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Comments: I'm supportive of the Forest Service's NW Forest Plan Amendment, and how it will tighten up elements of the plan related to five key issues. However, I am very concerned that, for the thousands of commentors, this will just be an exercise in futility. Given staff reductions in the federal government, are these goals and objectives even achievable? Will priorities be changed since Trump assumed the throne with the new MAGA administration of loyalists? If so, why couldn't the Forest Service, now under Chief Tom Schultz's watch, inform us public to not waste much time reading or responding to the plan amendment by March 17 as it is going to be round-filed (ie. shitcanned) and replaced with a proposed action calling for greatly increased timber production, degraded wildlife habitat, reduced recreation opportunities, and abolishment or disregard of established laws and regulations such as those pertaining to the Endangered Species Act, Clean Water Act, National Forest Management Act, O&C Act, etc.?

Perhaps a better approach would be to extend the public comment period for another 30, 60 or even 90 days, and in the meantime, coordinate with the incoming administration officials like Secretary of Agriculture Brooke Rollins, Chief Tom Schultz and their MAGA compadres from the timber industry lobby to see if they truly intend to pursue the elements of this plan and its amendment. I don't like wasting my time, and I'm sure that thousands of other public commentors feel the same way.

We are hurting out here in rural Western Oregon. Essential county services continue to be greatly reduced, largely because of reduced federal timber harvest receipts (since the 1980s) coming back to the O&C Counties. Despite the elements of this plan amendment developed largely during the Biden administration, I now portend changes in the way public lands will be managed. I expect our new government to have drastically different policies for timber & wildlife habitat mgmnt in the O&C Lands. They are just now becoming clearer as more and more executive orders are signed. I currently live in Roseburg where reduced timber harvest receipts since 1982 have resulted in the curtailment of many essential services, closure of county libraries, logging and closure of parks, more fees, and major local government staff reductions.

I searched on-line for Trump's past statements about forest management. On You Tube, President-elect Trump speaks about his conversations with Sauli Niinistö, former President of Finland, another "forest nation." Will the incoming administration advocate for some European timber management practices to reduce wildfire danger? President-elect Trump has referred to the need for "cutting to provide 50-yard swaths throughout the forest for fire breaks" and "raking the forest floor." If he still advocates for these or other things, they should definitely be included and analyzed in the DEIS.

This also goes for other such presidential directives, such as those:

- 1) curtailing lumber imports from Canada or overseas. Address this in the DEIS.
- 2) declaring a national emergency related to wildfires. Address this in the DEIS.

3) desiring to delist threatened or endangered species. Address this in the DEIS.

2) convening the "God Squad" to override the rule of law. Address this in the DEIS.

These and many more items are all within the context, purview and scope of this DEIS to amend the Northwest Forest Plan. Whenever possible, impacts should be fully analyzed and quantified for each in regard to direct and indirect adverse and beneficial impacts, irreversible and irretrievable and cumulative. There are so many changes happening at present in policies and direction that the plan amendment, as presented in the DEIS, is a Red Herring. While at one time, it may have been well-intentioned and scientifically sound, the plan amendment no longer seems relevant under the current administration. Let's not kid ourselves.

Former USFS Chief Randy Moore's redefinition of "old-growth" was already thrown out at the end of Biden's term in office. How does the current Chief Schultz intend to define and manage "old-growth" and "mature" timber?

As written, the current plan amendment misleads and distracts from a relevant and important questions, such as those posed above. This plan amendment now seems to be a strong-smelling diversionary tactic that is detracting from the real issues at hand in regard to forest management, wildlife habitat protection and timber production. The plan amendment cannot be built on a bunch of smoke screens and fallacies. It now needs to be updated to be honest, open, transparent, relevant with full disclosure and analysis of how the current administration's forest management policies will create impacts. Some elements of the plan amendment as proposed may still be plausible but appear quite unlikely, now ultimately irrelevant and diversionary. It's sad that the plan amendment was not completed prior to November 8, 2024 (election day) or January 20, 2025 (inauguration day). We the public do not appreciate conscious intentions now to misrepresent the program or mislead us into thinking that all is well.

The listing of the northern spotted owl and a reduction in timber harvest receipts to the O&C Counties is often blamed, by our Douglas County commissioners, for such things a library and park closures, landfill fees, greatly reduced local government services (including public safety) and more. On Sept 30, 2024, the commissioners permanently closed our beloved, beautiful 23-acre Pass Creek Park in Curtin, Oregon (Interstate 5, Exit 163).

Developed in a partnership with Native American Tribes, BLM, Forest Service, ODOT and Oregon State Parks, I'd like to see a Visitor Center built there to provide interpretation of Native American use of the area, History of The O & C Lands, Timber Management in the O & C, Wildlife Habitat Management, Recreational Opportunities in Western Oregon. Hiking, camping, picnicking and wildlife viewing would also be available there. I've lived in Oregon since 1971 and still get the sense that many Oregonians don't fully understand the history and complex management of the checkboard O&C Lands. I wouldn't be surprised if the next administration promotes revision of FLPMA, disposal of public domain lands, and perhaps the transfer of the O&C Lands back to the States and Counties.

As part of your recreation initiatives in the plan amendment, do you think the current administration could support such an idea for an O&C Lands Visitor Center & invest in it? At a minimum, we could greatly use a few encouraging words from you. Perhaps you could also send some encouragement and support to the hard-working, dedicated career civil servants in the USFS and BLM in Western Oregon.

