



# THE WILD CASCADES

THE JOURNAL OF THE NORTH CASCADES CONSERVATION COUNCIL

SPRING/SUMMER 2024



## THE WILD CASCADES ■ Spring/Summer 2024

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COVER: Tundra vegetation near summit of 8,077 ft. Arnold Peak near Horseshoe Basin, Pasayten Wilderness.—PHIL FENNER PHOTO

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### The Wild Cascades

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#### *Journal of the North Cascades Conservation Council*

EDITOR: Anne Basye

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*The Wild Cascades* Editor

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North Cascades Conservation Council  
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THE NORTH CASCADES CONSERVATION COUNCIL was formed in 1957 "To protect and preserve the North Cascades' scenic, scientific, recreational, educational, wildlife, and wilderness values." Continuing this mission, N3C keeps government officials, environmental organizations, and the general public informed about issues affecting the North Cascades Ecosystem. Action is pursued through administrative, legal, and public participation channels to protect the lands, waters, plants and wildlife.

Over the last six decades N3C has led or participated in campaigns to create the North Cascades National Park Complex, Glacier Peak Wilderness, and other units of the National Wilderness System from the William O. Douglas Wilderness north to the Alpine Lakes Wilderness, the Henry M. Jackson Wilderness, the Chelan-Sawtooth Wilderness, the Wild Sky Wilderness and others. Among its most dramatic victories has been working with British Columbia allies to block the raising of Ross Dam, which would have drowned Big Beaver Valley.

N3C is supported by member dues and private donations. These contributions support the full range of the Council's activities, including publication of *The Wild Cascades*. As a 501(c)(3) organization, all contributions are fully tax deductible to the extent allowed by law. Membership dues for one year are: \$10 (Living Lightly) to \$100.

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Founded in 1957  
SEATTLE, WASHINGTON

## VICE PRESIDENT'S REPORT SPRING/SUMMER 2024

Thanks to so many of you for taking action recently to defend public staffing in the North Cascades National Park.

When the Park Service announced earlier this year that it planned to withdraw all visitor-facing staff from Stehekin, the response was resounding: Within a few weeks, more than a thousand people signed the N3C's petition demanding that the Park Service reverse that decision. Most of the signers wrote impassioned personal comments, describing how much they loved Stehekin and valued the park rangers who have served visitors since the North Cascades National Park was established in 1968.

The outpouring got the government's attention: Within a few months, the superintendent quietly informed N3C board members that two rangers would, after all, be hired to work in Stehekin for summer 2024. This wasn't enough, of course—not nearly enough rangers to keep the Golden West Visitor Center open each day even during prime-time hours, to provide regular ranger talks, be available to dole out camping permits or respond to visitor emergencies. But it was nevertheless a significant victory, achieved through N3C-led collective action.

While the Park Service is underfunded, the amount of money it would take to properly staff the North Cascades is a pittance. Park leadership never claimed that they were withdrawing from Stehekin because they lacked money. Instead, Park Service leadership cynically suggested that Stehekin wasn't worth staffing and that they wanted to privatize visitor services there. The public responded with a resounding "No!" to privatization and "Yes!" to public servants protecting the land Congress set aside in 1968. All of you—N3C members and others who love the North Cascades—put the Park Service on notice that we wouldn't stand for privatization of our park.


This is why the N3C exists: To fight back against destruction of our public lands. We are resisting not only bad Park Service decisions, but also Forest Service logging projects in the Methow and elsewhere. Under the guise of fire protection, the Forest Service is preparing to cut thousands of trees and create miles of logging roads. With your help, we are working to stop these destructive and duplicitous projects.

And check our website to find out more about what else we are doing to defend parklands: <https://tinyurl.com/N3C-Actions>

Watch the "Our Backyard" video that we've recently sponsored to expose the threat that logging poses for the Methow Valley. The URL is on page 4.

But N3C is only as strong as our membership. We are volunteer-led and volunteer-run. Every new member who joins the N3C strengthens our fight to protect our public lands. Because you cared enough to read to the end of my letter, I'm asking you to reach out today to two people you know, who also care about our North Cascades National Park. Ask them to join N3C today, by visiting <https://northcascades.org/join-us/> so we can protect and preserve the North Cascades National Park.

(N3C president Phil Fenner is on assignment in the Pasayten and Methow.)

  
Carolyn McConnell  
N3C Vice President



# N3C Actions

MARCH to JUNE  
2024

*Advocacy carried out by  
dedicated N3C volunteers  
in the last four months to  
protect and preserve the  
North Cascades lands,  
waters, plants and wildlife.*



## DEFENDING WILD AREAS AGAINST DAMAGING INDUSTRIAL USES

**Why it matters:** resource extraction — mining, logging, hydropower — is the most harmful use of public land. N3C strives to save what remains wild, mitigate what's been lost, and restore what's been damaged.

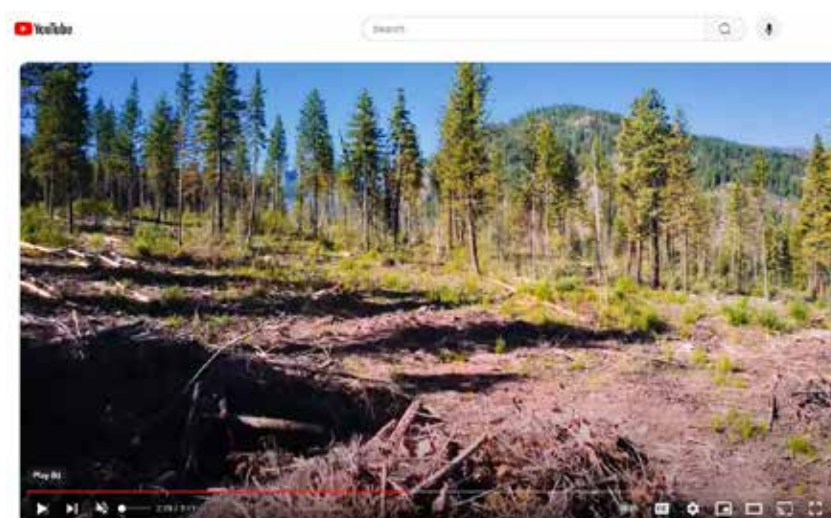
- ✓ Approved Seattle City Light's Skagit Hydro Project FERC license amendment for a Visitor Use Mgmt. Plan (VUMP) from Marblemount to WA Pass in exchange for dropping aesthetic mitigation measure in current license to recoat transmission towers with a color more compatible with the surroundings. (See page 6)



## ESTABLISHING, EXPANDING AND PROTECTING WILDERNESS AREAS

**Why it matters:** federal land designation as Wilderness and Park is the gold standard of ecosystem protection, precluding most damaging industrial and commercial exploitation.

