



February 1, 2024

To: USDA Forest Service, National Office

From: Communities for Healthy Forests, Inc.

Re: Comments to Northwest Forest Plan Amendment #64745

Communities for Healthy Forests, Inc. (CHF) is pleased to be able to offer our comments to the Northwest Forest Plan Amendment, currently in the scoping process. We do so because we have always treasured our forests and communities and understand that the NWFP has been an abject failure, having failed all principals of economic, social, and ecological services promised by then President Clinton. Our team has participated in several of the webinars offered to better understand the process and substantive data on the condition of our region's forests. We welcome the opportunity to provide comment to the NWFP revision utilizing our 20 plus years of knowledge gained through science and ecological learning in these federal forests.

CHF is a 501c3 nonprofit educational organization based in SW Oregon. In 2003, less than ten years after adoption of the Northwest Forest Plan, a diverse group of community leaders, already concerned with the declining trend of our local national forests, organized CHF to educate and inform the public about the health of federal forests, our historically catastrophic wildfires, and the lack of any substantive post-fire restoration efforts. We witnessed the conditions of Southwest Oregon's federal forests but well understood that the issue was not local but rather a national issue, the result of a myriad of post NWFP adoption interpretations, adoption of restrictive rules and policies, expanded no-harvest set asides and failure to incorporate the standard of Adaptive Management, embedded in the Northwest Forest Plan.

### ***Fire Resistance & Climate Resilience***

The current condition of these federal forests offers no resistance to fire. The forests are largely a homogenous, for the most part uninterrupted canopy structure. Interruption of that structure occurs where repetitive fires have reduced the former canopy to brush fields, often within entire drainages. The hundreds of millions of dollars invested in the transportation infrastructure has largely been abandoned and even intentionally removed, eliminating access roads that could support emergency wildfire response.

When fire does occur, resulting in a stand replacement event, little to no salvage that could otherwise reduce fuel loadings and safety hazards for ensuing fires is done. And for three decades we have witnessed these areas burning repeatedly. Here are a few examples:

- Rogue Siskiyou & Medford BLM: 1987 Silver, 2002 Biscuit, 2017 Chetco Bar, 2018 Klondike & Taylor Creek, 2023 Flat Fire
- Umpqua NF: 1996 Spring, 2008 Rattle, 2017 Happy Dog, 2021 Jack
- Umpqua NF: 1987 Apple, 2002 Apple II, 2021 Jack



Areas that were largely intact forest initially experienced mostly mixed severity fire but ensuing fires burned with greater severity and intensity. By the third time these areas have burned thousands of acres are now brush fields with little or no surviving conifers for seed source in hopes of natural coniferous forest recovery.

Timely salvage efforts could supply raw materials for housing, support the local economy and provide funding for local schools and local government. The processed wood, no longer decaying on the ground, would not emit carbon into the atmosphere. Wildfires consuming vegetation are among the greatest contributors of greenhouse gases, not only during active burning but long after. Trees that for centuries sequestered and stored carbon become emitters of that carbon as soon as they die & decay. What may have taken centuries to store is vaporized in decades.

Severe weather events along with insect and disease infestations regularly have impacts on federal forests. We see snow and ice storms lay down swaths of mature timber, at times over bands of thousands of acres. Insects and disease tend to develop in pockets, increasing in size over time. Since the inception of the NWFP in 2004 Forest Service and BLM (O & C lands) seemingly adopted a policy to avoid salvage of the fallen trees in these events. Even roads have remained blocked by the fallen timber which could easily have been sold as commercial timber sales to generate revenue and provide raw material for manufacturing facilities. As the fallen trees decay over time, they elevate fuel loadings for oncoming fires, increase fire intensity, increase ground fire temperature damaging soils all while hampering fire control efforts for years. Fires like the 2023 Tyee Ridge Fire (Douglas County, O & C) affected by the February 2019 Snowmagedon event and as early as the 1996 Spring Fire (Umpqua NF) affected by the 1995 snow event. It is imperative that the NWFP amendment recognize the increased hazards of these weather events and incorporate guidance for timely salvage operations.

Too often managers are eager to use fire to reduce fuels without preparing the landscape to accept benign fire, resulting in escapements that threaten life and property for weeks on end and often miles away from the ignition. That is the case with prescribed fire but even more so with Wildfire Use, where an unplanned ignition occurs, and fire managers “manage” the fire rather than promptly suppressing it. Too often the justification is that “there are minimal values at risk,” Chetco Bar Fire ignition within the Kalmiopsis Wilderness for instance. These managers are literally playing with fire and peoples’ lives—thousands of firefighters called to action as well as citizens near and far who have no option but to breath the harmful smoke for weeks on end. Who in their right mind would think that if allowed to continue to burn an ignition in mid-July will not grow into a conflagration by the time fall rains arrive in October? The amended plan’s Standards and Guides must inform fire managers on the safe application of wildfire use.

Forest conditions resistant to fire require significant areas within drainages be treated with thinning to open canopy structure to reduce threat of crown fire and allow heat from ground fire to be released. Ladder fuels must be eliminated to protect the taller canopy. To be effective significant amounts of trees and fuel on treated acres must be removed followed by judicious use of fire to reduce fine flammable



material and rejuvenate soil and ground conditions. For treatments to be effective they must be done at scales large enough to effectively alter adverse fire behavior, prepare subbasin level landscapes to accept benign fire and truly protect the most valuable features at the subbasin level.

