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Organization:

Title:

Comments: Comments on North Fork Nooksack Project #58218.

Dear Mt. Baker District Ranger Uloth,

I'm writing to provide scoping comments for the North Fork Nooksack Vegetation Management Project #58218.

I am a strong supporter of forest management and forest health. Clear-cuts are counter-productive forest management tactics and damage forest health in numerous ways. I used to spend time in the North Fork Nooksack River watershed in my youth and am strongly opposed to clear-cutting in this important habitat of the Pacific Northwest. Responsible forest management focuses on careful thinning of dense, young plantations to increase structural diversity, removing unnecessary roads, improving conditions for fish and wildlife, and enhancing recreation site access. Clear cuts run counter to all of this. They obliterate forests and habitat, increase the risk of erosion, runoff and landslides, and they negatively impact wildlife. In the year 2020 there is no reason we should still be pursuing forestry techniques of the 19th century when modern science has illustrated the negative impacts of clear cuts and outlined better forestry practices for us to follow.

The North Fork Nooksack watershed contains vast old-growth forests with more than 1,700 acres of critical spotted owl habitat, the struggling remnant Nooksack elk herd, prime mountain goat habitat, and key wildlife corridors facilitating movement between the Forest, Wilderness areas and the larger transboundary area including wildlands in Canada. This designated Key 1 watershed also provides critical habitat for threatened fish species.

I strongly oppose the massive 1,900-acre clearcut around Canyon Creek that was recently proposed. Canyon Creek is an important North Fork Nooksack tributary known for floods and landslides, and is home to Endangered Species Act-listed Chinook salmon and steelhead as well as bull trout. Nearly the entire area proposed for clear-cutting is classified by scientists as high risk for landslides and erosion, and is therefore designated as a Riparian Reserve where timber harvest is prohibited. Rain on snow events in the recent past have caused extensive damage, costing millions to repair.

Given the extensively degraded aquatic conditions in Canyon Creek, there is a great opportunity here to reduce road densities that drive sediment delivery and flooding, improve large tree and old-growth habitat in riparian and lower elevations, reduce old forest habitat fragmentation, improve wildlife habitat, and increase ecological resilience to climate change (see Canyon Creek watershed analysis). These objectives, which align closely with the Nooksack Integrated Restoration and Enhancement Project, should be the priority actions for Canyon Creek and elsewhere in the Nooksack, not a massive clearcut.

Please reduce the forest road density in deer and elk winter range to two miles of road per square mile of area or less to improve habitat security, and look for other opportunities to reduce the road network in the North Fork Nooksack watershed while responsibly and sustainably supporting outdoor recreation accommodations. There are nearly 60 miles of roads that threaten aquatic ecosystem health that should be considered for removal through this project.

Thank you for the opportunity to submit public comments,

William Trinen