I'd be interested in your perspectives regarding potential federal investment in Western Oregon to partner with the O&C Counties & provide a BLM- & USFS-managed interpretive center along I-5 to explain history of the O&C Lands, their management challenges & recreational opportunities. A vision is for something like The Oregon Trail Visitor Center (near Baker City) or the Red Rock Canyon NCA Visitor Center (near Las Vegas).

A current opportunity exists with the closure of Douglas County, Oregon's actively-managed 23-acre Pass Creek Park in the unincorporated area of Curtin (at Interstate 5 Exit 163). The property sits very close to the Lane/Douglas County line. The park was permanently closed on 30 Sept 2024 and will likely be sold at auction in the near future. The property may present just the perfect location for a County, State & Federal Partnership to interpret the management challenges of The O & C Lands. Please read the attached articles in The Roseburg News-Review and Oregon News Herald about it.

Thanks for your efforts and attempts to present a fairly well-thought-out plan amendment, based on science. Sadly, under the current administration, I do not see it being ever approved or implemented. Please rewrite the plan amendment to accurately reflect and analyze what is forthcoming on our public lands.

I would also like to see the plan amendment acknowledge and analyze the points below. If I missed them during my perusal of the document, please reference those pages where I can find them addressed. Your planning criteria should be built based on these factual statements. Feel free to fact-check and inform me if any of these points are wrong.

- 1) mills have become increasingly automated,
- 2) quite a few unmilled logs are shipped to Asia,
- 3) some timber companies transferred operations to the south where labor was cheaper and trees grow faster,
- 4) construction industries had less use for high quality lumber from old-growth logs,
- 5) mills started using lower grade southern lumber for chipboard, waferboard, plywood,
- 6) Oregon mills started producing less labor-intensive products,

- 7) spotted owl got listed and some harvest restrictions were implemented,
- 8) spotted owls now compete for habitat with more aggressive barred owls,
- 9) at one time, the government wanted to spend about \$1.5 billion killing 465,000 barred owls.
- 10) Oregonians have gotten more & more polarized in the last 40 years,
- 11) laws call for timber production, economic stability, watershed protection, recreation and multiple uses on public lands, (see attachment re: history of the O&C Act)
- 12) timber should be managed on a sustained-yield basis,
- 13) many logging jobs have been lost in the PNW since the 1980s,
- 14) job training helped former loggers find new careers,
- 15) not much old-growth remains on private timber company lands,
- 16) most of Oregon's remaining old-growth is on federal lands,
- 17) Biden's plans for identifying and protecting old-growth were recently scrapped (announced USFS Chief Forester Randy Moore), what is the current Chief's position on this?
- 18) old-growth is not "over-mature," decaying, and ripe for harvest,
- 19) old-growth and mature stands provide rich biodiversity,
- 20) logging has been implicated in landslides, flooding, water quality degradation and reduced fish populations.
- 21) forestry practices have changed over time to leave snags, standing trees, dead/down timber, multi-storied stands with openings,
- 22) other land management practices have changed too. From stream-cleaning, we now spend big bucks on instream restoration, culvert replacement, riparian enhancement & road decommissioning,
- 23) good ecosystem management provides biological diversity while still allowing for commodity production and adaptive management,
- 24) climate change is real,
- 25) wildfires have become large, destructive, and frequent.
- 26) 18 O&C counties depend on timber harvest receipts from federal forest lands to provide services,
- 27) receipts have been greatly reduced since the 1980s,
- 28) timber "safety net" funds continue to come to counties from reauthorization of bills like the Secure Rural Schools & Self-Determination Act,
- 29) Curry County depleted its "General Fund" dollars,

30) Josephine County had to pass a special public safety tax levy,

31) Douglas County has a limited, finite supply of "General Fund" dollars left before they're depleted (in about three years at current rate of expenditure),

32) there's been little political motivation to bring loggers, mill workers, foresters, officials, and conservationists together,

33) we all need to try harder to communicate with honesty and transparency to find common ground, build consensus and develop proactive solutions.

Thank you.

Respectfully,

Joe Ross

Roseburg, Oregon

ATTACHMENT-OTHER: OandC ACT History.doc; Narrative on the history of the O&C Lands Act of 1937

ATTACHMENT-OTHER: COUNTY OandC Lands JOE ROSS.doc; Additional comments regarding the O&C checkerboard patterned public lands by Joe Ross

ATTACHMENT-Other: COUNTY FreemanOpinion22Jan17647.jpg; Opinion piece in The News Review titled, "Recreational activities are not a substitute for timber industry"

ATTACHMENT-FIGURE/IMAGE: COUNTY Oregon timber harvest 1905-2010.jpg; Graphs showing Oregon Timber harvest (mbd) from 1905-2010 on public and private lands

ATTACHMENT-OTHER: PASS CREEK 12 Sept Press Release014 (2).jpg; Douglas County Parks Department notice of closure for Pass Creek County Park and Campground

ATTACHMENT-OTHER: PASS CREEK NDH Rusty Savage DEC2024016 (3).jpg; Newspaper clipping from the North Douglas Herald by Rusty Savage regarding the closure of Pass Creek Park and Campground

ATTACHMENT-OTHER: PCP Colleen Shaw Letter002.jpg; Letter to the editor newspaper clipping by Colleen Shaw regarding Pass Creek Park

ATTACHMENT-OTHER: PCP COLOR Front Page ONH Jan 2025004.jpg; Newspaper clipping in the Oregon Herald regarding the Pass Creek Park Sale

ATTACHMENT-OTHER: PCP Joe Ross Stmt 001.jpg; Newspaper clipping of commenter's comments regarding the Umqua Dunes Redevelopment Plan