

United States Forest Service
Attn: Deciding Officer, Randy Moore; Chief, US Forest Service

Via Comment Portal: <https://cara.fs2c.usda.gov/Public//CommentInput?Project=64745>
Postal mailed to: R-6- Pacific Northwest Region All Units; 333 SW 1st Ave. Portland, OR; P.O. Box 3623, Portland, OR. 97208

February 26, 2025

**Comments of Richard K. Bailey on the Draft Environmental Impact Statement (DEIS)
For Revision of the Northwest Forest Plan (NWFP)**

Greetings! to whomever is reading this comment letter on the NWFP DEIS. I'm grateful for your astute attention. I addressed these comments to Chief Moore, as I could find no listing of who the deciding/responsible officer is, though I doubt he'll be reading comment letters personally. Also, I also couldn't make sense of the DEIS, but more elaboration on that later.

I'm a lifelong resident of the Pacific Northwest and have a particularly profound stake in the forests here—economically, philosophically, and emotionally. I've hiked and camped in virtually every national forest covered by the NWFP, and have used those forests for mushroom collection, and firewood cutting.

Don't take it personal when you find this letter critical of the Forest Service. I realize you're doing your best as an agency employee. I used to be a Forest Service employee as well—three years on an initial attack (helitack) firefighting crew. I've met lots of good, honest Forest Service employees. Everyone I knew/know has got a solid backbone and two cheeks.

As for the focus of my comments, this is a deeply personal, even spiritual issue for me. But there is one issue in particular—the introduction to the DEIS states in part that the amendment is designed to: "...update (Northwest Forest) Plan components to improve wildfire resistance and resilience." My comments focus on that aspect of the plan.

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I. Interstellar EIS Authors

This chapter title refers to a need for a broader perspective. The following brief observation of US Forest Service history and culture are pertinent to comments on the NWFP DEIS because the Plan is being written by the Forest Service. The content of the Plan will be influenced by the overall agenda and culture of the agency. Biases and obstacles to objectivity, not to mention respect for law, are pertinent.

The *Columbia Insight* story “The Forest Service is using the threat of wildfires to meet timber targets,” on February 6, 2025, revealed the Forest Service’s timber production bias. The article explains, with internal agency correspondences obtained through the Freedom of Information Act, how the Forest Service attempts to subvert environmental laws and deceive the public to pursue the timber production agenda. It is providing a false sense of security regarding fire and using the fear of fire to ramp up timber production. This is a betrayal of the public trust. The disregard for timber sale impacts on other publicly valuable forest resources further damages the agency’s credibility, and discredits its ability to fairly and objectively perform this task.

However, I would contend that favoritism toward the timber industry is actually a long-running practice of the Forest Service, not a new occurrence. After all, the agency presided over the decimation of forest ecosystems, which is what inspired the NWFP. At any rate, it is a valid rationale for removing the Forest Service from authority over the Northwest Forest Plan revision.

The purpose of the NWFP is to mitigate ancient forest (old growth) habitat damage and loss due to the Forest Service’s timber sale program from the 1950’s through 1990’s. The original NWFP was appropriately written by scientists, not the timbering arm of the agency. Therefore, the present planning authority being placed in the hands of Forest Service line officers and independent NEPA consultants is inappropriate and not in the public interest.

I contend that the Forest Service is institutionally and irretrievably biased toward commercial logging, and is therefore unqualified to write an objective revision of the NWFP. The plan should be prepared by an independent team of forest scientists, including zoologists; botanists; dendrologists; mycologists; entomologists; ornithologists; etc. In short, an interstellar, galactically conceived Plan that doesn’t presume the universe revolves around the manipulation and exploitation of the natural world.

Over nearly 50 years, the NWFP forests were by far the biggest timber-producing national forests in the country before the consequences of the Forest Service’s bounty-based “ASQ-“ driven timber sale program dismembered their ecological composition. Yet under the NWFP DEIS, the Forest Service seeks to return these forests to a timber production priority based largely on biased interpretations about fire and how to control it.

I was trained by Forest Service experts like Art Keener, Steve Harbert, and Duke Denny in fire behavior and suppression. Based on that accumulated knowledge and contact with many fire and forest scientists, it is clear the Forest Service is making vast generalizations and unqualified assumptions about fire in the DEIS. It fails to justify that logging will decrease the number of wildfires or lessen their intensity. Nor does it explain how present logging techniques are more ecologically sensitive than those of the past, which radically depleted habitats and turned wild forests into poorly-managed tree farms.

The Forest Service is pretending it can control fire with logging, which is frankly hubris wrapped in remedial logic. There's no quantifiable scientific proof of this contention, rendering the provisions to allow logging for wildfire management nothing more than massive forestry experiments. Further, such contentions are rendered inept in the age of climate change, as the fire equation has been altered, and fires will continue to be abnormally large and intense no matter how forests are managed.

