

March 27, 2021

Dear District Ranger Uloth,

My name is Brel Froebe. I'm a resident of Whatcom County, WA and I have a strong investment in the health of this bioregion. After reading the Environment Assessment of the North Fork Nooksack Vegetation Management Project, I feel strongly that between the 2 Alternatives proposed, Alternative 1 is an unacceptable choice since it is the Alternative that implements clearcutting, a.k.a. "stand regeneration." Clearcutting is a destructive and obsolete practice that the U.S. Forest Service should no longer utilize under any circumstances in the 21st century. Clearcutting should not be a part of the Nooksack Vegetation Management Project for the following reasons:

- 1) *Clearcutting adversely impacts climate change:* it has been well researched that clearcutting destroys trees which are our most effective carbon sequestration tools to combat climate change.¹ Studies have also shown that clearcutting destabilizes carbon in soil and results in the release of significant amounts of carbon dioxide.² We need to be planting more trees and sequestering carbon through our soil, not clearcutting trees and destroying soil.
- 2) *Clearcutting degrades water quality and destroys salmon habitat:* we are already seeing a dramatic decrease in many salmon populations. Through decreased water quality caused by erosion, logging in riparian reserves, and increased temperatures due to increased summer flow, salmon could be some of the most negatively impacted species by Alternative 1.
- 3) *Clearcutting negatively impacts summer and winter river flow:* studies show that clearcutting often results in a severely decreased river water flow in summer months and increased flow in the winter.³ This could contribute to landslides and flooding in the winter, and reduced water supply and diminished fish habitat in the summer.
- 4) *Clearcutting contributes to erosion:* studies show that new road construction, like the 2 miles proposed in both Alternatives, and clearcutting increase erosion and the likelihood of landslides.⁴ This could cause human and ecological destruction on a massive scale like the Oso landslide, which has been determined to be caused by logging.⁵

Land in this Vegetation Management Project is habitat for protected species such as the marbled murrelet, northern spotted owl, and Puget Sound salmon. An Environmental Impact Statement should be conducted that explains how future plans will **improve** habitat for these

¹<https://www.theguardian.com/environment/2019/jul/04/planting-billions-trees-best-tackle-climate-crisis-scientists-canopy-emissions>

² <https://www.sciencedaily.com/releases/2016/04/160415125925.htm>

³ <https://andrewsforest.oregonstate.edu/sites/default/files/lter/pubs/pdf/pub4981.pdf>

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<https://pubs.geoscienceworld.org/gsa/geology/article-abstract/3/7/393/192245/Impact-of-clear-cutting-and-road-construction-on?redirectedFrom=fulltext>

⁵ <https://www.nationalgeographic.com/science/article/140722-osu-washington-mudslide-science-logging>

vulnerable species. An EIS is also necessary because of the proposed temporary roads and because logging is being proposed in Riparian Reserves. No new roads of any kind should be considered **without** an EIS. Also the fact that the Lummi Nation has already requested an EIS should be reason alone, since they are original stewards of this land and should be consulted and included in all decision making surrounding land use in the Nooksack River watershed. Only after an EIS is completed should alternatives be proposed. However, I strongly urge you to not propose any Alternatives that involve clearcutting and negative environmental impacts from road creation and maintenance.

Thank you for taking the time to read and consider my comments. Please make the right decision that is in service of the people, trees, rivers, and animals that live in the Nooksack River watershed. Put a stop to clearcutting in the USFS, conduct an EIS, and do not choose Alternative 1 for this Management Project.

Sincerely,

Brel Froebe