- ✓ Continued to actively monitor and object to helicopters and chainsaws used within Stephen Mather Wilderness in North Cascades National Park Service Complex. (See page 14)



- ✓ Co-sponsored "Our Backyard", a video that exposes the threat that logging poses for the Methow Valley. <https://youtu.be/-C1H6wrbA-so?si=6BqLOt78KcRtLy-D>



## PROTECTING ANCIENT FORESTS AND PROMOTING RESPONSIBLE FOREST MANAGEMENT

**Why it matters:** *like real estate, they're just not making ancient forest anymore. We seek to restore watersheds and fisheries damaged from decades of heavy logging and road building and protect significant forests from degradation.*

- ☒ Filed notice of appeal and opening briefs in Ninth Circuit Court of Appeals for the Twisp "Restoration" (logging) Project (TRP) lawsuit. A decision is expected late this summer. (See page 13)
- ☒ Produced and mailed brochure on Methow logging threats to membership and all addresses in Methow valley.
- ☒ Submitted comments to the Forest Service on the Draft Environmental Assessment of the "Midnight Restoration" (logging) project proposed for the upper Twisp River valley. (See page 13)
- ☒ Signed on to John Muir Project letter opposing the recent endorsement by the Outdoor Industry Association, Outdoor Alliance, and The Conservation Alliance of the Forest Service's plan to treat 50 million acres of forest land over the next decade, which heavily relies on industrial logging.
- ☒ Gave interview to consultants for National Parks Conservation Assn. re. collaborative conservation efforts.



## PROMOTING ENVIRONMENTALLY SOUND RECREATION IN WILD AREAS

**Why it matters:** *balancing access with economics and Wilderness preservation, we evaluate motorized use and places where it needs to be limited to reduce land impacts and recurring road repair costs.*

- ☒ Met with Sen. Murray's staff on Stehekin ranger situation and asked for audience with the Department of Interior. Shared Stehekin staffing petition comments.
- ☒ Asked Sen. Cantwell's office for a meeting re. lack of Rangers in Stehekin.
- ☒ Met with NOCA Superintendent & NPS regional rep re. lack of Stehekin rangers, exploring possible advocacy with Congress.
- ☒ Success! Temporary summer hires have been approved, but a long-term fix is needed. Golden West Visitor Center will stay closed, even if NOCA gets temp Rangers. (See page 3)



## PROTECTING WILDLIFE AND WILDLIFE HABITAT

**Why it matters:** *From microscopic fungi to top predators, the wilderness ecosystem's living members are interdependent, so keeping viable populations of each species is essential to preserve the ecosystem for future generations.*

- ☒ Signed on to letter spearheaded by Center for Biological Diversity requesting increase in FY25 funding for endangered species conservation.
- ☒ Signed on to Sierra Club letter opposing National Environmental Policy Act (EPA) & Endangered Species Act (ESA) reductions included in House Committee on Natural Resources Chairman Westerman's discussion draft, "A bill to expedite under the National Environmental Policy Act of 1969 and improve forest management activities on National Forest System lands...", which makes extreme cuts to NEPA and ESA.

**Want to take actions that protect the North Cascades?**

Join the N3C board.

Contact Phil Fenner for details at  
[philf@northcascades.org](mailto:philf@northcascades.org)



# Yet another update from the Skagit Project Relicensing

By David Fluharty

It appears that we actually are entering the Settlement Phase for the relicensing of the Skagit River Hydroelectric project under the jurisdiction of the Federal Energy Regulatory Commission (FERC). N3C is scheduled to participate in a whole series of meetings over the summer. Phil Fenner and I are covering these discussions for N3C but we, like all License Participants are bound by a commitment to keep negotiations confidential so it is not possible to provide our readers with the highly interesting and consequential discussions. Assuming significant progress over the summer, we may be able to report more in the Fall issue of *The Wild Cascades*. While there are many elements of the Settlement on-license and off-license with which N3C agrees there remain significant issues to be resolved. Stay tuned.

However, we can inform readers about resolution of one of the elements still outstanding from the last license and how it played out. Earlier, we wrote that the one of the remaining requirements of the SCL Skagit Project license in 1995 (based on the Settlement Agreement 1991) was to re-coat the transmission towers that carry the kilowatts from Newhalem to Seattle with colors to help camouflage the towers and reduce their visual impacts on visitors. In the negotiations for the current license for the Project, this requirement was actually proposed by Seattle City Light (SCL), not N3C, as a way to mitigate the impact of the towers creating an “industrial” landscape along the Highway 20 corridor in Ross Lake National Recreation Area (RLNRA). It came about to counter N3C’s proposal to remove the transmission towers and instead to bury the transmission lines underground within the National Park managed areas. As part of the Settlement Agreement for the 1995 License, N3C, NPS, USFS and three Tribes agreed to the Seattle City Light proposal.

Fast forward. For the next 25 years no towers were recoated with camouflage colors. In performance of its oversight responsibilities, FERC reminded SCL and signatory parties, including N3C, that no progress had been made to fulfill this license requirement. SCL responded that the industry practice for maintaining the towers had changed and now recoating would happen only if regular inspections indicated a need to halt corrosion, which they have not. At least one of the signatory parties had changed its mind about the efficacy of painting the towers as a mitigation measure saying that, “It was like putting lipstick on a pig.” SCL was willing, however, to honor its commitment to perform mitigation of the visual impacts of the tower if parties could agree on alternative effective measures. This issue was of increased importance because FERC would not agree to sign off on completion of the current 30-year license unless all provisions were performed or there was agreement among the parties to either drop the requirement or to petition for an alternate solution.

That set off a search for other ways to mitigate visual impacts. Vegetative screening was judged ineffective because the plantings done in 1995-2000 as part of the current license still had not done much to accomplish the task. Other ideas ranged from building CCC-type rock railings along Hwy 20 within RLNRA, construction of more turnouts in river vista areas, digital interpretative guides for visitors, improvements in Colonial Creek Campground, etc. No obvious solution to the visual mitigation opportunity was found. Finally, parties to the agreement did find a way to resolve the issue by reallocating the funding for the recoating of towers to development of an early action Visitor Use Management Plan as described in the letter pasted below.

SCL and N3C along with three tribes, the National Park Service and the US Forest Service agreed to send the following letter requesting the license amendment.

VIA ELECTRONIC FILING

April 2024

DEBBIE-ANNE A. REESE

ACTING SECRETARY

FEDERAL ENERGY REGULATORY COMMISSION

888 FIRST STREET, NE

WASHINGTON, DC 20426

Re: Skagit River Hydroelectric Project, FERC Project No. 553-\_\_\_\_ – Request to Amend Visual

Quality Management Plan

Dear Acting Secretary Reese:

The City of Seattle, Washington, through its City Light Department (City Light), hereby files a request to amend the Visual Quality Management Plan (Visual Quality Plan) pursuant to Article 413 of the license for the Skagit River Hydroelectric Project (Project). Article 413 requires the development of a Visual Quality Plan to implement specified provisions of the 1991 Settlement Agreement on Recreation and Aesthetics. The Visual Quality Plan was approved by the Federal Energy Regulatory Commission (FERC) on December 10, 1996.1 Section 4.2.1.2 of the Visual Quality Plan requires City Light to paint the Project transmission line towers in a less visually contrasting color selected in consultation with interested intervenors. This obligation reflected City Light’s preventative maintenance program for transmission towers that existed in the 1980s and early 1990s, which included recoating of the entire transmission tower.