In the DEIS, the Forest Service is telling the American public that it can be trusted to address and achieve the following needs:

“Improving wildfire resistance and resilience across the NWFP area;

Strengthening the capacity of NWFP ecosystems to adapt to the ongoing effects of climate change;

Improving conservation and recruitment of mature and old-growth forest conditions, ensuring adequate habitat for species dependent upon mature and old-growth ecosystems and supporting regional biodiversity;

Incorporating Indigenous Knowledge into planning, project design, and implementation to achieve forest management goals and meet the Forest Service's general trust responsibilities;

Providing a predictable supply of timber and non-timber products and other economic opportunities to support the long-term sustainability of communities located proximate to National Forest System lands and economically connected to forest resources.”

I dispute the agency's ability to accomplish these objectives based on its record. Moreover, the final objective on this list is not relevant to the purpose of the NWFP, whose goal is (or should be) to conserve intact forests and to restore biological habitat. “Providing a predictable supply of timber...” creates incentives that contradict the primary objectives of “...strengthening the capacity...improving conservation and and recruitment...(and) ensuring adequate habitats...” of old growth [ancient] forests.”

Of what benefit is it to ancient forest habitat that there be a “predictable supply of timber?” This implies that a timber quota will be pursued regardless of its effects on the assumed priority of

protecting the habitat for endangered species. History has already shown us this is the path toward failure.

Any commercial timber that is yielded from management actions enabled under the NWFP should be considered a bonus, not an expectation, because all forest resources other than sawtimber production have been depleted by the misrepresentation that everything, from water to wildlife; recreation to biodiversity, is compatible with the Forest Service's logging program. It has been graphically proven that they're not.

And I beg, please don't tell us this timber production provision was a RAC recommendation, because most folks know the Forest Service cherry-picks the RAC recommendations it likes, and ignores those it doesn't.

The public is led to believe that by applying the same management policies that caused the fracture of the forest ecosystem to begin with, subsequently inspiring the need for the NWFP, the Forest Service can "fix" our public lands.

Contrary to both common sense and science, the Forest Service still enthusiastically and unabashedly preaches the same doctrine that existed before the forest sciences advanced in the 1970's, and proved a healthy forest is *not* a forest only of healthy young trees. Even after vast advances in forest ecology, the Forest Service remains rutted in the same misguided track that caused the ecological depletion problem to begin with, and is thus unqualified to rewrite the NWFP.

For example, in the DEIS, the Forest Service still adamantly insists that insects and disease are undesirable and can be controlled with logging. It insists that mechanical manipulation and commodity-based management can contrive a forest that is "resilient" to these natural occurrences, when in fact they are natural forest components that have been scientifically proven essential to forest survival.

Forests are not seen as ecosystems in agency parlance, they are a commodity to be exploited at any cost. This has remained both an institutional philosophy and a bureaucratic mantra. The institutional culture of the Forest Service is contrary to protecting and restoring forest ecosystems, thus, the NWFP FEIS should be prepared by an independent team of forest scientists.

II. Crazy Little Thing Called Law

The DEIS continues a consistent agency history of including loopholes in management plans that allow commercial logging under vague and arbitrary circumstances, often to the detriment of other forest resources, and contrary to law. After all, if the law is broken, no one in the agency is held responsible. The basis of this propensity is a matter worthy of examination, and therefore is relevant in this forum.

America enacted Laws like the National Forest Management Act, Endangered Species Act, National Environmental Policy Act, and the Wilderness Act largely in response to public outrage over the deforestation of the national forests and the increasing public appreciation for nature.

But the agency has made a practice of finding devious ways to sidestep those laws, and ignored them when they couldn't be avoided. This is shown by the plethora of successful lawsuits against the agency, including the "spotted owl lawsuit," which precipitated the NWFP.

The Forest Service documents that were the basis of the *Columbia Insight* story shows that finding ways around or through laws governing the management of federal lands to pursue timber quotas remains an agency priority. This unquenchable drive for producing sawtimber is wrapped in a plethora of poor excuses to log, which only indicate that irresistibly, the Forest Service's knee-jerk answer to every question and solution to every problem is, "more logging," and the laws be damned.

Proof of the timber first philosophy is exemplified in another of the agency's recent policies: shockingly, the Forest Service has been busted for conducting commercial timber sales during wildfire suppression efforts. (*Seattle Times*; "Rushing to Stop a Fire That Never Came.")

Giant trees up to eight miles (and upwind) from the front of the Wolverine Fire were felled and hauled to a sawmill. This practice is of course a convenient means of defying federal laws, as the agency can get away with practically anything by claiming it's related to wildfire suppression. This practice means no environmental review, no public notification, and no rules to constrain logging operations.

As a former wildland firefighter, I can testify that the last thing firefighters need is an ongoing commercial logging operation in the midst of their work areas.

