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Organization:

Title:

Comments: Comments on North Fork Nooksack Project #58218.

Dear Mt. Baker District Ranger Uloth,

As a fisherman, farm forester and photographer I am concerned that the Forest Service is not protecting the critical resources with the North Fork Nooksack Vegetation Management Project #58218 and providing the following comments.

The focus of any so called restoration activities must be science based and actually are focused on improving natural forest ecological resilience. This is especially important in the North Fork Nooksack River watershed, including preserving age diversity, removing unnecessary roads, improving conditions for fish and wildlife, and enhancing wildlife habitat. The activity must not be targeted at just getting out the cut no matter the cost or adverse impacts. This is no place for business as usual.

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.

As a farm forester I know the adverse impacts of large clearcuts and 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 such as Chinook salmon, steelhead and 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. Weather related events in the recent past have caused extensive damage, costing millions to repair.

Due to the current degraded watershed and aquatic conditions in Canyon Creek, the road densities must be reduced to preclude sediment, slides and flooding, to protect large tree and old-growth habitat in riparian and lower elevations, to 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 less than two miles of road per square mile of area to improve habitat security, and look for other opportunities to reduce the road network in the North Fork Nooksack watershed. There are nearly 60 miles of roads that threaten aquatic ecosystem health that should be considered for removal through this project.

Thank you for considering and recording my comments as part of the record.

Thank you for the opportunity to submit public comments,

Richard Curtis