However, there has been an industry-wide change in best management

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# Welcome new member Fred W. Koontz, PhD

At age 23, Fred, an East Coaster, attended an Outward Bound course in the North Cascades. Summiting Silver Star Mountain cemented his desire to someday return to live in the Pacific Northwest. Thirty-four years later, in 2011, Dr. Koontz realized his cross country move by becoming Field Director for Woodland Park Zoo, a post he held until retirement in 2017. At the Zoo, Fred founded and directed its Living Northwest Program, helping to recover wildlife populations, establish long-term ecological resilience, and empower people of the Northwest to be enthusiastic wildlife conservationists.

Fred has collaborated with the Washington State Department of Fish and Wildlife on species recovery and assisted for a decade as a non-game and habitat advisor. In 2021, Dr. Koontz served on the Washington Fish and Wildlife Commission after being appointed by Governor Jay Inslee.

In retirement, Fred serves as Board President of Wildlands Network, whose mission is “to reconnect, restore and rewild North America.” He advocates for state wildlife agency reform as an Advisor for Wildlife for All, and serves as a Fellow at PAN Works, an ethics think tank dedicated to the wellbeing of animals.

Fred’s earlier career included working at: the National Zoological Park while obtaining a PhD in ethology from the University of Maryland; the Wildlife Conservation Society as Bronx Zoo Mammal Curator; Wildlife Trust as Conservation Director; and the Management Committee of Columbia University’s Center for Environmental Research and Conservation. Fred’s work on a long list of endangered species took him around the world from the US to Latin America, Africa and Asia.

Today, Fred lives with his wife, Wendy Westrom, a retired veterinarian, in Duvall, Washington. Fred joined the North Cascades Conservation Council, “In deep appreciation and respect for the Council’s long history of conservation success.”

## Yet Another Update from the Skagit Project

CONTINUED FROM PREVIOUS PAGE

practices for transmission tower maintenance since that time in favor of targeted recoating at the lower portions of a tower as needed, specifically near the tower footings where steel corrosion is more likely to occur. City Light actively inspects its transmission line system and takes appropriate maintenance and repair actions, including corrosion control coating on the footings of the towers. To reflect the change in industry practice to no longer recoat the entire transmission line system as a routine maintenance measure, City Light proposes to remove this obligation from the Visual Quality Plan.

As an alternative to transmission tower painting, City Light proposes to insert a new provision into the Visual Quality Plan under which City Light will provide funding to the National Park Service (NPS) for development of a Visitor Use Management Plan (VUMP). Broadly speaking, under the plan, the NPS will assess exist-

ing facilities and services within the geographic area between Washington Pass and Marblemount. Through the NPS planning process for the VUMP, the NPS will establish the exact geographic boundary of the VUMP, which at a minimum will include the Ross Lake National Recreation Area (RLNRA) and areas within the Skagit Wild and Scenic River System. The VUMP will also identify improvements and opportunities that will enhance the visitor experience. Recommendations in the assessment will guide investments in future recreation facilities and services in not only the RLNRA, but other locations within the geographic boundary of the VUMP. Upon completion of the VUMP, NPS, the U.S. Forest Service (USFS), City Light, and others will collaborate and coordinate on implementation of these VUMP recommendations.

Chris Townsend, SCL

On April 10, 2024 N3C sent this note of agreement to Seattle City Light:

North Cascades Conservation Council (N3C) acquiesces to your request to amend the Visual Quality Management

Plan Article 413 of the current (1995) license for the Skagit River Project #553 as approved by FERC December 10, 1996. Instead of the requirement that SCL repaint transmission towers we accept that SCL will provide funding to the National Park Service to support development of a Visitor Use Management Plan that will assess existing facilities and services, which at a minimum will include the Ross Lake National Recreation Area and areas within the Skagit Wild and Scenic River in the geographic area between Washington Pass and Marblemount. N3C understands that the geographic area “between Washington Pass and Marblemount” includes the town site and environs of Marblemount and the United States Forest Service Visitor Center and environs at Washington Pass, i.e., that such terminology is not intended to exclude Marblemount or Washington Pass and be limited only to the area “between” the two named waypoints.

N3C is waiting for the bureaucratic approval of this amendment by FERC.

## BOOK REVIEW

### *Forest Under Siege: The Story of Old Growth After Gifford Pinchot*

By Rand Schenck

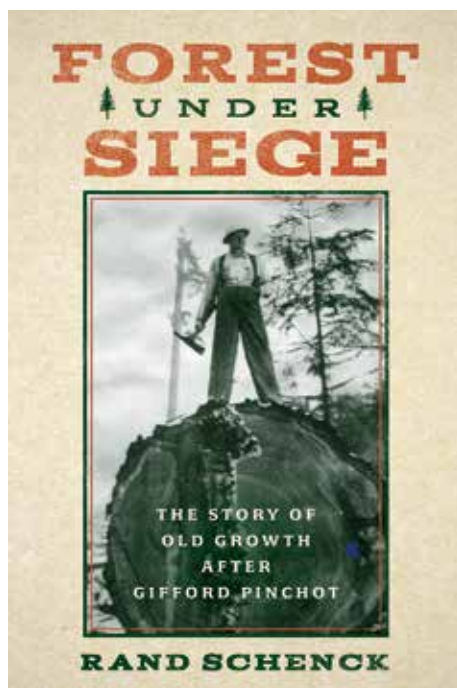
Reviewed by David Fluharty

Basalt Books WSU Press

6x9", 258 pp, \$24.95

Basalt Books, PO Box 645910, Pullman, WA, basaltbooks@wsu.edu  
800-354-7360.

Author Rand Schenck, a longtime environmental activist, has identified an opportune time to describe the cultural shifts in US Forest Service management of the nation's forestlands starting in the late 1900s into the 2000s using the contrast of management philosophies between John Muir characterized as the preservationist and Gifford Pinchot characterized as a utilitarian. The major thesis is that Pinchot's philosophy as an advocate of sustainable use of forest resources is far more compatible with Muir's overall resource philosophy of preservation than most realize. Schenck's argument is that Pinchot, as the first Director of the USFS in 1905, established a regime of the US Forest Service as stewards of the national forests to maintain a sustainable national supply of timber in contrast with what was perceived as the greedy, decimation (cut and run) of private forestlands occurring. Designation of national forests was a way to ensure sustainable forest products. However, sustainable use does not explicitly include preservation as an objective whereas Pinchot and Muir would probably agree that both concepts should be part and parcel of US forest management. The subsequent rejection of the USFS of these concepts led to significant controversy and unnecessary forest destruction. And individually the Hetch-Hetchy controversy is unconvincing as a difference of philosophy between the two protagonists, one promoting preservation and



the other pointing to a balancing of the benefits.

Pinchot's USFS protected the national forests until private forestlands were depleted and then pressure was applied to provide timber from public lands. Despite the Pinchot era strictures and policy, Schenck documents how the concept of scientifically determined sustainable yield became the principal hallmark of the USFS and how it was supplanted by arbitrarily defined "get out the cut" annual goals for national forests forgetting the multiple uses of national forest lands. Schenck argues that Pinchot firmly believed that sustainable use of forest timber would not only be biologically sound policy but also it would perpetuate social benefits in the form of stable economic local economies.