The Twisp River Road used to be one of the most spectacular recreation corridors in the national forest system, with its 15 miles of pristine natural scenery, six rustic campgrounds, nine trailheads, and proximity to the Chelan-Sawtooth Wilderness and North Cascades National Park. But in 2020, the Forest Service called in logging companies who conducted a massive logging operation at the height of the Cedar Creek Fire in an area far from the front of the fire. Now the Twisp Corridor is a marred avenue of stumps, ripped up ground and slash piles, and awaits the Midnight "Fuels Reduction" Timber Sales, which will add to the damage and condemn it to being an industrial logging zone for years to come.

And no one is taking responsibility. I wrote to the Methow District Ranger and volunteered to organize a group of local people who would donate their time to cleaning up the mess, but got no response. If laws are eschewed, and the people in charge are unwilling to take responsibility for mitigating the damage, what do we have left to protect our public land?

The legal de-evolution continues apace, as the Forest Service recently championed a new set of CFR rules designed to “streamline the process” (more efficiently crank out the timber):

Condition-Based Management is a vehicle to void environmental and legal considerations in a logging project by allowing the agency to change logging prescriptions after the EA is finalized. It also conjured up *Designation By Prescription*, which allows the logging contractor to select the trees to be cut instead of resource professionals.

How agonizingly pitiful is it that in the age of *climate change*, where standing green forests are critical toward combating this Earth-threatening tragedy, ramping up the removal of trees remains the Forest Service’s number one priority. The policy for logging to mitigate climate change is kind of like prescribing chemotherapy to the patient because they might get cancer.

All the preceding is not designed to offend, but to illustrate that the Forest Service has no respect for law, and is not trustworthy. For my part, when you’ve heard the same empty lines about how maximized logging is going to be good for everybody and everything in the long run, but each and every time you wind up with a dagger in your back, at what point do you give up on believing that collaboration with the agency will yield a positive outcome? I haven’t given up, but have acquired a healthy dose of skepticism.

I’m actually a staunch proponent of: “Let’s sit down and work things out, maybe we can find common ground.” But since my first involvement with the Forest Service on the Mount Hood National Forest in 1975, I’ve seen 50 years of deceit, broken promises, outright lies, deliberate law-breaking, and the fracture of irreplaceable ecosystems. I’ve watched as good people in the agency were ignored, and even persecuted. I’d be naive to ever expect a newly enlightened Forest Service. That’s why I repeat: the Forest Service should not be writing the NWFP.

I shudder when recalling the magical places I visited in my youth and held sacred, that have been slaughtered by Forest Service timber sales: Breitenbush; Metolius; Silver Creek; Upper Lewis; and Imnaha. The list goes on. When you’ve witnessed the obliteration of a forest legacy that is precious to you and valuable to all of humanity, which is recklessly carried out by the government entity that’s appointed as its steward, one tends to get depressed.

My personal hope with regard to the NWFP revision—if the agency fails to cede the process to scientists—is that forest advocacy organizations that haven’t been coerced into complacency with grants from the National Forest Foundation will litigate the amended NWFP FEIS, based on its violations of the Endangered Species Act. Because there’s no reason to believe that under the present authorities the FEIS won’t be the same loophole-riddled logging enabler as the DEIS.

And now, with the present Administration and its shameless bias toward an unconstrained industrial free-for-all, and homage to consumption-based economics spiced with scientific ignorance, it appears all the laws America enacted to protect our forests from the Forest Service will be whittled down to empty, meaningless doctrines—shredded; just like the pride of our national forests.

III. The 40x14x8' DEIS Loopholes, and Legibility

What's really strange (or not) about the DEIS is that finding out exactly what the Forest Service plans to change about the NWFP is next to impossible to locate. Specifically, what does the Proposed Action mandate? All the management direction is spread out willy-nilly. I had to seek help to find it, and I've been reading NEPA documents for nearly 40 years. Why is there no guide informing one how to find the most important part of the document?

Even the Table of Contents is nearly impossible to follow and understand. And due to the Pinyon Public formatting for the DEIS, I found it impossible to do keyword searches to try and find aspects of the plan I'm most interested in. It's funny how the bulk of the plan direction for Alternative B is found in an appendix, not the body of the DEIS.

Would it be so hard to place the "guts" of the Plan—what it actually changes—in one spot, and use wording for plan direction that actually makes sense? Could the general public, most of whom don't have the time nor expertise to understand the document, not be provided with a summary of the actions proposed?

A friend of mine is a retired English teacher who frequently visits the national forests and is interested in policy. She once offered to put together a dictionary of Forest Service terminology, nearly all of which is designed to deceive the reader and make bad things sound good. One of my favorites is an old EA from the Mt. Baker National Forest that described erosion caused by logging operations as "Activity-generated soil-sediment output." I still laugh every time I think about it. So does the Siuslaw National Forest name for clearcuts: "created meadows."

