



"There are places on earth, that have a powerful sacred connection. This is such place, where the fierce power of the ocean, and the ancient trees in the rainforest can speak. If you stop, listen, you will feel the heartbeat, and the spirit of the land, where the first peoples, lived, loved, laughed, and shared the earth, with all the other living creatures, for thousands of years. Here, you can find your place in nature, where you feel you belong in the world, and be changed, forever." **Introduction to "Inspiring through Nature" video of the Wild Pacific Trail, Conclusion at end.*

March 17, 2025

US Forest Service

RE: Comments on Northwest Forest Plan Amendment #64745

Hello:

With Respect and Gratitude, let me address you, all who read this, as all my relations, for we are all connected, all related in so many unknown ways . . . on wonderful Earth . . . surrounded by the starry starry skies of our galaxy in the Universe.

A New Time, New Purposes: "Islands of Hope"

Federal lands, especially National Forests, are islands of hope, in a world of climate change and biodiversity loss as unprecedented crisis in human history. National forests were set aside at a time when their need was realized, when management of reserves would ensure future timber supply. But, given the ecological crisis before us, given **forests are more than trees**, given they now serve many human purposes, from recreation to the clean water, clean air and other ecosystem services they provide, the original purpose of lumber, is only but one purpose that needs to be realized today. Indeed, given **commercial logging operations and industrial timber management has created tree plantations** and not forests, and that at least one National Forest, Siuslaw in the Coast Range of Oregon, is surrounded by such -- degraded at best, destroyed at work, and devastating in size -- such industrial tree plantations managed for profit and capital gain.

"Forests, are more than just trees, they're an ecosystem."



Beyond National Forests, Larger Landscape Context

When taken in the larger context of the whole landscape, National Forests needed purposes now, their primary, if not their only purpose, needs to be as “islands of biodiversity,” as islands of healthy forest ecosystems, as reserves and refuges, where only logging that benefits and focuses on maintaining, promoting, protecting, enhancing and restoring their forest ecosystems. Indeed, this approach to forest management, **ecological forest management,** would be how all National Forests would be managed forever. When such an approach is taken, then healthy ecosystems would seem to ensure the ecosystem services, such as clean water and air, however, management of National Forests also needs to take into account the **larger context of the surrounding landscape**, to mitigate the human impacts of industrial forest management, such as the spraying of herbicides and pesticides which pollute land, water and air. The question then becomes, how do National Forests manage their lands at the very least to mitigate the ecological harm from surrounding tree plantations, and at the most, how can surrounding lands be managed to prevent such harm from happening in the first place? In other words, how can larger landscape management ensure and protect the needs of both people and wildlife within a landscape where the areas surrounding National Forests are managed as industrial tree plantations focused on profit, and especially when the external costs of biodiversity loss and pollution are disregarded?

Fair Market Value, Increased Revenues

In keeping with ecological forest management, such that the United States government, in the end, the people of the United States, whose public lands are held in trust for us all, how does the US government **get a fair price** when timber companies bid to cut down trees? That is, **the time has come to require a fair market value to be paid,** and not a give-away to the lowest bidder. This needs to be taken into account, such that any bidder **must meet the reserve fair market value value** in bidding as the minimum acceptable amount that can be bid, and then let the competing bids come in higher than that. In this way, not only are the American people given a fair shake for their public lands, but also **the US Forest Service generates increased revenues** based on fair market value and as such, the funds needed to do their work in managing their National Forests.

"While conservation traditionally focused on protecting single species, current practitioners often focus on protecting entire ecosystems or even groups of adjacent ecosystems, or landscapes. This trend increases the probability that we will protect the large-scale processes (such as nutrient cycling) that biodiversity depends on."

Society for Conservation Biology, FAQ, Official Website



Greg Johnson, Unsplash

The previous points are the guiding principles and key questions which my comments are meant to address as follows:

Responding to Public Scoping Themes with Ecological Forest Management

Fire Resistance and Resilience, Forest Stewardship, and Climate Change

The public scoping process for the Northwest Forest Plan (NWFP) amendment has highlighted several key themes. These themes will be addressed from the perspective of ecological forest management (EFM), which emphasize maintaining ecological integrity and resilience.

1. Tribal Inclusion and Rights

Response: Ecological forest management recognizes the importance of integrating Indigenous knowledge and practices into forest management. These strategies would support this by advocating for collaborative management that respects tribal sovereignty and incorporates traditional ecological knowledge. This approach enhances biodiversity and ecosystem resilience while honoring cultural values and practices of Indigenous communities.

2. Economic Opportunities

Response: Ecological forest management aims to balance economic activities with ecological sustainability. These strategies would support sustainable forestry practices that provide economic benefits without compromising the health of forest ecosystems. This includes promoting eco-tourism, non-timber forest products, and sustainable timber harvesting that maintains forest structure and function.