Against this backdrop of the preservation vs use over time, Schenck

demonstrates the conditions under which the USFS strayed away from a balanced view of the multiple benefits of the national forests to a singular emphasis on forests as producer of products for a burgeoning Post WWII economy. Schenck employs the Gifford Pinchot National Forest in South Central Washington State as exemplary of the nationwide trend in increasing the annual quotas for timber harvests in the US once private holdings had been utilized. At that time (1940s-1960s) the national forests were largely old growth forests which a huge standing biomass of old growth, i.e., forests that never had been cut. The huge standing biomass produced high quality products, subsidized road building, and provided increasingly valuable funding for local governments that devoted much of the federal in lieu funding (25% of bid revenue) to schools.

The result of this paradigm shift in management of federal forests was a focus of maximizing the annual quota to produce benefits (jobs, local processing and road building economics, and bid revenues) for local governments while liquidating old growth forests. The economic incentive structure skewed forest management policy away from stewardship for the long term to immediate gratification. Biologically the old growth forests were seen (incorrectly) as decadent, slow growing and needing to be converted to new forests that were perceived as growing more rapidly. Forest science has dispelled much of this false information. Better understanding of the role of old growth forest in combating climate change is showing that old growth forests continue to add significantly to carbon sequestration above and below ground. Conversion to new



forests is not a climate solution. [Note: N3C is on record as calling for the Mt. Baker Snoqualmie NF to be a National Carbon Reserve].

For those who have lived through the post-WWII period in the Pacific Northwest where the USFS's aggressive forest harvest program resulted in roads being punched up to the headwaters of watersheds to ensure that they would not be counted as Roadless Areas for consideration as potential Wilderness, this book introduces and documents an important story. This text only confirms our understanding of what we termed "Wilderness on the rocks." The unbroken young forest you see now was once clear cut 20-50 years ago and will be cut again in your lifetimes. It is a warning. Right now the key arrangements that have slowed the cut from USFS lands, i.e., the Pacific NW Forest Plan, are being reconsidered. It may be that restrictions on harvests of old growth in the Late Seral Class category will be altered.

Why didn't the Multiple Use Sustained Yield Act 1960 or the Forest Lands Management and Planning Act 1976 or the National Environmental Policy Act 1969 make a dent in the excessive forest cut quotas being allocated? These are important topics for discussion.

I would fault the author for not recognizing the current USFS emphasis on fire management by forest restoration (thinning) as the next threat to the USFS adopting an ecosystem based management program. Modern scientific management by law and best available science requires that decision making considers social and economic factors, wildlife, biodiversity, recreation, mining, grazing, water as well as forest product yield. Clearly the present emphasis on fire, thinning for "healthy forests" is a continued focus on harvest as opposed to maintaining a multiple use forest. At a minimum, the USFS must be charged with actual assessment of tradeoffs.

# N3C's position on grizzly bear reintroduction

By Ric Bailey

Our enthusiastic support for the return of grizzly bears to the North Cascades Ecosystem is tempered by our concerns over the process proposed to reintroduce bears, and the management of bears post-placement. N3C cannot support a reintroduction plan that involves intensive use of helicopters in wilderness, and the haphazard killing of reintroduced bears under vague pretenses.

The Final Environmental Impact Statement has been released, and N3C's concerns over the reintroduction process remain.

**Reintroduction Targets:** We feel that an initial population of 25 bears may be insufficient to obtain the 200-bear long-term objective when considering the limited breeding stock, limited potential for breeding with outlying grizzly populations, and the proposal for lethal means of managing grizzlies.

**Reintroduction Process:** Every effort should be made to avoid repeating past reintroduction mistakes. The Fish and Wildlife Service should reduce, if possible, the shock to bears of being drugged, transported, and placed in an unfamiliar location. The causes of mortality from past grizzly reintroduction activities should be identified.

**Sources for Obtaining Grizzlies for Reintroduction:** We believe bears should only be gleaned from places where the existing population is stable and flourishing, and would be expected to remain intact even after the removal of some bears. Bears should not be taken from populations whose primary food source differs from the available food sources in the North Cascades.

**Public Education Program:** A grizzly recovery effort should be accompanied by a more intensive public education campaign than is proposed. It should involve both federal and state government, focusing on communities and popular recreation sites to minimize potentially dangerous

encounters between grizzlies and humans.

**Experimental Population Designation under the Endangered Species Act:** Assessment of whether the existence of grizzlies is compatible with present land uses should have considered that grizzlies were eliminated from their traditional range due to perceived land use conflicts. We oppose the "non-essential experimental" designation for North Cascades grizzlies, which allows lethal control, and instead encourage the implementation of public education measures that reduce human/bear conflicts.

**Human Use Issues:** There should be a distinction between grizzlies threatening livestock on public land open range versus contained livestock on private land. Lethal force should never be used in the open range. The standard for addressing bear interactions with livestock on private land should stipulate that bears may only be relocated if they directly threaten livestock rather than merely being found in areas where livestock are present.

**Helicopters in Designated Wilderness:** The use of helicopters in designated wilderness for reintroduction of grizzlies is an unnecessary convenience that violates the Wilderness Act. There are several locations where bears could be successfully placed with wide geographic coverage using ground-based vehicles on existing, open roads, and/or using helicopters outside designated wilderness.

**Connecting Island Populations:** We remain in favor of measures that can be implemented to facilitate connectivity between grizzly bear populations in the United States and Canada into the future. Connectivity is essential to facilitate inter-population migration to diversify the grizzly gene pool.

The comment period for the grizzly reintroduction plan is over, but N3C will continue to encourage consideration of the concerns we have raised.

## BOOK REVIEW

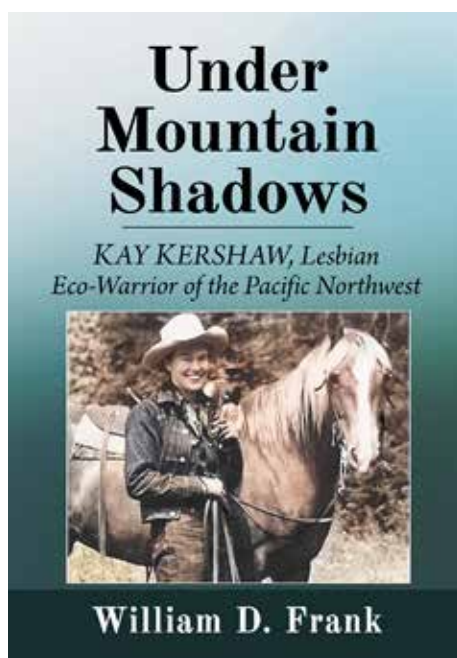
### *Under Mountain Shadows: Kay Kershaw, Lesbian Eco-Warrior of the Pacific Northwest*

By William D. Frank

Reviewed by Dave Fluharty

This modest volume is a tribute to a unique individual, Kay Kershaw (1907-1996). She became a local celebrity in and around Yakima, was known around the state for her exploits as an athlete, early aviator, dude ranch operator and guide, and determined conservation leader whose accomplishments resulted in protection of designated federal Wilderness in what is now Norse Peak Wilderness, William O. Douglas Wilderness (formerly Cougar Lakes Wilderness) and protection of Bumping Lake east of Mount Rainier National Park. These efforts were joined by North Cascades Conservation Council (N3C) in the late 1970s and early 1980s and the campaigns produced major successes. In fact, when researching this book, author William D. Frank contacted N3C for correspondence and other involvement between Kershaw and N3C's then President, Patrick D. Goldsworthy. N3C Advisory Council member Brock Evans is quoted in his blurb for the book that it is, "A most fascinating deeply engaging exploration of homosexuality/lesbianism—not to mention far deeper understandings and tales about Yakima/East-side sociology/politics that I've ever seen before."