Those were fun, but here's something along another line of thinking (or not thinking): Under the Proposed Action (Alternative B), "Language Changes by Alternative," the direction for the Proposed action says, "Retain and augment with: FORSTW-LSR-PMA-01-B, FORSTW-LSR-MOI-STD-01-B, FORSTW-LSR-MOI-STD-02-B, FORSTW-LSR-MOI-GDL-01-B, FORSTW-ALL-DRY-OBJ-01-B, FORSTW-ALL-DRY-STD-01-B, FORSTW-ALL-DRY-GDL-03-B."

Seriously? Can any Forest Service official honestly claim that anyone but the authors can figure out what that actually means? How is anyone even supposed to know how to get a definition of that bizarre and incomprehensible series of letters and numbers?

The DEIS is so convoluted, I can't even follow the page numbering. However, since I'm semi-retired, and have the time, I somehow managed to go through most of the DEIS, and was not surprised to find exception after exception to safeguards restricting human activities in the Proposed Action.

The document is filled with vague loopholes that allow District Rangers and Forest Supervisors almost unfettered discretion to log under conditions that make no more sense than setting ad-hoc

rules for naked dancing. I'll spare the reader of these comments the pain and volume involved in listing all of them.

Such is the Forest Service process for the plan: one must be an expert on Forest Service process and planning to even slightly understand this document. Or, one must hire a lawyer skilled in reading an EIS to make heads or tails of anything. The wording is filled with so much obtuse gobbledegook conveyed in sappy agency parlance, I liken it to trying to read a novel written in Cyrillic.

Without a simple summary that explains in plain language what Plan direction is, the general public is relegated to impotent bystanders. It's almost as if (chuckle, chuckle) the agency wants to make it as difficult to follow and understand as possible. Obviously, the authors aren't very proud of their creation.

As an indicator of some of the content I could grasp, I was struck by several of the DEIS's vast generalizations. Here's one example: there are continuous references in the DEIS to identifying forests under two broad categories—dry forests and wet forests. Are we to believe all forest ecosystems from California to British Columbia can be characterized under these two categories?

For example, there are dry forest types in the Siskiyou National Forest that are completely different ecologically from the dry forests of the Okanogan-Wenatchee National Forest, but there's no distinction in the DEIS. Are we to believe that the same management direction for preventing unnaturally large wildfires applies to both areas?

In general, the Plan provides for so many exceptions to "maintain natural forest components to protect endangered species," it's like 'air pudding.' It dictates human activities to mitigate for the components of nature that seem, by the agency's funky judgements, to be incompatible in the short term with protecting trees. *There is no temperance whatsoever.* The whole point of the Plan should be to protect species, not to perpetuate an agency culture that began with the cult-like proclamations and philosophy of Gifford Pinchot.

Once again, *The Forest Service as an institution is incapable of rewriting the NWFP because it has an inherent bias toward "management," i.e.; doing things to the land, and possesses a compulsion to ramp up logging in the national forests that transcends all reason, law, or appearances of objectivity. It has virtually no respect for, or faith in natural succession. It cannot write a plan that can be grasped in content and language by even intelligent people who are interested in the management of their national forests.*

If I were to consider litigation against this Plan, I would cite caselaw (See, Northwest Coalition for Alternatives to Pesticides v. EPA) that a NEPA document must be legible to a person with a high school education, and is remanded if it isn't. This one isn't. Of course, there's a lot of other legally vulnerable aspects of the DEIS, and only a complete about-face in the FIES might possibly salvage it.

IV. Smokey Says ‘Put It Out’

I could find no section in the DEIS that articulates a strategy for, nor exhibits any interest in, preventing human-caused fires. A study by the University of Colorado, Boulder’s Earth Lab (published in *The Smithsonian*) found that, based on Forest Service data, 84 percent of wildfires are human-caused.

The NWFP DEIS purports that logging is the preferred solution for fire management, and to combat climate change. This logic says we should rush to initiate logging projects to try and control the size and intensity of many fires that would not even occur with an effective prevention program. It also provides no reasonable surety that the logging projects will be effective in achieving the fire risk reduction objective.

It has become a common mantra in all aspects of human life: the best way to confront bad things is to prevent them from happening. The least expensive, least impacting, and most effective activity that should be employed to reduce the risk of unnaturally large wildfires to communities—and to ecosystems—is prevention of human-caused fires. But the only Forest Service “prevention” initiatives I know of are those Smokey Bear TV commercials, and a few signs that go up on forest roads in springtime.

What kind measures? A prevention effort could include: (a) initiating more intensive public education through signage and personal contacts with the public by agency professionals; (b) requiring the possession of fire instructional materials for people with camping and hiking permits; (c) enforcing stricter rules for campfires and the use of fire for any purpose; (d) imposing stiffer consequences for violating fire restriction rules; (e) working with communities to ensure the general public avoids the use of fire in the outdoors; (f) stepping up patrols in and around popular recreation sites; and (g) initiating forest closures, including prohibition of logging activities, during times of extreme fire danger.

