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Comments: Since 1957, the North Cascades Conservation Council (NCCC) has worked to protect and preserve the North Cascades' scenic, scientific, recreational, educational, and wilderness values. Considerable time and effort over the decades on NCCC's part have been dedicated to safeguarding the native forests of our region, including old growth, mature, and naturally regenerated stands. We additionally work to prevent ongoing fragmentation and degradation of all publicly-owned forests across our broad geographic area of advocacy, while encouraging restoration of natural hydrologic conditions via road decommissioning.

NCCC is dismayed and frankly insulted by the Biden administration's release of the Old-Growth Amendment Draft EIS and its proposed Alternative 2. It has become clear that this NEPA process is intended not to protect old growth forests, but to instead invent a regulatory framework that ensures maximum flexibility on the part of the U.S. Forest Service to log these irreplaceable stands wherever it desires to do so. Alternative 2 would require the USFS to merely offer a flimsy pretext (wildfire management, forest health, public safety) prior to resuming its institutional habit of roading and converting native forested ecosystems to lumber for its "partners" who operate the mills.

NCCC rejects proposed Alternative 2 and, by extension, the smoke-and-mirrors quality of what has become a bogus NEPA process. We urge instead that this project be abandoned in its entirety, rather than risking further damage to our already-beleaguered public forests. Regrettably, the USFS has revealed itself to be a rogue, corrupt agency, a fox in the henhouse, unaccountable to the taxpaying public and willfully joined at the hip with the timber industry. Worse, this recurrently abominable agency behavior appears to be quietly sanctioned by the Secretary of Agriculture and Biden administration as a whole.

We instead redirect the administration's wayward attention to the January 31, 2024 letter submitted by over 200 scientists (Birdsey et al), requesting complete protection from logging for all mature and old-growth forests on public lands. This letter, which NCCC fully endorses, has been inexplicably ignored by the administration in its presumed zeal to please its industry "partners" while disenfranchising most if not all dissenting interests. Anything less than these scientists' modest recommendations is a violation of the administration's original and apparently disingenuous pledge to protect these forests.

We also call your attention again to accumulating, peer-reviewed research (see: <https://johnmuirproject.org/wp-content/uploads/2024/04/JMP-fact-sheet-thinning-and-fire-28Feb24.pdf> for a concise summary of historical and modern studies) which demonstrates that thinning to ostensibly reduce forest fuels in fact increases wildfire likelihood and intensity via earlier seasonal drying, increased heat, greater wind exposure, and increased human access due to sprawling, unpatrolled logging haul roads.