



BLM National NEPA Register

Comment Submission

Project: DOI-BLM-ORWA-M040-2023-0002-RMP-EIS - Cascade-Siskiyou National Monument Resource Management Plan

Document:

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Comment

July 3, 2024

Dear Bureau of Land Management:

Thank you for the opportunity to comment on the draft management plan and draft environmental impact statement for Cascade-Siskiyou National Monument.

President Biden's Executive Order 14702 calls for broad protections of ecosystems of 30 percent by 2030 and 50 percent by 2050. This requires minimal impact on older forests and old growth and rangelands. Our natural forestlands are the best at taking up and storing carbon in intact forests and the largest trees. We must apply these concepts to current Monument Lands like the Cascade-Siskiyou.

Of the alternatives, D is the best, but is not good enough. Please prepare a true conservation alternative for the management plan that adheres to the Proclamations establishing and expanding the Monument by genuinely protecting its biodiversity, old-growth forests, carbon sequestration, and other unique features found at this ecological crossroads. Alternative D allows commercial logging, fire gap logging and salvage logging that will harm the ecosystem this Monument is trying to protect in fundamental ways.

The new alternative should prohibit salvage logging. On average, wildland fires kill 5-15 percent of the trees, and it is not immediately certain which trees will die hence live trees are cut. The remaining trees are needed for natural re-seeding, preserving the ecosystem and wildlife habitat. In addition, soil compaction due to salvage logging reduces the chances for natural reseedling and progression of early growth that stabilizes the soil. Soil in forests holds 45% or more of the carbon.

Fire will create breaks in the forest or "gaps" so that logging to create these breaks is not necessary, manmade gaps are likely to increase the risk of fire hazards. All commercial logging of this sensitive area should be restricted. Thinning and fuel reduction may be important near communities, but overall logging must be banned. Absolutely no logging should occur in the Wilderness itself. The BLM should instead focus fire risk reduction efforts next to structures and focus on surface and ladder fuels, not the forest canopy.

Another improvement for Alternative D will ensure protection of Monument objects by continuing to apply components of the Northwest Forest Plan, including the Aquatic Conservation Strategy and Survey and Manage protocol.

Finally, the BLM can improve Alternative D by recognizing and fully protecting Areas of Environmental Concern, Research Natural Areas, and Lands with Wilderness Characteristics, including those that are not adjacent to the existing Soda Mountain Wilderness, such as the proposed Grizzly Peak and Green Springs Mountain wild areas. These need to maintain their wilderness character.

Thank you,

Catherine Thomasson, MD

On behalf of MCAT - Mobilizing Climate Action Together