Prevention is not a solution only for dry forest types, it applies directly to the wetter and less fire-impacted west side forests: the tragic fires in the McKenzie and Santiam River Watersheds in 2020 were caused in part by the failure of the Forest Service to implement and enforce prevention measures.

The agency could have required the shutoff of electrical transmission lines crossing national forest land when it knew a potentially devastating windstorm was approaching. Instead, Forest Service officials sat on their hands, and later tried to duck any responsibility as these human-caused fires devoured a wild forest legacy, destroyed towns, and killed several people.

At least one of the people who perished had dedicated most of their life to stopping the Forest Service’s planned logging of these idyllic forests. The tracts of forest they succeeded in protecting from logging against all odds are now victims of a policy of complacency.

Not surprisingly, the Forest Service response in the aftermath of the Lyons/Santiam fire was to try and initiate a massive salvage logging along over 400 miles of Forest Service roads. Billed as a “public safety” measure to avoid compliance with environmental laws, this project involved logging an expanse 200 feet on either side of national forest roads, many of which weren’t even open to the public.

The agency also failed to suppress a small wildfire above Elk Lake for over a month before the killer wind hit. They let it burn because it was allegedly “too dangerous to fight.” As a wildland firefighter, I know there’s no such thing as a fire that cannot be fought with modern firefighting equipment.

The failure to include a plan for preventing human-caused fires in favor of addressing wildfire through aggressive, hands-on ecosystem manipulation—attempting to reconstruct the forest ecosystem by logging it—exposes unsavory and devious priorities.

Incidentally, in the broader sense regarding fire management, the NWFP amendment should explain how the Forest Service intends to strike a balance between protecting communities from unnaturally large wildfires, and simultaneously restoring natural wildfire regimes. Without a strategy to manage fire, we can only assume the national forests will be subject to perpetual “management” that attempts to control ecosystem conditions, with no intent to allow natural forces—including naturally-ignited fires—to resume their historic role in shaping the ecosystem.

V. NEPA: Not a Hollow Formality

Yes, I’ve met a lot of bright and conscientious Forest Service employees, some who tried to steer the agency toward being an ecologically lucid entity from the inside. Whether or not, dear reviewer, you’re in that category, I appreciate your attention up to this point. This section on NEPA is especially enlightening.

Prior to the 1972 National Environmental Policy Act (NEPA), there was no requirement that the federal government involve the public in its land management decisions. And there was no requirement that the Forest Service entertain multiple management options for consideration in making its decisions, nor any means to reduce the ecological impacts of its projects. The prior practice involved “risk assessment,” which basically meant a determination of how far the resource could be pushed before it broke. Actually, there was no actual planning at all prior to NEPA, only contracts between the Forest Service and timber purchasers.

The Forest Service should consider NEPA a positive process that helps the agency to make reasoned decisions, rather than a procedural pain in the neck. Suggesting otherwise only says the agency wants to do whatever it wants, and to hell with the public and the ecosystems.

My recommendation: *an EIS should be required for all projects under the NWFP that purport to reduce forest fuels in sub-watersheds.*

My exposure to Forest Service NEPA compliance (or lack thereof) involves monitoring four huge “fuels reduction” timber sales in the Methow Ranger District of the Okanogan-Wenatchee National Forest: Mission, Twisp, Midnight, and Upper Methow. Three of these projects are around 50,000-60,000 acres in size, but are being authorized with an Environmental Assessment (EA) and a “Finding of No Significant Impact” (FONSI). All the EA’s present only a single action alternative.

Huh?

This is such a crass disrespect of NEPA, I remain embarrassed for, and ticked off with, the people in charge of this charade. And those are only the outwardly illegal aspects, there’s so much more wrong with these projects. But I’ll table more elaborate discussion, and refer the reader to my comments on each project. Frankly, the MRD is actively and deliberately violating federal law, ignoring pertinent science, rigging the public process, and suspending the directives of the NWFP in order to fast-track these projects, collectively totaling nearly 200,000 acres.

It appears the MRD and OWNF are betting they can get away with the violation of law and discarding of ethical principles because they figure the fear of fire will override those concerns in the minds of the public, congress, and even the judiciary.

The EA’s for these projects address a “Purpose and Need” that focuses on reducing wildfire risk. But they ignore the scientific studies that contradict the logging solution to wildfire. They avoid any consideration of fire prevention measures and base their legitimacy on the remedial contention that fewer trees means less fire.

Objectively, the issuance of FONSI’s for these projects is thoroughly nonsensical because the projects *must* have a significant impact to achieve their objectives of drastically altering the forest’s ecological composition. And incidentally, these projects are in substance very little different than the timber sales of the past that, along with wildfire suppression, caused the fuels buildup problem to begin with.

