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Comments: The North Cascades Conservation Council (NCCC) has worked to protect and preserve the North Cascades' scenic, scientific, recreational, educational, and wilderness values since 1957. Through our longtime advocacy on the Mount Baker-Snoqualmie and Okanogan-Wenatchee national forests, we are intimately familiar with implementation of the 1994 Northwest Forest Plan and have high interest in ensuring that its proposed amendment meaningfully strengthens protections for terrestrial and aquatic ecosystems in the North Cascades. The collective decades of firsthand observations by NCCC's members of the effects of climate change upon our natural areas further inform our perspective. With this extensive background in mind, we wish to communicate our central priorities for this amendment during the scoping process:

1. Active silvicultural management, timber extraction, and road construction or reconstruction should be prohibited in all types of structurally-complex, mature forest stands on the MBSNF and OWNF. These forests may be operationally defined as having a stand origin date prior to World War II; or alternately, 1940 and earlier. These stands feature biological, structural, functional, and genetic legacies, while otherwise rapidly evolving into the next generation of old growth forests. They offer both high-quality habitat and viable migration corridors for ESA-listed and sensitive species. Typically also, these legacy forests were not replanted, instead regenerating naturally subsequent to wind events, fire events, or nonmodern logging. The Washington State Department of Natural Resources is already well along toward removing such legacy forests from its timber base on state lands, and NCCC strongly advises the U.S. Forest Service to do the same on federal lands via this amendment.

2. Particularly relevant to the east slope forests of the North Cascades, though not necessarily exclusively, the popular concept of "fireproofing" via active management (e.g., thinning) continues to lack scientific consensus and in fact remains a source of considerable controversy within peer-reviewed literature. There is no shortage of evidence that some aspects of active management actually increase the risk of wildfire to adjacent human communities, by way of greater exposure to wind, earlier desiccation of the forest floor each summer, and increased access leading to human-caused fire due to an excessively high volume of open and unmonitored forest roads. Moreover, the notion of active management to reduce wildfire impacts in old growth and mature forests is specious for these same reasons. Such activities fragment and degrade what would otherwise be intact forest, while fire resistance/resilience as the ostensible aim is merely a transparent cover for extraction of greater timber volume. Strangely also, the USFS refuses to acknowledge the established natural history of very large, high-intensity, stand-replacement fires on both sides of the Cascades during the early 20th century and prior. For these reasons, as well as sensitivity toward the federal budget deficit, NCCC advises that all activities designed for fire resistance/resilience be limited exclusively to the immediate wildland-urban interface.

3. The practice of postfire "salvage" logging must be discontinued in perpetuity on the MBSNF and OWNF across all Northwest Forest Plan zonings, wherever new road construction or reconstruction would be required to access burned stands for timber extraction. This prohibition would be based on a well-established body of empirical research which has repeatedly demonstrated the severe damage to fragile soils and water quality which result from salvage logging operations, along with the ever-increasing habitat value to multiple species from postfire landscapes allowed to recover undisturbed through natural successional processes. Postfire timber extraction should be limited to the immediate vicinity of major trunk road corridors and applied conservatively even there, allowing for residual standing snags and accumulation of coarse woody debris, while working with regional tribes for transport of suitable trees which have fallen across the road prism or are anticipated to do so for aquatic restoration purposes elsewhere.

4. Intact and functioning aquatic and riparian habitats, along with the viability of terrestrial wildlife migration corridors, require much greater emphasis on significantly reducing the size of open road networks on both the MBSNF and OWNF than the USFS has been able to muster over the past two decades. An effective and meaningful aquatic conservation strategy will systematically reduce road density across both key watersheds and non-key watersheds, well beyond the modest goals of the original and now largely-obsolete watershed analyses which followed adoption of the Northwest Forest Plan. Similarly, temporary roads constructed for management activities must be obliterated and fully restored to natural hillslope/hydrologic conditions immediately after a given management activity is concluded. It of course follows that newly constructed and reconstructed roads in or across riparian reserves are especially problematic and should be verboten aside from the most strictly-limited circumstances. Additionally, NCCC supports regional tribes' recommendations for expanded riparian buffers across all forms of management activity.