Data Submitted (UTC 11): 3/16/2025 4:00:00 AM
First name: Carol
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Organization:
Title:
Comments: I am very concerned about increasing logging on US Forest Service land. I am a citizen, not an expert, and I understand the difficulty of managing everyone's strong convictions. I understand we need logging, AND I am also confident we need CO2 sinks through healthy forests. Forests of the world are different. Pacific Northwest forests are CRITICAL to CO2 management for years to come. We need COMPLEXITY in our forests. Trees need to grow for 80 years before being cut, and we need small clearcuts. Thinning cannot mean cutting at 40 years, or cutting giant areas. Older trees lead to healthy forests and ecosystems, increasing the likelihood that a forest will resist fire.

I am also attaching a study from my economist friend Ernie Niemi who is an expert on the economics of forest management.

Please carefully consider the future of our forests.

Thank you.

ATTACHMENT-REFERENCE: NWFP Final Report 2025-0310.pdf; Deficiencies in the Socioeconomic Elements of the Draft Environmental Impact Statement (DEIS) for the Northwest Forest Plan Amendment (NWFPA) By Ernie Niemi, 2025

Deficiencies in the Socioeconomic Elementsof the Draft Environmental Impact Statement (DEIS)for the Northwest Forest Plan Amendment (NWFPA)By Ernie Niemi10 March 2025In November 2024, the U.S. Forest Service (USFS) released its Draft Environmental Impact Statement(DEIS) for the proposed Northwest Forest Plan Amendment (NWFPA). A central element of the proposalemphasizes increasing the predictable annual timber supply from NWFP lands, and the DEIS asserts thatthe increase will yield economic benefits by supporting job and businesses in local communities andstrengthening the overall economies and sustainability of those communities.The DEIS, however, ignores a large body of evidence that indicates the proposed increase in timberproduction probably will have the opposite economic effect. This evidence shows that, today and for theforeseeable future, NWFP lands probably will support more jobs, businesses, and sustainable economicactivity in local communities if left unlogged than if managed, as proposed, to provide a predictableincrease in timber supply. Two factors underlie this conclusion: the economic benefits from increasedlogging probably will be small, but the economic costs probably will be high.Timber production is a small and declining component of the region's economy. Its ability to support jobs,businesses, and economic activity has declined for decades and likely will continue to decline into theforeseeable future. Against this backdrop, the proposed increase in timber supply from NWFP lands likelywill yield few, if any of the desired economic benefits.In sharp contrast, NWFP lands left unlogged have supported and likely will continue to support

