

Regional Forester, Region 6, U.S. Forest Service
Northwest Forest Plan Amendment #64745

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I am writing to provide public comment on the Northwest Forest Plan Amendment.

You list five interrelated topic areas to change focus.

Fire Resistance and Resilience: Decades of mismanagement by the forest service coupled with climate change have resulted in some forest areas that may appear unhealthy. However, approaching new management practices needs cautionary measures to prevent further exacerbation of the damage – not just to the trees but to the forest system as a whole. That’s the first bit of language that needs to be included going forward, that the Forest Service will consider the forest system as a whole, for its connectivity and inter-relatedness. Therefore, the Environmental Impact Statement the Forest Service prepares for this document must fully consider alternatives which significantly strengthen mature and old-growth forests.

All projects designed to provide fire resistance and resilience must be done without any commercial activity. All commercial activity on forest lands is contrary to sustainability. All commercial activity on forest lands fails to meet minimum standards for the protection and preservation of the forest ecosystem.

Climate Change: Thinning and other “treatments” dry out the forest. More research needs to be done on existing projects that have been completed in the last ten years, to determine their effect on the forest ecosystem. 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.

Mature and old growth ecosystems: Incorporate strong monitoring and accountability measures for tracking the abundance and distribution of mature and old growth forests. 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. Mature and old growth forests are the keepers of clean air, clean water, and all the diversity intertwined.

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.

Communities: 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

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

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

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 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.

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.

In closing, include strong language to protect and preserve mature and old growth forests; eliminate all commercial activity; end motorized recreation; re-vision rural economies for what they can actually do and sustain beyond the resource extraction business, motorized recreation and tourism; include monitoring, accountability, enforcement, and consequences; redefine forests as national preserves to withstand climate change; protect these areas for national security; and protect the biodiversity and connectivity these forest lands provide to sustain our life on this planet.

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

⁴ Joe Kolman, Environmental Analyst, Environmental Quality Council

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