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Organization:

Title:

Comments: Comments on North Fork Nooksack Project #58218.

Dear Mt. Baker District Ranger Uloth,

With this e-mail I am providing scoping comments for the North Fork Nooksack Vegetation Management Project #58218.

I am a professional ethnobotanist and ecologist trained in forestry. I strongly support comprehensive restoration actions to improve forest health, ecological resilience, and carbon sequestration potential in the North Fork Nooksack River watershed. Forest management activities that can help achieve these goals include careful thinning of dense, young regenerating stands (whether of plantation origin or natural recruitment) to increase structural diversity; removing unnecessary, underutilized, or poorly sited roads; improving conditions for fish and wildlife, especially old growth and mature forest-dependent species; and reducing impacts of recreational activities (by far the most important public use of the Mt. Baker-Snoqualmie National Forest) .

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

I resolutely oppose in the most emphatic terms possible the massive 1,900-acre clearcut proposed around Canyon Creek. This is the worst management proposal for the Mt. Baker-Snoqualmie National Forest that I can remember for at least the last 20 years. It represents a major step backwards for ecosystem management of the Forest.

Canyon Creek is an important North Fork Nooksack tributary is home to Endangered Species Act-listed Chinook salmon and steelhead as well as bull trout. Canyon creek also runs through a geologically unstable landscape characterized by high annual precipitation, steep slopes, and tectonic activity. Unsurprisingly given these conditions, 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. A 1,900 acre clearcut in this environment makes no ecological or environmental sense whatsoever, and is likely to produce negative impacts that contravene ecosystem management principles.

Current aquatic conditions in Canyon Creek are already degraded. Instead of large-scale clearcutting that puts the watershed at further risk, I request that you pursue opportunities at Canyon Creek to reduce road densities that drive sediment delivery and flooding; improve large tree and old-growth habitat in riparian zones at lower elevations; reduce old forest habitat fragmentation; improve wildlife habitat; and increase ecological resilience to climate change (please see Canyon Creek watershed analysis prepared by your community partner, Conservation Northwest). These objectives align closely with the Nooksack Integrated Restoration and Enhancement Project. These should be the priority actions for Canyon Creek and elsewhere in the Nooksack, not a massive clearcut.

A clearcut of this size, scope, and location does not align with the management priorities or ecological sensibilities held by the majority of the Mt-Baker Snoqualmie National Forest users, and does not support

ecosystem management goals. Please do not pursue the proposed clearcut.

Thank you for the opportunity to submit public comments,

John Tuxill