strong,sustainable growth in jobs, business, and economic activity. They do this by making important contributionsto one of the region's most important economic strengths: a quality of life that hosts a large and vibrantoutdoor recreation industry, and enables communities to attract and retain workers and new business. Theproposed increase in predictable timber supply likely would weaken, perhaps reverse, these contributions.The loss of jobs, business, and economic activity likely would far outweigh any timber-related gains.The next two sections detail support for these conclusions. The first identifies some of the importanteconomic evidence, ignored by the DEIS, that indicates the net economic impacts from an increase intimber production probably will be negative. The second then demonstrates that the DEIS relies onspeculation, rather than on evidence, to support its conclusion that there is a socioeconomic "need" toincrease the predictable timber supply from NWFP lands.I. The DEIS ignores evidence that indicates the net economic impactsfrom an increase in timber production probably will be negativeThe DEIS:1. Ignores the negative impacts of timber production on other sectors of the economy.2. Exaggerates the potential number of jobs from increased logging.3. Ignores the costs timber production imposes on society.4. Ignores the costs timber production imposes on taxpayers.Ignores Negative Impacts of Timber Production on Other Sectors. The DEIS shows that the USFSrecognizes NWFP lands generate jobs in different sectors:"Table 3-21 shows that in 2021 the identified Forest Service program areas supported an estimated26,500 jobs and $1.7 billion in labor income. The extraction and consumption of forest products (forexample, timber and forage for grazing), recreation visitors, and agency operations (for example,agency salaries and equipment use) all contribute to employment and income in communities. [hellip]Viewed in terms of total jobs supported, recreation visitation is the largest contributor to the regionaleconomy, supporting an estimated 12,551 jobs, followed by agency operations (7,070 jobs), and forestproducts (5,091 jobs)." [3-109]The DEIS does not, however, explain that there can be powerful tradeoffs: generating new timberproductionjobs can reduce jobs in other sectors. The evidence for this conclusion is broad, longestablished,and well-known among knowledgeable economists. For example, in 2003, more than 100economists, including two Nobel Laureates, co-signed a letter describing the economic importance of thenatural environment in western states.1 The core message states:"Environmental Quality Is a Major Source of the West's Long-Run, Economic Strength"In the distant past, the West's natural resources were widely abundant and important to theeconomy primarily when they were converted into something else. We converted forests,mineral deposits, and streams into lumber, metals, and hydroelectricity; valleys, wetlands,and hillsides into agricultural and urban landscapes; and land, water and air into wasterepositories."Today, conditions have changed. [hellip]"The structure of the western economy has changed. Though still important, extractiveindustries (logging, mining, and commercial fishing) and agriculture now play a smallereconomic role because their ability to generate new jobs and higher incomes has declined.Across most of the West, a community's ability to retain and attract workers and firms nowdrives its prosperity. But if a community's natural environment is degraded, it has greaterdifficulty retaining and attracting workers and firms."The economic costs of environmental degradation are rising. As the West's populationincreases, so too do the damages (current and future) from exposure to hazardouspollution and the degradation of environmental amenities. As their habitats shrink, manynative species face an increased risk of extinction. Reversing this trend becomes moreexpensive over time. As ecosystems are degraded, they provide fewer economicallyvaluable services, such as cleansing the water in streams, and communities thereforemust provide replacement services with water-treatment plants and other costlyinvestments."The economic benefits of protecting and restoring environmental quality are large andincreasing. As the West's population increases, the West enjoys greater economicbenefits by avoiding exposure to hazardous pollution, maintaining scenic natural vistas,extending the availability of recreational opportunities in clean environments and on publiclands, and sustaining the existence of undeveloped lands and healthy ecosystems."Misleading price signals slow economic growth. Inefficient pricing of many naturalresources encourages waste and diminishes economic productivity by allocating resourcesto low-value uses, while higher-value uses languish. Subsidies to irrigation, logging, publiclandranching, and mining prop up activities that would not take place under efficient,market conditions. [hellip]"As these and related changes evolve, the economic health of western communitiesincreasingly will depend on the health of the environment." [pp. 2-3, bold emphasis inoriginal]In 2011, more than 100 economists, including three Nobel Laureates, and academics in related fields cosignedanother letter that reinforced the core message with these statements:2"The U.S. is now predominantly a service-based economy, and the fastest-growing regions arethose that have been able to attract talented

