

Data Submitted (UTC 11): 6/29/2020 7:00:00 AM

First name: Rafael

Last name: Mithuna

Organization:

Title:

Comments: Comments on North Fork Nooksack Project #58218.

Dear Mt. Baker District Ranger Uloth,

I own an organic farm on the North Fork of the Nooksack. I'm writing to provide scoping comments for the North Fork Nooksack Vegetation Management Project #58218.

I have seen a remarkable increase in silt and flooding on the North Fork in the past 4 years. It coincided with the increased clearcutting on the slopes east of North Fork Rd. I have also seen an increase in displaced wildlife as a result of habitat loss by clearcutting, and a drastic collapse of the salmon run as well as loss of the eagles that used to gather along the North Fork during those runs. I also used to fish Canyon Creek and as its condition deteriorated I have ceased to visit it. I am hopeful that the Forest Service will seriously implement restorative management practices to address these issues which are particularly relevant to the larger public interest of restoring habitat for the salmon run.

I support comprehensive restoration actions to improve forest health and ecological resilience in the North Fork Nooksack River watershed, including careful thinning of dense, young plantations to increase structural diversity, removing unnecessary roads, improving conditions for fish and wildlife, and enhancing recreation site access.

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,

Rafael Mithuna