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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.

As an ecologist, and restoration practitioner, 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 and restoring unnecessary roads, which could become part of Mt. Baker's extensive trail system; improving conditions for fish and wildlife--including wildlife which has been historically expatriated from the area due to economic interest; and maintaining current recreation site access or improving it as mentioned above.

My understanding is that 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. As you likely know, edge effect can impact all of these animals and increased logging will increase the edge effect, while removing unnecessary roads can decrease the impacts of edge effect. This designated Key 1 watershed also provides critical habitat for threatened fish species, including those that are key to the survival of the Southern Resident Killer Whales--for which Governor Inslee has developed a task force to try and protect.

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.

Given the extensively degraded aquatic conditions in Canyon Creek, there is an opportunity here to reduce road densities that drive sediment delivery and flooding; improve large tree and old-growth habitat in riparian and lower elevation; reduce old forest habitat fragmentation thus reducing edge effect; improve wildlife habitat, in particular for anadromous fish; 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.

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,

Liz Clift