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The North Cascades Conservation Council (NCCC), among the foremost defenders of the North Cascades since 1957, is disheartened by the Forest Service's ongoing, aggressively extractionist management shift of late, most recently portrayed in scoping information provided for the North Fork Stillaguamish Landscape Analysis (logging plan). NCCC believes that the modern American public as a whole has four central, long-term needs from the National Forest System: 1) a reliable source of clean and abundant water, 2) meaningful CO2 sequestration, 3) habitat for the full suite of native fish and wildlife, and 4) compatible recreation opportunities. The scoping materials predict utter failure across all four of these priorities. And remarkably, climate change (or any of its synonyms) is mentioned *not a single time* in the scoping letter, which reflects straight-up willful ignorance and negligence on the part of the Forest Service.

This project is transparently an economic development scheme exclusive to the Darrington area, as well as generally to the detriment of other residents of western Washington and to taxpaying citizens of the United States as a whole – all of whom have a direct stake in the long-term ecological integrity of federal lands such as those within the boundaries of the MBSNF. It's distressing that the Forest Service directly consulted with local economic interests in developing this proposal prior to making it known to the interested public at large. Please explain how these prior actions comply with the Federal Advisory Committee Act.

On page 3 of the scoping letter, Northwest Forest Plan ROD D-13 is referenced as allowing reconsideration of the standards and guidelines for Late Successional Reserve (LSR) management in the Finney Adaptive Management Area (AMA). However, a plain reading of D-13 reflects that its overarching context is explicitly linked to recovery of the northern spotted owl (NSO) population, which continues to incrementally decline across the MBSNF without reported exception. Given that the project area heavily overlaps designated critical habitat for both the NSO and marbled murrelet (MM), along with ongoing negative trends for both species, the Forest Service has no legally defensible rationale for revising the existing management emphasis for the LSR component of the Finney AMA toward more commercial logging.

On page 8, the document introduces the concept of condition-based management (CBM), which essentially allows the agency to improvise all manner of significant management activities, including those of the extractive variety, after the NEPA process and public involvement window have closed. In effect, this would mean that the Forest Service would be allowed to manipulate the landscape and waterways with no oversight whatsoever, likely in coordination with commercial interests under contract with the federal government. CBM is clearly in violation of the spirit of NEPA, and may also be in violation of the letter of the law. We are unaware of CBM being tested in court thus far, but it certainly seems ripe for such review, and we strongly advise against it. We think most would agree that a government agency irretrievably committing the public's resources with no knowledge or involvement on the part of the public is a spectacularly bad idea. Even the Forest Service seems to recognize this as it relates to the potential for future road decommissioning, yet with every other type of management activity, the public is expected to just close its eyes/ears and hope for the best. At minimum, CBM is a wide-open door to

government malfeasance and cronyism. If landscape conditions change significantly post-NEPA, yet pre-implementation, the Forest Service must then resume the NEPA process.

Page 9 states that clearcutting (euphemistically termed “variable retention harvest”) would be a feature of this project, along with potential salvaging of blowdown areas. The scoping document then goes on to incongruously state that “when implementing treatment in AMA with LSR emphasis, careful consideration would be made to leave as many stand components directly related to LSR development as possible.” This is not only contradictory, but fundamentally illogical. For one thing, artificial establishment of early seral conditions across LSR and NSO/MM critical habitat is the inverse of well-established management goals for both designations. And where early seral conditions within LSR and critical habitat are created by natural disturbance (windthrow), the Forest Service strangely suggests that this is something to be remedied. Apparently, from the agency’s perspective, the only “good” early seral acreage is that which results from logging, whereas a natural disturbance, with its intrinsic structural heterogeneity and habitat value, is seen as a “waste” if not exploited for commercial purposes.

This sort of through-the-looking-glass reasoning continues into page 10, where the document describes the agency’s intent to create early seral conditions for deer and elk within LSR and NSO/MM critical habitat, up to and including logging within stands up to 120 years of age. It is first important to acknowledge that most if not all stands approaching a century or more in age within the project area are of natural origin, given that the Forest Service’s truck logging program did not begin in earnest until after World War II. An attempt to log natural, maturing stands of this age class within LSR would be a radical departure from nearly three decades of the Northwest Forest Plan, and would necessitate an environmental impact statement in order to minimally study the effects of such a dramatic exit from contemporary and accustomed management emphasis. Moreover, the agency’s desire for more early seral acreage ignores the fact that early seral conditions throughout the multi-jurisdictional Stillaguamish basin are already significantly greater in extent relative to the pre-European settlement baseline. The Forest Service must explain how increasing early seral acreage (i.e., deforestation) even further beyond the historical baseline would interface with applicable federal statutes, particularly the Endangered Species Act.