The goal of these projects is to “restore historic, more fire resilient forest conditions.” This objective is inherently flawed from the outset for several reasons: 1) there is no site-specific information that reliably confirms what historic conditions were; 2). It cannot be assumed that the conditions shown in limited records are static, unchanging conditions; 3) there’s no evidence historic conditions can be re-created with logging; 4) the artificial conditions created will not sustain indefinitely; and, 5) climate change has altered the present and anticipated conditions that would exist either in the absence, or presence of the project.

The portrayal of past forest conditions isolates a single, arbitrary point in time, and propounds that since that's the way the forest looked 100 years ago, that's the way it's supposed to look all the time. Really? I thought everyone recognized the fact that forests are dynamic, constantly changing and evolving.

Amusingly, the logging prescriptions being applied in these projects attempt to replicate a forest condition that closely resembles the much drier Deschutes National Forest. The unique ecological composition of the North Cascades forests, based on the area's topographic structure and weather, are ignored. Precipitation in the North Cascades is around four times the levels in central Oregon. This exposes these projects as being based on a generic, cookie-cutter forest condition.

Further, the claim that historic conditions can be restored with logging is contradicted by the following studies, quotes, and articles:

“Have western USA fire suppression and megafire active management approaches become a contemporary Sisyphus?” by DellaSala, et-al.

“Objectives and considerations for wildland fuel treatment in forested ecosystems of the interior western United States,” by Reinhardt et-al.

Quote: “...fuels reduction projects on federal land had little or no impact on preventing the loss of homes and communities.” Jack Cohen; physical scientist at the Forest Service Fire Sciences Laboratory in Missoula, MT.

“Response to Commentary, Counteracting Wildfire Misinformation” by Jim Furnish, in *The Smokey Wire*

These studies have not been acknowledged in the project EA's. At the very least, they demand additional action alternatives that propose plans of action that reflect their findings. They support the full analysis of options that propose alternate means of protecting homes and communities.

These MRD projects are not a proven-effective means of achieving the (uneducated) estimation of what forest conditions should be. They also aren't a proven effective way of reducing wildfire danger. This renders them to nothing more than a grandiose forestry experiments whose credibility is at best questionable.

An EA and a FONSI are a completely unsupportable finding, and only serve to satisfy the objective of expediting, no, rushing the projects by subverting NEPA. Given the gravity of their goals and the urgency of climate change and wildfire danger, these projects should be subject to intensive scrutiny via analysis of all pertinent science, and preparation of an EIS.

Another hair-raising issue is the public involvement process being initiated for these projects: the MRD is colluding with the North Central Washington Forest Health Collaborative to develop the Proposed Actions, while denying other publics the opportunity to be involved. Those outside the Collaborative are given 30 days (or less) to comment on hundreds of pages of technical documents. They can only attempt to compel changes in the Proposed Action, which already has the buy-in of agency personnel and the companies, trade associations, and organizations that compose the Collaborative. Consistently, the Proposed Action nearly always becomes at least the foundation—if not the explicit template—for the Preferred Alternative in the NEPA decision.

Forest Service leaders here are deliberately shutting out the local people and groups who have geographic and ecological knowledge of the local forests. This is particularly insulting, because many of the Forest Service employees designing and overseeing these projects have little knowledge or experience with the local forest ecosystem.

On a related note regarding public involvement, I personally attended a couple of the NWFP RAC meetings. I was struck at the meeting in Olympia, Washington, when in their final comments, nearly every member of the RAC questioned the Forest Service's overbearing control of the RAC process. Hopefully members of the RAC and the organizations, tribes, and interests they represent will see fit to expose another example of how the Forest Service has a graphic and fanatically pursued institutional agenda.

Also in defiance of NEPA, the MRD has rejected independent alternatives. Local citizens and organizations have submitted alternatives that focus on, for example, intensive thinning of dense stands; treatment of ground fuels within the Wildland-Urban Interface with prescribed burning; implementing a fire prevention program; and bolstering local firefighting capabilities. But these very reasonable alternatives were rejected out-of-hand. This shows how little respect agency leaders have for the public they are supposed to be representing.

Thus: the NWFP should contain a provision wherein an EIS is required for all projects that purport to pursue wildfire risk on a watershed basis, and thereby guarantees a public process that is inclusive; complies with federal law; considers all pertinent science; and provides an honest examination of social, ecological, and economic impacts.

Incidentally, the EA's for these MRD projects proudly announce that "community economic stability" via timber production is one of their goals. But there are no sawmills in the Methow Valley, and only one logging company. The dominant industry in the Methow is outdoor recreation-based tourism, which will be damaged by these projects because they will degrade the recreation experience by marring the forest's natural ambiance and primitive character.

