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Regional Forester Jacqueline Buchanan  
Pacific Northwest Region  
U.S. Forest Service  
1220 SW 3rd Avenue  
Portland, OR 97204

Regional Forester Jennifer Eberlien  
Pacific Southwest Region  
U.S. Forest Service  
1323 Club Drive  
Vallejo, CA 94592

**Re: Northwest Forest Plan Amendment Draft Environmental Impact Statement**

Regional Foresters Jacque Buchanan and Jennifer Eberlien,

My name is Michael Gaskill. Please accept the following comments on the Northwest Forest Plan Amendment (NWFP) Draft Environmental Impact Statement (Draft EIS). Thank you for the hard work your teams have put into this effort. As you will read, I am critical of many aspects of all of the proposed action alternatives. However, I have tremendous respect for the time, consideration, and effort that has gone into this project. I hope my comments reflect that spirit of respect.

Living in the Central Oregon Coast Range, where I was born and raised, the Siuslaw National Forest is my “home forest”. The SNF is an island of (semi) intact forest amidst an ocean of industrial clearcuts, virtually the only expanse of land in the Coast Range with any habitat protections at all. I have also spent significant time in over a dozen of the National Forests and several of the National Parks covered by the Northwest Forest Plan.

Our Pacific Northwest forests are an unparalleled resource, and any land management decisions must weigh many interests, some of which are complementary and some of which may be in conflict. The action alternatives proposed in the NWFP DEIS all represent the Forest Service’s efforts to achieve balance, but none of them correctly value the ecological, climate, and habitat benefits of intact, Mature and Old Growth (hereafter MOG) forests. I believe that all of the proposed action alternatives would result in a net loss of MOG on NWFP land, when what is needed is a significant net gain in both of those stand types.

We are in a critical window of time to act in the face of the worsening climate crisis. The actions you take on our public lands in the coming years will have enormous long term consequences for

our region, and the world. I hope you understand the gravity of the moment we are in, and the immense responsibility you have to steward our public lands for current and future generations.

Below I will briefly address a few specific areas of concern and support.

**Forest Biodiversity and Climate Resilience:**

While there are interesting and potentially beneficial components in some of the action alternatives, on net, they would all weaken forest protections, especially regarding MOG, water quality, and wildlife habitat. I will leave it to organizations with lawyers to go into detail on these points, but any changes to the NWFP must strengthen protections in all three of those critical areas.

I am also strongly against any alterations to the current plan which would result in an expansion of roads within National Forests. Roads have many known negative impacts to the landscape, including harm to watersheds, introduction and spread of invasive species, and more. Importantly, most destructive fires are human caused, and the more roads there are in the backcountry, the greater the risk of human caused fire.

**Tribal Inclusion:**

I am in full support of all Tribal inclusion measures which are spread throughout the three action alternatives. These are long overdue steps in restoring Tribal rights and Tribes' right to co-manage the land of which they are the rightful inhabitants and stewards. I applaud the work of the FAC and Forest Service staff to identify and propose these components.

**Fire:**

I am also in favor of some of the beneficial fire components, especially with respect to Tribal cultural burning, but much more work is needed to properly recalibrate the Forest Service approach to fire. Fuels reduction and other active fire management efforts should prioritize home and community fire resilience. Active management treatments should be concentrated on the home ignition zone, where the science shows they can be most effective.

Additionally, fire treatments not directly adjacent to communities should focus on non-commercial treatments preserving and restoring MOG. Commercial logging for fuels reduction is ineffective at best, and can be counterproductive in many cases. For instance, cutting large, fire resistant trees to pay for restoration activities (as happens in schemes like stewardship contracts and good neighbor authority) is not supported by science, and is completely inappropriate for bolstering forest fire resilience.

**Labor and Local Economies:**

There is little mention in the DEIS about labor conditions or standards. This is an important oversight which must be corrected. Labor exploitation of Forestry workers by private contractors is widespread, and Forest Service contracts should have strong labor standards and protections, along with verification methods.

Likewise, although the Forest Service gives much lip service to supporting rural economic development, it is a well known fact that most of the economic benefit from commercial forest activity and Forest Service contracts flows to urban areas. If the Forest Service is committed to rural economies, much more must be done to ensure that more economic benefit stays in rural communities.

Thank you again for the opportunity to submit these comments. Thank you for your work, we and generations to follow are relying on you to act with courage and strongly protect these forests in this critical window of time to act in the face of the worsening climate crisis.

Michael Gaskill  
Eddyville, Oregon