3. Fire Resilience

Response: Fire resilience is a critical component of ecological forest management. Franklin's strategies emphasize the use of controlled burns and thinning to reduce fuel loads and restore natural fire regimes. This approach not only protects communities from catastrophic wildfires but also enhances habitat diversity and ecosystem health.

4. Climate and Ecosystem Integrity

Response: Maintaining ecosystem integrity in the face of climate change is central to Franklin's ecological management strategies. This involves protecting old-growth forests, which are crucial for carbon sequestration, and promoting landscape connectivity to facilitate species migration and adaptation. These actions help mitigate climate impacts and preserve biodiversity.

5. Carbon Sequestration and Storage

Response: Ecological Forest Management strategies would prioritize the conservation of mature and old-growth forests for their significant carbon storage capabilities. Protecting these forests helps mitigate climate change by sequestering carbon, thus contributing to global climate goals. This approach aligns with the broader objectives of the Northwest Forest Plan (NWFP) to enhance forest resilience and ecological function.



Siuslaw National Forest, Cape Perpetua: Peter Robbins, Unsplash

6. Community Protection

Response: Ecological forest management includes measures to protect communities from natural hazards such as wildfires and floods. These strategies advocate for creating defensible space around communities, restoring natural water flows, and enhancing forest structure to reduce the risk of catastrophic events. These measures ensure that communities are safer and more resilient to environmental changes.

7. Adaptive Management

Response: Adaptive management is a cornerstone of ecological forest management. This approach involves continuous monitoring and adjusting management practices based on scientific data and ecological feedback. This ensures that forest management remains responsive to changing conditions and new information, thereby maintaining ecological integrity and resilience over time.

In conclusion, addressing the themes from the public scoping process through the lens of **ecological forest management, ensures that the NWFP amendment will enhance forest health, protect biodiversity, and support sustainable community development.**

Communities

The proposed action described in the NOI indicated that the Forest Service seeks to amend the NWFP through the addition of plan direction that **supports the long-term sustainability of communities**, including those located near National Forest System lands and those that are culturally and economically connected to forest resources.

- Theme 1 – The NWFP Amendment should provide a reliable and predictable timber supply to support the region’s forest sector and local communities.
- Theme 2 – The restoration work needed to increase resilience to fire, and climate change requires an economically sustainable timber industry.
- Theme 3 – The Forest Service should support forest sector workforce development in local rural communities.

- Theme 4 – The NWFP Amendment needs to address shortfalls in the Probable Sale Quantity that have resulted in a backlog of timber that should have been offered.
- Theme 5 – The regional economy has changed over the last 30 years and rural communities are no longer dependent on the timber industry.
- Theme 6 – The NWFP Amendment should evaluate environmental justice concerns.

Responding and **addressing these specific themes from the perspective of ecological forest management, consistent with their respective strategies**, as follows:

Theme 1: Reliable and predictable timber supply

Ecological forest management (EFM) recognizes the need for a sustainable timber supply but **prioritizes ecosystem health** over predictable harvest volumes. This approach would focus on selective harvesting and variable retention techniques that maintain forest structure and function while providing some timber. This may result in lower but more sustainable harvest levels that support long-term forest health and community stability.



Theme 2: Restoration work and economic sustainability

EFM strategies align well with this theme. Ecological forest management **emphasizes restoration activities** that enhance forest resilience to fire and climate change. These activities, including thinning, prescribed burns, and habitat improvement, **can provide economic opportunities for local communities while improving forest health**. This approach creates a synergy between ecological goals and economic sustainability.

Theme 3: Forest sector workforce development

Ecological forest management supports this theme by **promoting a diverse skill set in forest management**. This approach would encourage training in ecological restoration techniques, sustainable harvesting methods, and ecosystem monitoring. This **diversification of skills** can help rural communities adapt to changing forest management practices and create new job opportunities.

Theme 4: Addressing Probable Sale Quantity shortfalls

From an ecological perspective, rigid adherence to predetermined harvest quotas can be detrimental to forest health. These strategies would **prioritize adaptive management** based on current forest conditions and ecological needs rather than meeting specific timber targets. This may mean reevaluating and potentially adjusting harvest expectations to align with **sustainable ecosystem management**.

Theme 5: Changing rural economies

Ecological forest management acknowledges this shift and supports diversifying rural economies. This approach would encourage developing non-timber forest products, eco-tourism, and ecosystem services markets. This diversification can help rural communities become more resilient while maintaining their connection to forest resources. **Outdoor recreation is especially valued by visitors and residents alike in the region of the NW Forest Plan,** from hiking and biking to wildlife viewing, and is yet another value to be highlighted in the amended plan.

Theme 6: Environmental justice concerns

Ecological forest management strategies inherently address environmental justice by promoting forest health, which benefits all communities. This approach would consider the equitable distribution of both the benefits (such as ecosystem services) and potential impacts (such as changes in resource availability) of forest management across different communities, including historically marginalized groups.