While the struggle for protection of Wilderness east of Mount Rainier National Park was the primary way N3C connected with the remarkable Kay Kershaw, author Frank's book opens the curtains to the Yakima Valley context of the early 20th Century and how unusual it was for Kershaw to grow up in Yakima County and become recognized and treasured within that conservative environment. While growing up Kershaw simply did things that women were not expected to do (or to be good at) in a region that significantly embraced the Ku Klux Klan



in the 1920s and was heavily dominated by white males and a culture that supported women as homemakers. Kay Kershaw just broke the mold and did things her way.

Kay Kershaw's way was not taken by other young women in her region. Kay was no stranger to all of the skills necessary to live on and contribute to ranch life including rodeo riding and horse travel throughout the early trails of the Cougar Lakes region. Already an outdoors woman she became a mountaineer, pilot and an individual who did not feel dependence on a male partner was essential. Running Double K dude ranch (purchased in 1942) at Goose Prairie in rural Yakima County, Kay and her long-term partner Pat Kane interacted with many, including with their neighbor William O. Douglas whose Goose Prairie property was nearby and who shared their interests

in cross-country skiing, horseback camping and conservation. Pat Kane and Kay Kershaw's relationship ended in the mid-1950s and Isabelle Lynn entered the picture. Kay's ambitions for Wilderness protection for Cougar Lakes resonated with Justice Douglas and together with Isabelle Lynn they formed an irresistible coalition for conservation and more.

A proper proportion of the book is devoted to how the relationship between Justice Douglas, Kay Kershaw and Isabelle Lynn might have influenced some of the remarkable decisions of the Supreme Court recognizing the rights and responsibilities of gay/lesbian individuals under the U.S. Constitution. Apparently, the association was also good for the success of the Double K Ranch as well.

*Under Mountain Shadows* is an important book from many perspectives. It is a social commentary on the early (mostly hidden or not discussed) history of what we now term LGBTQIA+ (lesbian, gay, bisexual, transgender, queer, intersexual, asexual and more) individuals and communities. It is also a documented history of Wilderness protection for the Central Cascades that N3C supported in our early days. For this alone, this book is invaluable to refresh our memories about the fight for Wilderness. Also of high interest are the insights into the internal working of the Supreme Court over these issues today and the groundwork precedents that it created. I found it a good read for all of the above reasons and recommend it highly.



# Monte Cristo: Zombie roads never die

By Bill Lider



*First log bridge construction, September 2013. —LIDER ENGINEERING PHOTO*

According to a June 3 email from Joe Gibbens, Mount Baker Snoqualmie National Forest (MBSNF) is planning to re-open and repair the CERCLA Road to the first bridge into Monte Cristo. The CERCLA Road is no longer needed as the CERCLA cleanup and monitoring are now complete. Yet the USFS is still pushing to spend the public's money to keep the CERCLA Road open, even though its use is no longer needed.

The Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), often referred as the Superfund Act, was used for the justification to construct this road. Over one hundred years after the mining operations ceased at Monte Cristo, the USFS used the Superfund Act for its justification to construct a temporary road to clean up the mine tailings contaminates leaching out of the abandoned mines. This decision was largely driven by windfall settlement from ASARCO's (American Smelting and Refining Company) closure of its Tacoma smelter with the Department of Ecology. The USFS had a share of this settlement money burning a hole

in its pocket and a lust to construct a new road.

The CERCLA Road passes through an Inventoried Roadless Area (IRA) and a designated Marbled Murrelet nesting area. The CERCLA Road was approved by then former, and now current Secretary of Agriculture Vilsack's 2009 authorization to construct the road under an exemption in the roadless rule for only the CERCLA cleanup, that everyone now agrees is complete. Any work to continue maintaining the CERCLA Road that is not related to the cleanup far exceeds what Vilsack authorized back in 2009 and should require a new authorization.

Legally, the CERCLA Road cannot be used for any other purpose than the CERCLA Cleanup that is now complete. Continued maintenance of the road requires a new NEPA environmental determination that the USFS now appears set to ignore.

In 2012, the USFS committed to the Sierra Club in a November 1, 2012 letter from Forest Supervisor Eberlin that this would be a temporary road. Under threat of lawsuit to the CERCLA

Road construction, the USFS changed the bridges and culverts from permanent concrete and steel structures to temporary log bridges with an estimated life span of 15 years. The log bridges are now 11 years old and at the end of their life span.

Continued maintenance of the CERCLA Road will only boost efforts to turn it into a permanent road. The Monte Cristo property in-holders continue to lobby to have the road re-opened, but just for their private use, which would constitute a gift of public money. Permanently opening the CERCLA Road to the public will bring devastation to Glacier Basin and Silver Lake from overuse and violate federal laws protecting IRA's.

Maintaining the CERCLA Road will only encourage 4-wheel drivers to rip the gate down and open the road for their private use.

About a quarter mile in from the Mountain Loop Highway, there is a clearing on the CERCLA Road that the USFS used for staging construction equipment and a helicopter pad. Vehicle and human use of this site is disruptive to mountain goats that come down from Sheep Mountain to graze. Given that the USF&WS lost 99% of the mountain goats it tried to import from Olympic National Park, this area is very sensitive to human disturbance to both goats and murrelets.

N3C contends that if the USFS or Ecology have any money left over from the ASARCO clean up funds, that it be used to construct a suspension foot bridge across the South Fork of the Sauk River at the old Twin Bridges location, about a mile in from Barlow Pass. This would allow safe access for hikers, mountain bikers, and backpackers into the Monte Cristo area, while protecting threatened marbled murrelet habitat.

The CERCLA Road should be left alone to return to nature as the USFS promised back in 2012.

# Letter to the Editor, Methow Valley News, regarding Forest Service projects in the Methow Valley

June 19, 2024

To the Methow Valley News

Dear Editor:

I grew up at Poorman Creek and was raised in the Methow Valley. I hold college degrees in Environmental Studies and Outdoor Recreation. I'm currently an engine boss on a local wildland fire fighting crew and a professional outdoor action sports athlete. Like you, the people in my community at Second-Mile Ranch live here because of the peace, and connection to our natural surroundings.

With the infusion of federal funds to our local national forest, we have an excellent opportunity to protect our homes from fire and shape the health of our forests for generations to come. We can be a leader in ecology-based forestry.

We are disturbed to find four huge Forest Service timbering projects: the 50,000 acre Mission Project is now being logged. The pending Twisp and Midnight Projects would log and burn another 77,000 acres and remove over 100 million board feet of timber in the Twisp River Corridor. Next in line will be the 60,000-acre Upper Methow Project in the Goat Creek Drainage near Mazama.

