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Re: Finney Project

Dear Supervisor Eberlien:

These are comments from North Cascade Conservation Council concern the Finney AMA Management Plan as outlined in the recent EA document.

We strongly urge you not to choose any alternative which rebuilds the former Gee creek road, the decommissioned FS 1707. This road was decommissioned for good reasons, and to rebuild and reopen such a hazardous road for an indefinite period as part of a proposal which purports to improve aquatic conditions in the planning area strikes us as logically absurd The proposed reconstruction of former road 1706 also strikes us as highly questionable.

We note that the commercial logging activities proposed fall in the category of business-as-usual thinning, and two heavier styles of thinning (treatments “A” and “B”). No consideration is given to the possibility of lighter or more irregular noncommercial thinning or tree-felling. If, as we suspect, the business-as-usual thinning “T” uses DXD, then it is a regularizing treatment which does not meet reasonable definitions of variable density; it will certainly not produce the irregular pattern of residual trees depicted in figure 3-16. The Gee creek valley would seem to be an excellent place to contemplate noncommercial thinning or tree-felling given the obvious problems with rebuilding a decommissioned road. The fact that all variant thinning styles proposed involve heavier, rather than lighter logging thn intensity than business as usual strengthen our suspicion that this is at heart just a commercial logging plan, not a defensible plan of restoration activities.

Sincerely,

Rick McGuire
North Cascades Conservation Council