Further, **I concur with the Coast Range Association's (CRA) comments and key recommendations as follows:**

"Current SNF Human Disturbance Since 1994, the Forest Service has commercially thinned former clearcut areas for the purpose of enhancing the development of Late Successional forest conditions . . .

Key Recommendations:

- 1. Recognize and incorporate wet and rainforest life zones, coupled with Plant Association Zones and Mean Annual Increment metrics into a revised set of mapped forest types.
- 2. **Recognize, incorporate and celebrate the world class growth and accumulation of forest biomass** – including above ground carbon for all moist, wet and rainforest areas.
- 3. Ecologically account for past forest removal from the SNF and all national forests.
- 4. Discard the notions of fuel load and industrial wildfire use for wet and rainforest life zones. We (CRA) support the DEIS approach of not using fuel load reduction, a totally unwarranted strategy, for moist, wet and rainforest zones.
- 5. Consult relevant tribes for proper fire use in wet and rainforest life zones"
- Also, **Late Successional Forest needs to be kept intact** for the purpose of further enhancing the development of old-growth forest habitat to ensure a healthy ecosystem.

Therefore, **ecological forest management, offers a balanced approach to addressing these community themes.** It emphasizes long-term forest health and ecosystem resilience while supporting sustainable economic opportunities and community well-being.

"Every species is a masterpiece, exquisitely adapted to the particular environment in which it has survived. Who are we to destroy or even diminish biodiversity?"

E.O. Wilson, Biologist

Backlog of Timber Offerings

Addressing the backlog of timber that should have been offered is a complex issue when viewed through the lens of ecological forest management. Here are the steps that might be taken, considering ecological strategies:

Reassessment of forest conditions:

- Conduct comprehensive ecological surveys to determine the current state of forest health, biodiversity, and resilience.
- Evaluate **how forest conditions have changed** since the original timber offerings were planned.

Ecological impact analysis:

- Assess the **potential ecological impacts of harvesting** the backlogged timber.
- Determine if harvesting this timber aligns with current ecosystem management goals.

Prioritization based on ecological needs:

- Identify areas **where timber harvest could benefit forest health** (e.g., overly dense stands needing thinning).
- Prioritize harvests that contribute to **ecological restoration** or fire risk reduction.

Adaptive management approach:

- Develop a flexible plan to address the backlog over time, **adjusting to changing ecological conditions.**
- Implement harvests gradually to monitor and assess impacts on forest ecosystems.

Integration with restoration activities:

- Combine timber harvests with other restoration activities to enhance overall forest health.
- **Use revenues from timber sales to fund additional ecological restoration projects.**

Stakeholder engagement:

- Collaborate with local communities, tribes, and environmental groups to ensure harvesting plans address diverse concerns.
- **Educate stakeholders on the ecological approach to managing the backlog.**

Sustainable harvesting methods:

- **Employ ecologically sensitive harvesting techniques like variable retention and selective cutting.**
- **Ensure harvesting maintains** forest structure, habitat diversity, and ecosystem functions.

Long-term planning adjustment:

- **Revise future timber sale plans** to better align with ecological forest management principles.
- **Develop more realistic and ecologically sound timber offering targets for the future.**

Monitoring and research:

- **Implement robust monitoring programs** to track the effects of addressing the backlog.
- **Conduct research to inform best practices** for managing similar situations in the future.

Economic considerations:

- **Evaluate the fair market value of harvesting any area as timber stand**, using it to develop a minimum reserve amount required as the starting point for any competitive bids.
- Consider alternative uses for some of the backlogged timber that may no longer be commercially viable, such as logs placed in streams to improve habitat for fish.

These considerations aim to address the backlog while prioritizing ecological integrity and long-term forest health, in line with ecological forest management strategies.

Emphasize that the approach to “timber sales,” both in terms of revenues and how the specific land area is managed, be changed as follows:

- The minimum acceptable bid amount must meet a fair market value assessment of what such a timber sale would bring if say, it were being offered on non-public lands
- The entire area was not clearcut, unless it was somehow consistent with ecological forest management, and for example, only selective cutting were allowed
- For each accepted sale bid a management plan needs to be submitted and approved by the USFS consistent with ecological forest management before any action is allowed
- The need for US Forest Service staff to monitor such cutting so that only trees allowed to be cut, could be cut
- Any violation would authorize the USFS to enforce the termination of the sale immediately, forfeiting the money bid and paid for the sale, consistent with being in violation of the purchase agreement.

With Reverence, for we are all related . . . and in Kinship with all life on Earth

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**". . . Once you have truly heard the wind, felt the ocean, and blended with the land, you will be inspired by your sacred connection to the Earth and do anything to protect her."*



"Fog cloaks Cape Perpetua in the Siuslaw National Forest," NOAA, Unsplash