Data Submitted (UTC 11): 7/1/2020 3:33:17 AM
First name: Heather
Last name: MacFarlane
Organization:
Title:
Comments: I'm writing to provide scoping comments for the North Fork Nooksack Vegetation Management Project #58218. First and foremost, this proposed project requires a full Environmental Impact Statement to adequately ensure a full analysis is completed on significant environmental effects.

I do support comprehensive restoration actions to improve forest health and ecological resilience in the North Fork Nooksack River watershed, including removing unnecessary roads and improving conditions for fish and wildlife, but this can be done without huge timber sales under the guise of Late Successional Reserve thinning.

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. Thinning late-successional habitat is not shown to improve species outcomes and in fact can cause an increase in predation. This needs to be examined in a full EIS.

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. 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.

If this work does go forward, 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 limit any logging and construction work so that it does not occur within two hours of sunrise and sunset, during marbled murrelet nesting season. There are nearly 60 miles of roads that threaten aquatic ecosystem health that should also be considered for removal through this project.