We read much about Firesheds, PODS, Indigenous Practices, and other popular buzz words. But the current level of restrictive guidance from the NWFP, laws, executive orders, policies, and regulations by multiple federal agencies not only hinder application of what we have learned but most often prohibit the application of sound science. The plan amendment must identify and eliminate barriers to creating fire resilience. We must recognize that potential short term impacts on forest conditions, wildlife habitat, air and water quality are far better than the long term impacts of no action.

### ***Mature and Old-Growth Forest Management***

Discussions about the weather and climate over the last decade have been largely focused on the abnormally hot, dry weather, lack of rainfall even in the rainy Northwest and the severe mortality within our ubiquitous Douglas-fir forests. But long before this drought pattern we noted the mortality, especially of the largest, oldest trees, within mature stands. These stands are largely “intact,” not previously harvested and in most cases “protected” with special designations such as LSR, Riparian Reserves, Inventoried Roadless, or Scenic Areas among others. These designations however have failed in their protection. As the data shared by Ray Davis during the webinar shows, these are not protections for older forests but rather their death sentences. Despite the severe harvest reductions on federal (85% to 90% on Forest Service and O & C lands) the first decades under the NWFP resulted in minimal expansion of mature stands. The last 6 years of available records resulted in over a 6% DECLINE in mature forests and over an 8% DECLINE in Northern Spotted Owl habitat. These reserve areas are burning catastrophically.

This management by neglect must be reversed to allow the use of scientific silvicultural management—thinning to reduce the dense canopy to 35%-50% as prescribed by several studies followed by disposal of slash & small fuels. Every acre does not require treatment, nor should it be but enough of each subwatershed (25%-35%) must be treated to be an effective deterrent of catastrophic wildfire. In partnership with industry, commercial timber harvest in the treatment areas would supply raw materials for local economic support and funding for local government rather than putting a drain on taxpayers.

Native, unmanaged stands typically are dense, with multistoried canopies, often dominated by Douglas-fir but also mixed conifer species. In discussions with the SW Oregon regional entomologist, Don Goheen (now retired) he informed us as well as Forest officials, that these stands had a biological density tipping point. The density could be quantified by measuring the basal area of living trees. Higher, more productive ecotypes could sustain more dense stands than the drier site, mixed conifer, or pine ecotypes. When density exceeds ecologically sustainable levels the largest of the individual trees are the most stressed and susceptible to attack by insects. Uncontrolled, these insect attacks spread into infestations affecting entire stands which become the fuel for the uncontrollable wildfires we are experiencing. Any plan amendments must recognize that even older stands must be actively managed to



ensure not only their survival but their health and vigor while supporting local economy, recreation, wildlife, clean water, and clean air.

### ***Community and Economic Considerations***

Perhaps the greatest failure in the 1994 NWFP is in its failure to support our rural forest dependent communities. In 1994 some of these communities were among the most vibrant, thriving examples of award winning schools, prosperous working families with top performing students, gateways to boundless recreational experiences. Well maintained, paved county road systems provided visitors easy access to excellent federal forest road networks to access high elevation lakes, trails, and campgrounds. The presence of sheriff's patrols embedded in these communities provided citizens with a sense of safety and security.

But the near total collapse of commercial timber sales levels to near 10% of previous forest plan targets decimated these communities. These rural communities now rely of private forestlands, if they are near, to provide a fraction of the former jobs. School enrollments have declined severely, in many cases over 50%, resulting in countless, permanent school closures. Unlike our flourishing urban centers, four-day school weeks have become the norm. Timber receipt revenues that counties relied upon were nearly eliminated overnight, to be partly replaced with declining Secure Rural Schools payments. Sheriff patrols, victim support, justice system services were chopped. The condition of county road systems and aging infrastructure have declined. All the while the millions of acres that have not yet burned annually grow enough timber to supply our entire manufacturing capacity, yet less than 10% of that growth is made available for harvest to support the local economy.

The Southwest Region of the US provides an excellent study of what happens when the federal government fails to deliver raw material to support the forest products industry. With the near collapse of the timber sale program on that region's national forests, the local manufacturing, harvesting, silvicultural services, road building and maintenance an infrastructure disappeared 40 years ago. Now after 40 years of growth and forest development, the Forest Service realizes that their vast forestlands need to be managed lest they burn but there is no market for their wood, no expertise in doing the work that is required to restore resilience to the forest. Tens of millions of appropriated funds have been spent every year, trying to attract private sector investment, to bring in manufacturing and expertise. I believe the latest effort, a federally subsidized startup veneer mill operation, with significant federal subsidies and grants, designed to process the logs produced from thinning projects closed in 2022. Yet another failure.

Much of the forested region covered by the NWFP still has viable manufacturing, harvesting, silvicultural, road building and maintenance infrastructure and expertise. It is incumbent upon you, the parties tasked with amending the Northwest Forest Plan and for implementing the new plan to incorporate the repairs we have outlined to ensure the survival and health of our federal forests. Our wildlife, our clean water, the clean air we breathe depend upon it. The prosperity, not mere survival, of our forest dependent communities depends upon your actions. The ability of our schools to teach our



youth and the ability of our county governments to provide services to our citizens with adequate shared timber receipts depend upon your actions.

Thank you in advance for your serious consideration of our comments. We look forward to continued engagement throughout this planning process. I submit these comments to you on behalf of Communities for Healthy Forests.

Respectfully,

A handwritten signature in black ink, appearing to read "JG", is positioned below the word "Respectfully,".

Javier Goirigolzarri, CF, Director of Forest Policy  
Communities for Healthy Forests, Inc.