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First name: Stephen

Last name: Cole

Organization:

Title:

Comments: Please consider these scoping comments for the North Fork Nooksack Vegetation Management Project (NFNVMP).

### 1. Carbon Sequestration

A 2015 U.S. Forest Service report found that the Mount Baker-Snoqualmie National Forest was second only to the Willamette National Forest in terms of total carbon storage for all national forests within the Pacific Northwest(1). The stands proposed for treatment in this project are not considered late-successional / old-growth in terms of their age or structure, but they are becoming mature second growth and no doubt accelerating in their ability to capture and store carbon. The NFNVMP analysis should consider the impact of losing the carbon sequestration benefits of the stands proposed (especially those units identified for Regeneration Harvest which are 50-70 years old).

### 2. Road Connection, Stand Regeneration and Unstable Slopes

The project proposes to build a new connecting road for the Canyon Creek Road and yet proposes stand regeneration (clearcutting) directly below the location of the proposed connecting road (units C90, C91, C92a, C104, C105). Given the history of washouts of this road and in this area, denuding the slopes directly below a road is inviting a larger slide event. The Washington Department of Natural Resources Washington Geologic Information Portal Web Map indicates that the proposed road alignment area sits in proximity to a historical landslide (within the last 150 years). In fact, the south half of the road alignment is at the elevation of the landslide's scarp or beneath the scarp(2).

### 3. Survey And Manage

Nearly the entire project area is within designated critical habitat for Northern Spotted Owl. As one of the food sources for Spotted Owls, I trust that surveys will be conducted for Red Tree Voles since they are one of the species listed under the Survey and Manage Guidelines. According to the Forest Service's Field Guide to Red Tree Vole Nests publication(3), "...Tree voles are associated with old coniferous forests (=80 years old) that are structurally complex, but are often found in young forests (<80 years old), especially in unthinned young forests adjacent to old forest." This exactly describes the project area environment. Surveys for Red Tree Voles should be conducted.

### 4. Impact to Northern Spotted Owl Habitat

While the proposed units of this project are not of late-successional/old-growth stand age, I am concerned of the impacts that thinning and especially regeneration harvests will have on the habitat quality for the Spotted Owl. Research indicates that thinning and fuels treatment can have a negative impact on Spotted Owls(4). Spotted Owls need cover for protection and the reintroduction of gaps and clearings through thinning treatments and clearcuts could negatively impact their existence.

Literature Cited in these Scoping Comments:

(1) USDA Forest Service. 2015. Baseline Estimates of Carbon Stocks in Forests and Harvested Wood Products for National Forest System Units; Pacific Northwest Region. 48pp. Whitepaper.

<http://www.fs.fed.us/climatechange/documents/PacificNorthwestRegionCarbonAssessment.pdf>

(2) Mickelson, K. A.; Contreras, T. A.; Gallin, W. N.; Jacobacci, K. E.; Slaughter, S. L., 2020, Landslide inventory of western Whatcom County, Washington: Washington Geological Survey Report of Investigations 42, 7 p. text, with an accompanying Esri file geodatabase.

[https://fortress.wa.gov/dnr/geologydata/publications/ger\\_ri42\\_western\\_whatcom\\_county\\_landslide\\_inventory.zip](https://fortress.wa.gov/dnr/geologydata/publications/ger_ri42_western_whatcom_county_landslide_inventory.zip)

(3) Lesmeister, Damon B.; Swingle, James K. 2017. Field guide to red tree vole nests. Interagency Special Status and Sensitive Species Program. USDA Forest Service, Pacific Northwest Region and USDI Bureau of Land Management, Oregon/Washington Portland, Oregon. 41 p.  
<https://www.fs.usda.gov/treesearch/pubs/54634>

(4) Stephens, S.L.; Bigelow, S.W.; Burnett, R.D.; Collins, B.M.; Gallagher, C.V.; Keane, J.; Kelt, D.A.; North, M.P.; Roberts, L.J.; Stine, P.A.; Van Vuren, D.H. 2014. California spotted owl, songbird, and small mammal responses to landscape fuel treatments. *BioScience*. 64(10): 893-906.  
<https://www.fs.usda.gov/treesearch/pubs/47145>