We can do better than these old-school industrial logging projects. We can protect ourselves from fire with responsible forest thinning without massive commercial timber sales. What the forest and the people who love it need is innovative, holistic, solutions that respect our fish and wildlife habitat, recreation quality, and the forest ecosystem.

What we've found in the ongoing Mission Project in Libby and Butter-milk Creeks has undermined our faith that the agency can carry out a thoughtful, science-based approach. Third party monitoring found that far more, and larger trees were cut than was prescribed. The near clearcuts, stumps, logging slash and eroded



Michael Bird Shaffer. —JASON HUMMEL PHOTO

ground leave an eyesore and could actually increase wildfire potential.

These plans will not leave us with a thriving, diverse forest, but a machine logged landscape with fractured habitats. They are awkward experiments that attempt to change the entire forest ecosystem when what we should be doing is focusing on thinning in areas close to homes and communities.

Weigh the logging of hundreds of millions of board feet of timber—to be sent to faraway sawmills—and who benefits? Our economy depends on excellent outdoor recreation. Local residents and visitors want high-quality, sustainable recreation, not a degraded landscape. What a high price to pay for supposed protection from wildfire, protection that is not even assured.

We at the Second Mile Ranch community worked in good faith with the Forest Service. We attended tours, sat in public meetings, submitted comments and made suggestions, finally being forced to object, but our concerns were ignored. We have deep respect for Forest Service employees who are our friends and neighbors, but the upper management is charging

forward with a hastily-devised logging agenda, ignoring community-based solutions.

The draconian phrase we too often hear is, "it's not if [we have a wildfire] but when." The fear of fire should not rush us toward irreversible decisions. The Forest Service is returning us to the same industrial logging strategy—removing large trees—that caused the decline of forest health in the first place.

Presently, the Forest Service leadership is offering only one plan of action in these projects. The public is given the choice of agreeing with their plan, or doing nothing. There is no consideration for surgical, light-handed projects, only use of a single blunt instrument. We fear these logging projects more than the possibility of an unnaturally large wildfire.

Methow citizens should insist on progressive, present-day solutions that involve the community and respect our ecosystem's native structure. The Methow should not be relegated to a

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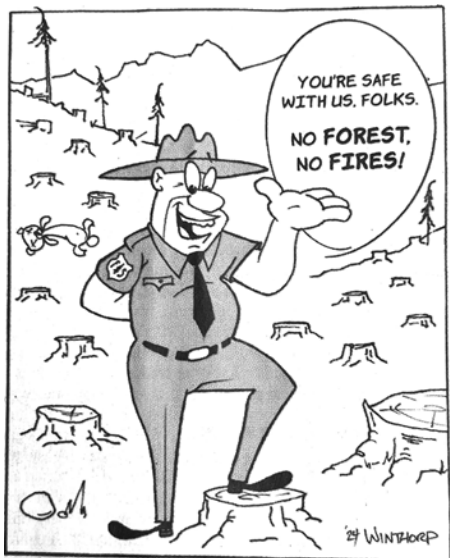


test plot based on a flawed hypothesis that was farmed out to subcontractors who have no ties to our community or our natural landscape.

We would like to see true thinning of crowded, small-diameter trees, with manageable hand piling and prescribed broadcast burning. The contractor should not be paid with trees, but with available federal funds. We support inclusive, community-based solutions, not top-down dictation of policy.

I would like to share a film we co-produced, "Our Backyard: For the Love of Our Methow Valley" (see page 4). It helps bring about visual awareness of these planned timber sales. Please consider getting involved in efforts to protect ourselves from wildfire without dismantling our forests.

Sincerely,  
Michael Bird Shaffer  
Twisp WA 98856



## Twisp timber sale lawsuit goes to the Ninth Circuit Court of Appeals

By Ric Bailey



*"Thinning" near Buttermilk Cr. If the Twisp "Restoration" Project proceeds it will do similar damage on a larger scale. —PHIL FENNER PHOTO*

After a disappointing decision from the US District Court, N3C has appealed its approval of the 24,000-acre Twisp Restoration Project to the Ninth Circuit Court of Appeals. Our brief was submitted to the Court in early June. If we win, it is almost certain this 24,000-acre logging project will be withdrawn.

While we wait for the Court's decision, we'll be fighting a new Forest Service proposal to log another 53,000 acres of the Twisp River Watershed called the "Midnight Restoration Project." We submitted extensive comments on the Draft Environmental Impact Statement for Midnight last month.

The Midnight Project would remove at least 69 million board feet of sawlogs from the Upper Twisp River Corridor, a popular recreation use corridor with seven campgrounds and nine trailheads. It would allow logging in roadless areas, and Late Successional Reserves under the Northwest Forest Plan that are presumed protected for

the northern spotted owl and other endangered species.

The Forest Service insists these logging projects are justified because of a presumed imminent wildfire that will jeopardize old growth forests and local communities. N3C insists these projects will seriously damage the ecosystem, and that the risks proposed by the logging outweigh the risk that a wildfire might occur, that it might be an unusually intense and expansive fire, and that modern firefighting efforts will not extinguish it.

The Ninth Circuit Court Decision on Twisp, and the final decision on Midnight are expected this fall. We encourage all N3C members to express your opposition to these logging projects to the Methow Valley District Ranger at [christopher.furr@usda.gov](mailto:christopher.furr@usda.gov).

# 2024 Helicopter-supported Wilderness projects

North Cascades National Park Service Complex News Release

## **Sedro-Woolley, June 13, 2024—**

Several projects with helicopter support will begin this season in the Stephen Mather Wilderness as snow levels recede. Time and distance of flights over and around wilderness will be minimized whenever possible. Flight dates are subject to change depending on weather and other safety factors.



## **Mid-June: Radio Repeater Maintenance (June 17-21)**

Helicopter flights will support radio maintenance and replacement of outdated equipment will occur to keep the park radio communications system operational. Numerous flights to the Hozomeen and Stehekin areas, and Ruby, Copper, Lookout, and McGregor repeater sites are possible. Flights will be combined with other projects when possible, to reduce flight numbers.

## **Late-June: Historic Structure Maintenance (tentative dates June 21-25)**

Helicopter flights will support historic structure maintenance in the Thunder Creek drainage south of Junction Stock Camp. A long-line transport of materials is expected over one-two flights.

## **June and July: Bear Creek Fire Rehabilitation**

Located in the northern section of North Cascades National Park on the Chilliwack River, the Bear Creek Camp area has been closed due to fire since July 30, 2021, and sections of the Copper Ridge and Brush Creek Trails will remain closed this year. This rehabilitation project will clear downed trees, repair trail treads, reestablish the collapsed trail, restore and improve drainage features, and build small, slope retaining features from onsite materials as needed. Two helicopter

flights will be used to transport crew and materials to Indian Creek Camp as early as possible, sometime during June or early July, weather dependent. Use of the helicopter will facilitate safe access to the area allowing trail crew time to clear trail, repair tread, and accomplish annual maintenance. The work is expected to last 14-18 weeks in 2024 and possibly continue for several seasons. The area will reopen after completed repairs.