workers, entrepreneurs, and investors acrossall sectors of the economy. In the West especially, public lands play a pivotal role inattracting and retaining people and businesses. This is the case for all sectors, includingmanufacturing. [hellip]"Today, one of the competitive strengths of the West is the unique combination of wide-openspaces, scenic vistas and recreational opportunities alongside vibrant, growingcommunities that are connected to larger markets via the Internet, highways andcommercial air service. [hellip]"America's public lands can be used responsibly while expanding protections for the nation'sworld-class natural amenities. We urge you to create jobs and support businesses byinvesting in our public lands infrastructure and establishing new protected areas such asparks, wilderness, and monuments." [1]The DEIS recognizes that NWFP lands provide amenities that can affect the "Socioeconomic trajectories"of communities. [3-126 - 3-127] It does not, however, consider the research that indicates the influence ofthese amenities can far outweigh the influence of timber production. Nor does the DEIS present readerswith evidence showing that timber production can diminish the influence of amenities, having negativeimpacts on jobs, incomes, economic wellbeing, and long-term sustainability that overwhelm anyspeculated, short-term impacts from the production of logs.Some of the evidence ignored by the DEIS shows that, by protecting federal forests from logging andenhancing environmental quality throughout the region, the NWFP has made significant contributions to theeconomic strengths economists called out in these two letters. These protections signaled immediate andpersistent increases in the quality of life available to residents in the region, and supported the economiesand the wellbeing of communities[mdash] urban and rural[mdash]throughout the region. For example, researchersfound that proximity of small communities to protected federal forests in Oregon experienced higher medianincomes, faster populations growth, and higher property values.3 These benefits materialized even forcommunities that continued to exhibit high levels of timber-related activities. Protections for federal forestssimilarly supported economies and wellbeing of urban communities, with some of the benefit spilling over torural communities. for example, as the favorable quality of life supported urban growth, it often generatedhigher tax payments that were transferred to rural communities to strengthen their schools, infrastructure,etc.Timber production also can have a negative impact on the value of opportunities for outdoor recreation onfederal lands. The tradeoff is not trivial. Research on federal lands in the Snake River Basin, for example,found that their recreational value was 3-to-4 times the value of their timber value.4 A 1993 economicanalysis found that the net economic benefit recreationists receive, over and above what they pay, forrecreation activities on federal lands covered by the NW Forest Plan averaged about $160 per acre(converted to 2013 dollars).5 This information, though dated, clearly shows there is a high likelihood that thebenefits from managing the NWFP lands to provide recreational opportunities would far exceed value frommanaging the lands to convert trees into logs and stumps.The economic benefits from unlogged NWFP lands extend far beyond outdoor recreation. Economists andpolicymakers have long known that these forests provide amenities that boost the economies of nearbycommunities and larger regions by attracting many workers, households, and entrepreneurs. A 2013 recentanalysis concluded that, on average, counties with more public land protected from logging and otherextractive activities enjoy increased economic performance. After statistically controlling for the influence ofother factors, the researchers found that, on average, a western county with 10,000 additional acres ofprotected public land exhibited higher average per capita income, faster growth in per capita income, andfaster growth in non-labor per capita income.6An even more recently completed review of this phenomenon found that amenities on public lands havebeen transforming the economies of communities across the West:"During the past three decades, rural communities in the American West have experienced significanteconomic restructuring, transitioning from extractive-based industries toward service-based economies.A major impetus for economic restructuring in the Western U.S. (hereafter, the West) has been amenitymigration, a phenomenon in which people relocate to communities for physical and social amenitiesderived from an abundance of desired ecosystem services as opposed to simply following employmentopportunities. These amenity migrants include footloose entrepreneurs, retirees, and people willing totrade income for a higher quality of life. [hellip] [P]ublic lands have consistently been shown to play a role inattracting amenity migrants."7 [Citations omitted for brevity]The last sentence of this text indicates that, by managing NWFP lands to produce attractive amenities, theForest Service could encourage significant economic restructuring, transitioning away from extractivetimber production and toward a service-based economy. In other words, by producing less timber and moreconservation and restoration, the Forest Service could facilitate the transition of local communities awayfrom an industrial focus that evolved in the 1800s and encourage economic