The projects will also have a significant impact on the lifestyle and well-being of local residents. Tracts of forest in key recreation and scenic corridors will be reduced to industrial logging zones. Log truck traffic on local country roads, a marred viewshed with stumps, ripped up ground, logging slash and marred topsoil will dominate. But these concerns have been virtually ignored.

The Forest Service calls the Methow Valley a “Fireshed.” It is not. It is a watershed within an incredibly rich and productive ecosystem. People in the Methow Valley do not want their economy stumped under the sensationalized premise of fire fear, nor will they see our land reduced to a resource colony that supplies timber to faraway sawmills. I seriously hope someone with influence reads these comments, and let’s the people upstairs know about the horrific things happening on the MRD.

VI. A Plan is a Plan is a Plan

Nearly the entire 55,009 acre area of the aforementioned Midnight Project on the MRD is within a Late Successional Reserve, and designated Matrix lands. However, the Forest Service is proposing to “temporarily suspend” the NWFP to better facilitate timber production that is incompatible with the present direction for LSR’s. This is so bizarre and obviously subversive, I nearly fell off my chair when I saw it.

The NWFP must carry the force of law. No administration or agency can suspend law, it takes an act of Congress. Isn’t that what the NWFP DEIS is proposing, to amend the direction contained in the Plan? Why the frantic rush to take drastic, unprecedented action to suspend the Plan to railroad a project that is so obviously contrary to NWFP objectives?

When the Forest Service is showing a propensity for such radical and irrational action, it is implicit that the NWFP succinctly state it cannot be revised or suspended.

VII. Ecosystems Cannot Be Manually Reconstructed

Rather than rushing massive, watershed-wide commercial timber sales, fuels reduction efforts authorized under the NWFP should be meticulously designed via an inclusive public process. They should be surgical, and consider every scientific analysis and apply every management tool that could to help reduce unnaturally large concentrations of fuels. NWFP forests should not be subjected to massive logging operations under the unfounded assumption that forest Ecosystems can be manually reconstructed to meet an arbitrary “desired (or historic) condition.”

The proposed fuels reduction projects being proposed and implemented in areas covered by the NWFP are experiments, for example the 55,009 acre Midnight Project on the OOWNF. Aldo Leopold once said, “The first law of intelligent tinkering is to save all the pieces.” Areas protected under the NWFP should not be subjected to heavy-handed experiments driven by the ulterior motive of producing fodder for sawmills.

Further, some fuel loading that may seem excessive is perfectly natural, and important to many species of wildlife. The objective should not be to eliminate all dense stands of timber in any forest type, but to concentrate careful thinning in unnaturally dense fuel concentrations in the Wildland Urban Interface close to communities.

Recommendations for intelligently designed fuels reduction projects under the NWFP are as follows:

- * Programs to prevent human-caused fires must be developed prior to implementation of any mechanical fuels reduction.
- * The objective of fuels reduction should be to increase the likelihood of stopping the spread, and reducing the intensity of *moderate* intensity wildfires. High intensity fires cannot be reasonably controlled, but communities can be protected.
- * Any use of logging, i.e.; the removal of standing/living trees to reduce fuel loading, should be restricted to dense thickets of small diameter standing timber, sometimes known as “crowded,” or “overstocked” stands. A 10” DBH rule should be imposed.
- * Treatment of downed timber should be emphasized, and practiced via lopping and prescribed burning. Both activities should be limited to the wildland-urban interface and near developed recreation sites.
- * All logging should be noncommercial, authorized via stewardship or service contracts. Contractors should be paid with money, not trees, so there is no incentive to cut fire-resistant trees.
- * The Forest Service should support federal funding to bolster the initial attack and community defense firefighting capabilities of local communities.

There is no scientific consensus or material proof which indicates commercial logging projects can successfully reduce wildfire risk without further damaging important habitat for endangered species. NWFP should therefore not authorize sweeping, ecosystem-altering activities that will unquestionably degrade the present habitats and ecological structure of NWFP forests.

The Jim Furnish commentary in *The Smokey Wire* cited instances where fuels reduction logging had no impact on wildfires that occurred in the area post-project. It is a myth that the Forest Service can use “management” to change forest structure over vast areas to successfully facilitate fire safety, or a return of “historic conditions.”

Natural succession is already in the process of facilitating ancient forest health, and restoring fire resilience. For example, the Cedar Creek Fire burned a 10,600 acre portion of what is now the Midnight Project.

Huge logging projects will unquestionably impact the natural succession that is in the process of facilitating ancient forest evolution and restoring fire resilience. Recent wildfires have reduced ground fuels, including dense stands of standing trees, and while some of the fires resulted in

stand replacement burns, these were not the rule, and science tells us that what we call “stand replacement fires” are perfectly natural.

In fact, in “*Countering Omitted Evidence of Variable Historical Forests and Fire Regime in Western USA Dry Forests: The Low-Severity-Fire Model Rejected*” by Baker, et-al, uncovered a Forest Service effort to hide the fact that stand replacement fires are indeed historic, not an unnatural new anomaly.