## **August: Human Waste Removal (tentative in August, may be later in the summer)**

Flights to remove barrels of human waste from Cascade Pass, Sahale Glacier Camp, and Sulphide Glacier may occur late summer 2024. Composting toilets are critical for protecting water quality and visitor safety throughout the park, and helicopter flights are the best method for removing the human waste from these locations when needed.

## **September: Mountain Lake Water Quality Monitoring (tentative dates September 3-5)**

Six mountain lakes in North Cascades National Park Service Complex have been monitored annually through the North Coast and Cascades Network long-term ecological monitoring program since 2012. This program pro-

vides a robust and unique data set from mountain lake environments. Flights to transport researchers and haul equipment to two of these lakes, Easy Ridge and Lower Silent lakes, are required due to the technical nature of approaching them by foot. Three flights are required for this project; one for ingress into the primary lake, one to transfer crew and gear to a second lake, and the final flight for egress.

## **September: Long-term Glacier Monitoring**

Since 1993, the National Park Service has been monitoring the mass balance of four glaciers in North Cascades National Park: Noisy, North Klawatti, Silver, and Sandalee. Field measurements of winter snow accumulation and summer melt occur twice annually in early spring and fall. From these measurements, annual changes in volume can be calculated providing insight into the glaciers' health and their contribution to regional streamflow. Helicopters support transportation of scientists and monitoring equipment to these remote sites. Spring flights occurred over a two-day period between late April and early May and a one-day fall flight will be required in late September.

**Ongoing:** Helicopter flights by Seattle City Light may occur throughout the summer and fall in Ross Lake National Recreation Area. Although flights will not likely occur in wilderness, helicopter noise may be heard on and around Ross Lake.



# Is the National Park Service serious about Wilderness?

By Mark Peterson

President, Board of Directors, Wilderness Watch

*Reprinted with permission from Wilderness Watch*



Mariposa lily, Poorman Cr. watershed, Okanogan-Wenatchee National Forest. —PHIL FENNER PHOTO

*The Park Service has done relatively little to demonstrate that it has taken its wilderness management responsibilities seriously nor has it implemented a management program which reasonably provides for the day-to-day and long-term preservation of this resource. The lack of evidence that the Service has met even its most basic responsibilities as required by the Wilderness Act, and its own policies...has generated a growing distrust of the agency by the public...This distrust is exacerbated by the growing number of incidents throughout the Service wherein NPS staff violate the letter and*

*spirit of the Wilderness Act...with little or no consequences.*

—Jim Walters, former NPS  
Intermountain Region Wilderness  
Coordinator

When one thinks of wild landscapes in the U.S., national park areas come quickly to mind. Yet, as we celebrate 60 years of the Wilderness Act this year, wild places in too many of even our most iconic parks have been left behind and left vulnerable. Deserving areas suitable for wilderness designation in parks from Acadia to Yellowstone and 13 areas in Alaska have not been protected under the Wilderness Act. While only Congress can designate Wilderness, the law requires the National Park Service (NPS) to iden-

tify lands that qualify for wilderness designation and make recommendations to the President, and ultimately to Congress, as to which lands should be designated Wilderness. NPS policies require recommended wilderness to be administered as Wilderness, though the NPS often doesn't abide by the policy. As one former NPS wilderness specialist wrote, "...NPS' wilderness program remains erratic, poorly defined, and vaguely implemented in most parks within the system."

Recent examples reveal there is no guarantee that Wilderness and potential wilderness areas in our national parks will be managed according to the letter and spirit of the law. National Park Service administration has

CONTINUED ON PAGE 16

## NPS v Wilderness

CONTINUED FROM PAGE 15

strayed far from the Wilderness Act, a particularly discouraging fact given it oversees so many of our nation's wild-est crown jewels.

Consider these NPS actions in national park Wildernesses:

- Olympic—replacing old trail-side shelters with new structures helicoptered in;
- Point Reyes—fencing native Tule elk out of much of the area to appease ranchers that graze cattle there, then hauling water troughs and water to keep the elk herd alive;
- Cumberland Island—transporting visitors via passenger vans on primitive routes through Wilderness
- Everglades—over 3,000 helicopter landings in Wilderness in one year for fire management and research projects with inadequate analysis of non-mechanized, wilderness-compatible alternatives
- Sequoia-Kings Canyon—more than 20,000 acres of Wilderness landscaping (logging, burning, and planting) to create managers' desired conditions in giant sequoia groves, rather than allowing nature to determine the conditions there;
- Glacier Bay—a draft plan that would designate a less protective shoreline zone permitting a radio tower and up to 10 repeater towers and research installations; and
- Gulf Islands—allowing misuse of personal watercraft and motorboats within Wilderness.

The NPS administers more Wilderness than any other federal land management agency, including 53 park areas designed as Wilderness and at least 31 additional areas identified as “recommended,” “proposed,” “potential,” and “eligible” as Wilderness. And this number likely underestimates qualifying lands since the NPS has



*Female sooty grouse in Horseshoe Basin, Paysatan Wilderness. —PHIL FENNER PHOTO*

not conducted assessments to identify potential wilderness designations in every park with wild lands, despite the law requiring it do so.

Since the passage of the Wilderness Act in 1964, three NPS task forces have documented the problems of NPS wilderness management. And in 2002, a committee of knowledgeable individuals from the academic and environmental community provided additional perspective and recommendations on the NPS wilderness program. Yet, while there has been some progress, the agency has ignored or only superficially adopted most of the recommendations, to the great detriment of its wilderness lands.

One key factor contributing to the poor state of wilderness management is the program's continued and intentional invisibility throughout the NPS. Although roughly 86% of all NPS lands are designated, recommended, or potential wilderness, wilderness management in the national office consists of only one policy position. Throughout the agency, the wilderness program is generally buried and largely ignored.

“The lack of accountability and oversight regarding Wilderness is a huge problem for the agency,” says Bob Krumenaker, former Superintendent of the Apostle Islands National Lake-

shore, who orchestrated the designation of 80% of the park as the Gaylord Nelson Wilderness. “Superintendents are allowed wide discretion on how their park is managed. Decentralization provides for useful nimbleness and flexibility, but it...allows wilderness protection to be compromised. Evaluating superintendents' wilderness performance should be part of their annual evaluation.”

Examples of the NPS wilderness accountability problem are not hard to find. In 1999, park staff discovered that Devils Postpile National Monument had been designated Wilderness in 1984. Apparently, for 15 years park staff were unaware of that status and the park was managed without a wilderness plan or consideration. Likewise, in 2003, Sequoia-Kings Canyon issued rules that would allow the routine use of helicopters and other motorized equipment prohibited within Wilderness, with no public involvement and no wilderness management plan to guide decisions.

In 2004, NPS' Intermountain Region Wilderness Coordinator, Jim Walters, wrote to his boss, NPS director Fran Mainella, “...the NPS has a poor record for completing wilderness management plans even though this has been a policy requirement for nearly two



decades...less than 20% [of parks with designated Wilderness] currently have a wilderness management plan. Of these, approximately half are badly outdated and do not meet the basic requirements for a wilderness plan...."