activities characteristic of the21st Century.Much of the text and data in the DEIS, Section 3.8, asserts that increases in jobs will result from theproposed increase in logging on NWFP lands. The DEIS fails, however, to acknowledge the economicimportance of not logging the NWFP lands. It fails to identify and explain economic harms that willmaterialize if the proposed increase in logging on these lands degrades environmental quality, i.e., if thelogging increases exposure to hazardous pollution, degrades scenic natural vistas, restricts the availabilityof recreational opportunities in clean environments and on public lands, and diminishes the existence ofundeveloped lands and healthy ecosystems. The vast research that underlies the two letters describedabove and highlights the direct impacts of the NWFP's protections from logging demonstrates there is ahigh likelihood that the proposed increase in logging will decrease, not increase jobs in local communitiesand throughout the region.Exaggerates the Potential Number of Jobs from Increased Logging. The DEIS compounds the failureto describe the potential job losses in other sectors likely to result from the proposed increase in logging byexaggerating the number of jobs the logging will generate in the timber sector.The DEIS offers this reassurance that increases in the predictable timber supply from NWFP lands willgenerate increases in jobs:"Under Alternative B, direct forest products jobs would range from 1.3 to 3 times the number of jobsunder the No Action Alternative. Alternative D would result in similar but smaller increases, equivalentto 1.05 to 2.74 times the direct jobs supported by the No Action Alternative. Alternative C would, incontrast, result in a reduction in jobs relative to the No Action Alternative. Increases in estimatedvolumes and associated jobs in Alternatives B and D would help sustain existing workforce, facilities,and infrastructure, and in some cases could potentially encourage additional investment. Theseestimates of jobs that could be potentially supported by the removal of merchantable timber under each
alternative capture part of the overall economic activity that would be supported by the restorationactions proposed as part of each alternative." [ES-11]This statement shows the Forest Service recognizes the possibility that the proposed increase in timbersupply from NWFP lands "could potentially encourage additional investment" in the timber industry'sproductive capacity. The DEIS then describes the potential jobs that would result from such an increase inproductive capacity and output of forest-products. But embedded in this statement is the possibility that theproposed increases in timber supply from NWFP lands would not encourage additional investment. Whenthis occurs, the proposed increase in timber supply might have no impact on productive capacity. Suchoutcomes are common. Standard economic theory, plus extensive empirical research, indicate thatintroducing logs from the NWFP lands into the market might reduce log prices, so that those logs displaceand take the place of logs that otherwise would enter the market from other lands.8 The net effect would belittle or no increase in timber-related employment. The DEIS does not identify and investigate thispossibility. This failure suggests that, all else equal, the DEIS exaggerates the actual number of jobs thatwould result from the proposed increase in timber supply from NWFP lands.The DEIS also exaggerates the positive impacts of timber production by failing to account for the likelihoodthat employers in the timber industry will continue to cut labor costs by cutting jobs. It also does notrecognize the likelihood that cuts in employment within the Forest Service, now being implemented by thecurrent administration, will have a negative impact on the number of jobs that might come from theproposed increases in timber supply from NWFP lands. This deficiency appears in the section, JobsSupported by Changes in Timber Volumes by Alternative, with this statement: "Table 3-27 summarizes thenumber of jobs and amount of labor income supported by forest products-related national forestmanagement activities under each alternative." [3-148]Encouragement for timber production from NWFP lands comes from those who assert that it is necessaryto provide economic growth for rural communities and high-paying jobs for rural workers. The number ofjobs for "loggers," an occupational category thatincludes "loggers, equipment operators, truckdrivers, and fallers and buckers," hasn't shownmuch decline in recent years, but the introductionof logging machinery can displace as many aseight logger jobs.9 Moreover, loggers' wages arelow: the average wage for Oregon's loggers hasbeen about 15 percent below the statewideaverage for all jobs.10 In the past, these workersenjoyed wages as much as 30-40 percent higherthan the statewide average, so the currentrelationship indicates that timber production hasbrought long-term economic decline, not growth,on rural workers and communities.11Figure 1. Timber Manufacturing Jobs per Log HaveBeen DecliningFigures 1, 2, and 3 demonstrate the decliningtrends in timber-related jobs. Figure 1 illustrates thelong-term downward trend-for almost threedecades-in timber manufacturing employment perlog in Oregon. Figure 2 shows dramatic reductionsin jobs that can occur while timber harvest remainssteady, with the industry in Oregon

