forest. These land uses should be considered when evaluating the long-term economic and environmental viability of this watershed.

RE Sources encourages the Forest Service to be transparent and clear with the public in regards to the management plan. Incorporating large scale clearcuts and commercial thins with road and bridge work alongside restoration efforts muddles the overall scope and objectives of this plan. In addition, calling clearcuts “Stand Regeneration” and including them in the umbrella term “Vegetative Management” can be confusing and misleading for the general public. Because of this, many of our supporters have reached out to us for help in interpreting this project plan.

Based on the volume of comments already received by the Forest Service and the amount of interest our supporters have shown, it is evident that the community is very concerned

about this proposed project. This level of interest and potential for environmental impacts warrants an Environmental Impact Statement. We thank you for taking the time to read and address all the comments and concerns in these letters, including ours.

Sincerely,

Karlee Deatherage  
Land and Water Policy Manager

Kirsten McDade  
Pollution Prevention Specialist

References:

<sup>1</sup>Chen, J., Franklin, J.A., Spies, T.A. (1995). Growing season microclimatic gradients extending into old-growth Douglas-fir forests from clearcut edges. *Ecol. Appl.*, 5 (1995), pp. 74-86.  
[https://doi.org/10.1016/0168-1923\(93\)90061-L](https://doi.org/10.1016/0168-1923(93)90061-L)

<sup>2</sup>Miller, M., Emmingham, W. (2001). Can Selection Thinning Convert Even-Age Douglas-Fir Stands to Uneven-Age Structures? *Western Journal of Applied Forestry*, Volume 16, Issue 1, pp. 35-43.  
<https://doi.org/10.1093/wjaf/16.1.35>

<sup>3</sup>IUCN 2020. The IUCN Red List of Threatened Species. Version 2020-1. <https://www.iucnredlist.org>.  
Downloaded on June 29 2020.

<sup>4</sup>Perry, T.D., and J.A. Jones. 2016 *Summer streamflow deficits from regenerating Douglas-fir forest in the Pacific Northwest*, USA. *Ecohydrology* 2016:1-13. doi:10/1002/eco.1790.

<sup>5</sup>Moore GW, Bond BJ, Jones JA, Phillips N, Meinzer FC. *Structural and compositional controls on transpiration in 40- and 450-year-old riparian forests in western Oregon, USA*. *Tree Physiol.* 2004;24(5):481-491. doi:10.1093/treephys/24.5.481

<sup>6</sup>Beschta, R. L. ( 1978), Long-term patterns of sediment production following road construction and logging in the Oregon Coast Range, *Water Resour. Res.*, 14(6), 1011– 1016,  
doi:10.1029/WR014i006p01011.