Judging from pages 12 through 14, it appears that the Forest Service would quite likely complete this project with a higher density of open or at least hardened roads in a tier 1 Key Watershed than is currently the case. As evidence, at the top of page 13 it is stated that “most system roads would remain the same after project implementation.” Along with actively discouraging construction of damaging temporary roads, whose negative hydrologic impacts are realized well before they are eventually “rehabilitated,” as well as reconstruction along vegetated/hydrologically mature road prisms, NCCC strongly recommends more ambitious road decommissioning in order to mitigate the certain damage to water quality, aquatic/riparian habitat, and soil stability that would result from a project of this magnitude. Specifically, we submit the need to put the following roads to bed prior to completion of any semblance of this project: 1800-014, 1800-020, 1820, 1840, 1855, 1860, 1870, 1890 beginning at its 012 junction, 1891, 2800-018, 2800-020, 2820, 2840-016, 2841, 2850, 2940-011, 2942, and 2960.

Continuing with the seemingly Lewis Carroll-inspired nature of this proposal on page 17, NCCC concedes to scratching its head over the proposed trail decommissioning of the Mount Higgins, Myrtle Lake (spur), and Round Mountain trails. If the Forest Service has ever proposed decommissioning a foot trail on the MBSNF without otherwise re-routing it, we are not aware of it. This element is strikingly incongruous with the remainder of the proposal, and suggests that the agency has in mind discouraging a certain user group of note (hikers) from the Finney Block in order to get down to the business of more logging without “206’ers” and the like raising a stink about it. The Forest Service’s stated intent to “restore disturbed areas to a more natural state”

along these trail corridors, juxtaposed with the agency's sanguine outlook towards nearly 500 miles of roads in the project area, is truly dark comedy. NCCC supports traditional, nonmotorized recreation where it doesn't degrade ecological systems and wildlands character, but is not in the trail-defense business. Still, this is frankly weird, and someone needs to say it. Note that the Mount Higgins trail possesses some historical merit, as the access to a long-gone 1926 lookout and old stomping grounds of the likes of the late Walter Higgins and Sam Strom.

Expansion of DNR's mountain bike trail system on North Mountain (pages 17 and 18) onto federal land suggests a similar, anti-hiker mindset for the Finney block. To the extent that these trails are overrun with speeding wheels, as seems likely, few if any foot travelers would dare visit. This, too, seems wholly intended to serve as a jolt to the Darrington economy, an idea apparently developed by a local elite with privileged access to the Forest Service, while the millions of taxpaying residents up and down the I-5 corridor are left to wonder why a large chunk of their public lands is basically being closed off to visitation unless they can afford a \$7,000 bicycle. Similarly, the intent of the "mixed use transportation analysis," where certain system roads would be gated for rec use during the warm months, is explicitly for the benefit of mountain bikers and equestrians. In other words, a playground for the relatively wealthy, who will hopefully leave some cash behind in Darrington. Humans have used their feet to travel these hills since the last glacial advance. But if they have no other means of advanced recreational transportation, then the Forest Service has effectively disinvited them from nearly all of the Finney block, aside from grudgingly allowing a 20-minute stroll around Texas Pond.

Harris *et al*'s "Attribution of net carbon change by disturbance type across forest lands of the conterminous United States" in *Carbon Balance and Management* (2016) concluded that logging in the United States releases five times the CO₂ as wildfire, bark beetles, windthrow, land use conservation, and drought combined. Oregon State University's Beverly Law's research, published by the National Academy of Sciences in 2018, showed that 35% of the carbon emissions in Oregon result from the wood products sector. Moreover, OSU's Polly Buotte and colleagues in *Ecological Applications* (2019) found that wetter western forests, including the MBSNF, have the potential to sequester up to six years of current fossil fuel emissions in the region if left unlogged. The Forest Service cannot continue whistling past this graveyard, nor may it keep waltzing past the potential of the National Forest System to meaningfully help prevent civilization's impending ruin. NCCC asks that an additional action alternative be considered for this project, which foregoes commercial logging activities in favor of CO₂ sequestration; focusing also on decommissioning all but essential trunk roads for enhanced water quality, restoration of aquatic/riparian habitat, and removal of both migration barriers and poaching risks for terrestrial species. NCCC, with its decades of collective knowledge of and experience in the North Cascades, stands ready to help, provided that we're allowed past the federal rope line and into the cozy Finney Block party apparently already in progress.

Jim Scarborough, Board of Directors
North Cascades Conservation Council

Cc;

U.S. Representative Suzan DelBene
U.S. Senator Patty Murray
U.S. Senator Maria Cantwell