Intensive logging of ancient forest stands, including the removal of trees up to 21 inches or greater, results in accumulations of logging slash, facilitates blowdown, increases wind velocity, dries out ground fuels, and promotes the growth of flammable shrubs and forbs. This cannot be described as an “improvement” of forest conditions. For example, what the Forest Service often calls “ladder fuels” are natural succession in an uneven stand that will allow younger trees to replace the loss of large, old trees. The uneven tree size also creates a natural barrier that deflects wind, thus reducing wildfire velocity.

It is stunning that despite all the evidence that the proposed massive fuels reduction projects will degrade undisturbed habitats, remove or degrade habitat important to species like pine marten and pileated woodpecker, the Forest Service proceeds under the one-dimensional philosophy that fewer trees means less fire. Nature can and does restore itself. The compulsion for “management” is an exhibition of impatience an Ingrained anthropocentric philosophy.

VIII. Climate Warming or Global Change?

Whatever we call it, it is threatening everything we know about life on Earth. It is impossible to adequately describe the despair involved in seeing the Forest Service exploiting this phenomenon for its own purposes, and claiming it is helping to solve the problem by doing exactly what it shouldn't be doing: removing carbon-storing trees, an irrational and illogical proposal. The DEIS fails to justify the contention that logging will help to mitigate climate change based on an intelligent examination of the climate problem.

To quantify that this proposal is an uneducated and unjustified roll of the dice, this rationale purports that: there might be a wildfire; it might be an unnaturally large fire; it might not be suppressed with modern firefighting techniques; it might kill more trees than the proposed logging activities; and it won't provide any natural ecosystem benefits associated with natural wildfires toward restoring overall wildfire resilience.

In all honesty, this is not an adult head-scratcher, it falls short of the logic required to impress a second-grader. I don't apologize for this directness, being a guy who thinks life on Earth is important. Remember my mention of prescribing chemotherapy to a patient because they might contract cancer?

Once again, the climate change discussion and direction illustrates the Forest Service insistence that the only thing that can be done to address wildfires and mitigate climate change is “management,” i.e.; commercial logging.

Initiating fire prevention measures and retaining live trees are the best things the agency could be doing to address climate change *and* reduce wildfire risk. These things would require only a fraction of the budget that’s being shoveled into more self-serving “management.”

IX. Much Anticipated Epilogue

The *Northwest Forest Plan* should be a document that requires and enforces temperance, not one that covertly authorizes unproven forestry experiments allegedly to prevent things (wildfires) that may not even occur, and might actually benefit the forest ecosystem and enhance the forest’s benefits to society.

The US Forest Service policy of ASQ, timber sales, and the self-serving brand of “management” unravelled forest ecosystems and drove wildlife toward extinction. Based on the internal Forest Service memos uncovered by *Columbia Insight*, the DEIS seeks to return to those days of timber quotas by talking sweet with eco-friendly terms, while religiously avoiding concrete protection for endangered ecosystems.

It has been exposed that the agency has a hidden agenda. But still, the DEIS follows a path that presumes the public will buy into the remedial explanations due to its fear of fire, while the timber-production-at-any-cost politicians will safeguard the agency. The DEIS fails to mandate policy that protects natural forest components, but rather relies on the arrogant philosophy that the agency is smarter than nature. It is incomprehensible that the Forest Service would claim that returning to the same policies that fractured ancient forest ecosystems in the first place will repair the damage done.

To summarize and elaborate on my recommendations for changes in the DEIS:

- 1) The Forest Service should surrender oversight of the NWFP EIS process. The Secretary of Agriculture should appoint a panel of forest scientists to write the FEIS.
- 2) All loopholes that enable ground-disturbing activities should be eliminated, and only a supplemental EIS can address special circumstances that might require “management.”
- 3) The FEIS should develop and implement a program for fire prevention prior to conducting any fuels reduction activities.
- 4) The FEIS should dictate that an Environmental Impact Statement is required to authorize any fuels reduction projects that involve commercial logging under the lands protected under the NWFP.

- 5) Condition-Based Management and Designation by Prescription should be disallowed.
- 6) The FEIS should state succinctly that it is the force of law, and the national forests under its auspices may not suspend, terminate, or amend it.
- 7) There should be no logging or tree removal of any kind in Late Successional Reserves.

Human prosperity, well-being, and ultimately survival are attached to the natural integrity of western forest ecosystems. They provide climate regulation, pure water, oxygen, fish and wildlife habitat, recreation and inspiration, and biodiversity. That should be the priority for the NWFP, not perpetuating an agency culture of misguided “management.”

Hopefully these frank, from-the-gut comments are helpful. Feel free to contact me any time, on or off company time.

Sincerely,

Richard K. Bailey
icilybear@gmail.com
P.O. Box 1086 / 9 Rader Road
Winthrop, WA 98862