"The Park Service needs to do a much better job of wildland planning," Krumenaker says. "We need to develop a simple emplate to make basic wilderness planning easier—clear legal boundaries, managing visitors, protocols for scientific research and monitoring, identifying unacceptable activities, and strategies for preservation."

Basic park-specific guidelines are essential to ensure that parks with wilderness resources aren't compromised, and that its wilderness stewardship program is not subject to the whims of individual superintendents who come and go."

On the eve of the 60th anniversary of the Wilderness Act, the words of Richard Sellers, NPS Historian and Wilderness Steering Committee member in the early 2000s, capture today's challenge and opportunity before his agency:

"...the Park Service's wilderness management puts to the test NPS's belief in itself as a preservation agency. This belief is in everyone's heart, but is still not reflected in everyone's action. As we know, Wilderness is statutorily different from typical backcountry, and the law requires very special treatment of Wilderness. National Park Service compliance with the law should recognize the tremendous significance of Wilderness as outstanding examples of America's most pristine landscapes—areas of great ecological, spiritual, and recreational value."

"Let the Park Service now live up to its belief in its preservation mission, and match the nobility of national park Wilderness—and of the Wilderness Act itself—with a strong and decisive wilderness management program that is institutionalized throughout the National Park System."

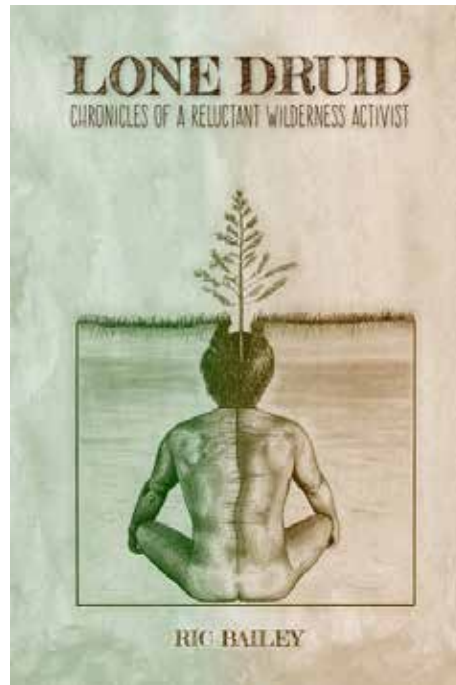
## BOOK ANNOUNCEMENT

### *Lone Druid*

### *Chronicles of a Reluctant Wilderness Activist*

By Ric Bailey

*N3C board member Ric Bailey is a lifelong wilderness lover and activist. His book chronicles his adventures as an outspoken voice for wilderness in a logging and ranching community not sympathetic to his views. He's presently working on stopping the logging projects planned in the Methow Watershed.*



to nature. This memoir describes his many raw adventures as an activist, an outspoken campaigner who is both loved and hated. He's been hanged in effigy and boycotted in the rural community he called home, threatened with death, and accused of being everything from a misanthrope to an anarchist. Yet Ric has a blue collar work history, including falling timber and driving semi-trucks.

*From the backcover of Lone Druid:*

Ric Bailey is a chronic nature lover. He's no scientist or ecologist, in fact, he doesn't even have a college degree. He uses passion and conviction to achieve his land protection successes. He doesn't know the names of very many flowers, bugs, or birds, but relishes sharing time with them. And, he's dedicated his life to protecting all life beyond humanity. But as a human himself, he recognizes that we bipedal Earth dwellers are inextricably bound

He obliterates a lot of stereotypes. Ric once chained himself to an active bulldozer to prevent the logging of an untouched forest. He's gone to extreme lengths to rescue the special places he and scores of others love. As a self-taught writer, Ric presents this book with the same emotional zeal with which he's defended wilderness. It is entertaining, educational, and profoundly original.

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# Nightmare on the North Fork?

North Fork Stillaguamish Landscape Analysis Project #61659

Darrington Ranger District, Mt. Baker-Snoqualmie National Forest (MBSNF)

By former MBSNF scientists Brady Green, Roger Nichols, Jim Doyle, and Barry Gall



*A preview of what the N. Fk. Stillaguamish is in for: this is the S. Fk. Stillaguamish Project now underway. —KATHY JOHNSON PHOTO*

Significant concerns about this timber sale have been expressed by five MBSNF retired aquatic ecosystem personnel having a collective 85 years of experience in the Deer Creek and NF Stillaguamish watersheds.

Watershed conditions in the project area are very challenging. The glacial geology (deep glacial lake deposits, till and outwash soils), created steep topography and extensive areas of naturally unstable soils. Management activities (logging, road building, and a lack of road maintenance) have resulted in numerous landslides and impacts to streams. Climate change effects are only expected to exacerbate the situation.

The project thins 352 forest stands (~17,363 acres) over 15 years in these watersheds. Only 44 (12 %) stands of the timber have been surveyed to know if they are viable, making the determination of a viable sale highly uncertain.

Commercial treatments proposed on 3,005 acres, along 152 miles of streams and riparian reserves, with non-commercial thinning along 236 miles of stream channels. New soil disturbance would occur on 128 miles of existing National Forest System roads and 63 miles of new road construction.

Project analysis does not adequately discuss or address the many landslides

that have occurred in these watersheds, nor the long history of rain-on-snow-triggered landslides and erosion. Thorough analysis is warranted since the project is located upstream from the infamous March 22, 2014, Oso Landslide, which resulted in significant loss of life and property.

Disturbances to unstable soils will adversely affect designated critical habitat for five federally listed threatened fish stocks (NF Stillaguamish Summer and Fall-run Chinook Salmon, Stillaguamish Winter-run Steelhead, Deer Creek Summer-run Steelhead and Stillaguamish River Bull Trout) under the Endangered Species Act.



The project is located within four key watersheds, designated in the Northwest Forest Plan, where stream temperature and sedimentation issues will further compromise water quality (temperature and low flow conditions) in the Deer Creek, Little Deer Creek, Higgins Creek, and North Fork Stillaguamish River watersheds. These watersheds are listed as “impaired” for temperature, under section 303 (d) of the Clean Water Act. The project would violate many Washington State Administrative Codes.

MBSNF personnel who developed this project have less than 15 years of combined field and ground experience with the aquatic ecosystem resources in these watersheds. Sources for most of the data and information in the planning documents are on-the-shelf literature and GIS information. Little up-to-date field data and information exist in these documents. Long-term, detailed knowledge and experience regarding the sensitivity, and natural instability, of these watersheds, is not

understood by current MBSNF personnel, nor by members of the Darrington Collaborative.

A major change in agency management of natural resources in PNW National Forests has taken place over the last 20-25 years: current personnel lack knowledge and understanding of changing ecosystem conditions due to past natural and management-caused events, not just current ones. Knowledge and understanding come from review of the literature from the past, as well as data and information, from on-the-ground observations, surveys, and inventories. Apparently, current national forest level personnel do not do much of either of these.

The MBSNF should reduce the size and scope of this project to avoid all unstable slope and actually improve conditions. The focus should be on maintaining and restoring existing roads in the area and only thinning forest stands that are accessible from existing roads.

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*Looking west into the heart of the Glacier Peak Wilderness from Freezer Pass. —Jim Scarborough photo*