

Dear Secretary of Agriculture Vilsack,

First, thank you for revisiting Forest Service Management policy and objectives that have long needed updating. While the Biden Executive Order 14072, Strengthening the Nation's Forests, Communities, and Local Economies begins to address some of the critical issues our nation faces, it is just a beginning.

To meet the stated goals of the EO, to conserve mature and old growth forests; to employ climate-smart forestry practices; to invest in forest health and restoration; and support local economic development among other goals, the proposals provisions as stated will need to be strengthened.

To succeed in the proposed provisions as stated please consider the following:

Instead of **conserve**, we need at this juncture to **preserve** our country's remaining forests.

All commercial activity on Federal Forest land must cease and desist immediately. This long-standing practice is outdated and unsustainable. While it may have made sense and been possible in the 1890s, the last 130 years of mismanagement on public lands have rendered our forest system in critical condition. The mindset of the extraction industry is antiquated and unacceptable moving into our tenuous future. We have a very different set of circumstances we live in now, and we must adapt accordingly. Replace the term **timber** with the term **trees**. Timber is dead, trees are alive – even when no longer green or growing, they harbor and support a plethora of life forms.

Wildfires are a valuable resource management tool. We need an immediate halt on all projects that pertain to “urban-interface protection project”, “forest resiliency”, “restoration”, and “forest health.” As an example of how “science” is being used to further the interests of the timber industry I would like you to review the recently partially completed, Willoughby Urban Interface Protection Project on the Umatilla National Forest located in Northeast Oregon. There are myriad problems with this project, the most important being a complete and total, if not intentional, lack of oversight by the Forest Service and an alarming lack of accountability. Until the Forest Service can provide evidence of the efficacy of these projects for their stated purpose, no new projects should commence. Instead, study the projects completed and look to recent megafires, like Paradise (ironically the Camp Fire) in California and the Holiday fire on the McKenzie River in Oregon. Both of these fires had extensive logging and “forest health treatments” done *prior* to the fires. These are just two examples.

Wildlife and Fish Habitat must take priority in all management objectives, not money.

Clean air and clean water are requisite for life on Earth. Any activity that threatens, adversely effects, alters, diminishes, disrupts or in any way damages and does not enhance and preserve watersheds, riparian areas, springs, lakes, rivers and streams and air quality must be prohibited on federal public lands.

Soils and biosphere – the document must contain language that recognizes the value and essential quality of the connectivity of the forest system, that cannot be divided or subdivided for commercial purposes but must instead be honored and preserved for the very thing that sustains our life on this planet. We cannot drink money. We cannot breathe money.

Incorporating indigenous traditional ecological knowledge, including Tribal Nations in collaborations, and Tribal governments in decision making and actions. I think at this juncture the above mentioned do not need a Nanny State dictating their rights or their voice. It is theirs alone. I cannot speak of their views.

Developing, in coordination with the Secretary of Commerce, et al, recommendations for community-led local and regional economic development opportunities, and in outdoor recreation – the timber industry died a painful death in Oregon, and most of the Pacific Northwest in the 1980s and 1990s. Let a dead man lay. This is not a patient we can resuscitate. Resource extraction-based industry will always cycle through long periods of decline based on commodity price fluctuations. The reality of the timber industry in the Pacific Northwest, from public land resources, is that the driver of that economy is never local. Again, I point to the Willoughby Urban-Interface Protection Project, purportedly the vehicle to infuse and revive a local economy, will do nothing of the sort. The Contractor's for the job were largely from other areas, even out of state. They will make money. The local economy remains unchanged. The reality is that some of these small communities will never again thrive from the extraction industry. So, let's not beat a dead horse. Millions of dollars have been thrown at this stepchild to no avail. The recommendation of Rural Development experts to build malls in old mills, and bring tourism is not a one-size-fits-all panacea. Recreation is the latest industry that has serious and severe long lasting side effects that are not compatible nor complimentary to climate sustainability or forest health.

Outdoor recreation, as included in the proposal, on our national forests must also be reconsidered at this critical juncture. President Nixon's 1972 issuance of Executive Order 11644 – Use of Off-Road Vehicles on the Public Lands¹ specifically addressed the problems associated with unregulated motorized recreation use and states that, "Specifically, the executive order requires that areas and trails designated for ORV use be located to minimize: damage to soil, watershed, vegetation, and other public lands resources; harassment of wildlife and significant disruption of wildlife habitat; and conflicts between ORV use and other existing or proposed recreational uses."² President Carter's Executive Order 11989 in 1977 allows agencies such as fire, rescue, and agency administrative uses of off-road vehicles on public lands; for national defense purposes and Special Protection of the Public Lands.³ Together these Executive Orders

¹ www.archives.gov/federal-register/codification/executive-order/11644.html

² https://www.fs.usda.gov/Internet/FSE_DOCUMENTS/fseprd528902.pdf

³ www.presidency.ucsb.edu/documents/executive-order-11989-off-road-vehicles-public-lands

in conjunction with the countless Acts Congress passed provide ample tools for the Forest Service to manage and regulate motorized recreation.

In 1974 Congress passed more Acts to assist in managing motorized recreation. The 1974 Forest and Rangeland Renewable Resources Planning Act⁴ requires that the Forest Service create plans to, “develop, maintain, and revise as appropriate, land and resource management plans,” including the inventory of all wheel tracks and add them to the Forest Service Development Road System. Finally, in 2005 came the even more specific Travel Management Plan requirement that each Forest revise its motorized routes and uses, as well as provide a comprehensive roads and trails inventory and maps every ten years.⁵ Congress and the Executive Branch have long provided the tools necessary to address motorized recreation and yet the Forest Service is still not in compliance. As a result of this flagrant abuse, the use of motorized recreation on forest lands must end. There is abundant science demonstrating the multiple adverse impacts to wildlife, habitat, streams and redds, air quality, carbon emissions, and the very fact that the forest service has demonstrated for decades now it’s inability to regulate or enforce.

While I welcome the attention this Executive Order brings to longstanding negligence and abuse from the reckless and wanton mismanagement of the Forest Service of our Nation’s very special and unique gift of vast reaches of forested ecosystems that sustain our life on this planet, as seen with the other executive orders mentioned above, they don’t go far enough. Rulemaking with strong language, specific to each point, and teeth – it’s time for enforcement and consequences, is required for successfully sustaining our national forests going forward.

We are out of time. We don’t have another 3 years, or 30 years, or 130 years to get this right. Time is of the essence. For our future, for the future of our Nation, for the future of the planet it is time to end all commercial activity, end motorized recreation, begin preservation and to protect this national treasure for our very existence. If not now, when?

Finally, although beyond the scope of this proposal, I would like to shed light on another reality. Far be it for me to advocate for more government. However, the rape and pillage by timber investment companies, of Oregon’s private lands, rendering coastal communities without drinking water, must end. It is also time to extend NEPA to private lands. Without which, well...

I leave you with the final stanza of W. H. Auden’s, *Funeral Blues*

The stars are not wanted now; put out every one;
Pack up the moon and dismantle the sun;
Pour away the ocean and sweep up the wood;
For nothing now can ever come to any good.

⁴ Joe Kolman, Environmental Analyst, Environmental Quality Council

⁵ <https://www.fs.usda.gov/science-technology/travel-management>