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First name: Gary

Last name: Parker

Organization:

Title:

Comments: Thank you for the opportunity to submit comments on the North Fork Nooksack Vegetation Management Project #58218.

I am familiar with this area, having lived in Washington for 68 years and recreated in the North Fork Nooksack watershed since the 1970s.

I understand that in 2018 the Forest Service embarked on a model process to develop a plan to address restoration of this watershed to improve forest health. Needs in this area include decreasing the decaying road network to a more sustainable level; improving stream health; accelerating the development of old or late successional forest characteristics; and repairing trailheads and other recreational accommodations. I further understand that this process has now been supplanted with a proposed 1,900-acre clearcut around Canyon Creek.

For reasons set forth below I oppose the proposed clearcut and believe that ecological restoration of this area is both necessary and desirable, and urge the reconsideration of any decision to abandon or diminish the model process.

The North Fork watershed comprises old-growth forests with more than 1,700 acres of critical spotted owl habitat, a remnant 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.

With regard to the proposed 1,900-acre clearcut, 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. The recent devastating landslide in the Oso area demonstrates the hazards of clear-cutting in such high-risk zones

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.