permanentlyeliminating about one-third of manufacturing jobs asit recovered from the Great Recession. Figure 3shows Washington's mining and logging industryand wood processing industry have eliminated jobsthroughout the past 30 years, averaging almost 450jobs per year over the period.12This evidence, and much more with similar findings,show that the DEIS overlooks the reality that thetimber industry eliminates far more jobs than itcreates. As it disregards this reality, the ForestService, instead, offers predictions of future timberrelatedjobs based on a sophomoric assumptionthat the job-per-log relationship of the past willpersist into the future. Thus, Table 3-27 rests on theassumption that if Alternative B were implemented,the Forest Service would produce 590 MMBF oflogs per year and generate 394.6 jobs, year afteryear, without fail. [3-148]The DEIS ignores not just the realities of persistentelimination of jobs in the timber industry, it also ignores the influence of automation, a major factor thatunderlies the job losses. The DEIS, itself, provides evidence of this influence. Interviews cited in the DEISdemonstrate that transitions within the timber industry have dramatically weakened, perhaps erased, therelationship between log production and economic activity in nearby communities: "Another frequent themeinvolved automation in logging and milling occupations. Many participants suggested that automation wasresponsible for a significant reduction in job opportunities and an overall shift in the type of skills thatemployers seek." [3-138] In other words, automation suppresses the jobs and income resulting per unit oftimber production. It lowers[mdash]perhaps eliminates[mdash]thelikelihood that timber productionon NWFP lands will have"significant socioeconomic,cultural, workforce, and financialimpacts on communities andpublics."Figure 2. Harvest Levels in Oregon RecoveredAfter the Great Recession[hellip]But 10,000 TimberJobs Were Eliminated

Logging Levels Recovered[hellip][hellip]but Timber Manufacturing Jobs Did NotFigure 3. Washington's Employment in Mining & Logging andWood Products Manufacturing Has Declined for the Past 30 Years.Recent research in Oregon shows a strong, negative statistical correlation between logging and economicindicators other than jobs. Specifically, counties in western Oregon with more logging have lower medianwages, and a higher percentage of the population lives in poverty (Figure 4).13 These relationships have notbeen specifically tested for Washington and northern California, but there is no reason to anticipate thatsuch tests would yield substantially different findings.In sum, the preceding paragraphs demonstrate the DEIS has not met the challenge of demonstrating thatan increase in predictable timber supply on NWFP lands will improve the wellbeing of a town's residents orsustain the town's long-term sustainability. Instead, the DEIS ignores extensive evidence that shows anincrease in predictable timber supply from these lands likely will have large, negative socioeconomicimpacts on communities throughout the region. Many of the negative impacts will materialize as timberproduction increases the acreage of stumps and logging roads on federal lands, and increases the numberof log trucks on forest roads and on nearby highways. These increases likely will decrease the forests'contribution to the high quality of life that a large number of economists consider a primary source ofeconomic strength for western states. The decrease might be especially harsh for communities proximateto NWFP lands. By being closest to stumps rather than intact forest, and with the highest number of logtrucks roiling through town, they might experience the most severe decline in quality of life and, hence, becut off from this economic strength. When this occurs, the proposed increase in timber production likely willpunish rather than reward the communities the DEIS says need an increase in predictable timber supplyfrom NWFP lands.Ignores the Costs Timber Production Imposes on Society. The DEIS acknowledges that timberproduction can increase the release of carbon dioxide into the atmosphere, thereby contributing to climatechange:"In general, management regimes that promote older forest with relatively low levels of harvest,similar to the NWFP, can yield higher carbon sequestration rates compared to more intensivemanagement approaches." [3-90, citation omitted for clarity and brevity]Figure 4. In Counties in Western Oregon with Significant Timber Harvest, MoreLogging Correlates with Lower Wages and More Poverty.It also claims that timber harvest can reduce carbon emissions from wildfire, but only if the harvest occursin the right time and place, which are difficult if not impossible to predict accurately:"[T]imber harvest in more fire-prone forests yields mixed results in total carbon management, withstudies showing mixed results on the long-term carbon storage benefits of fuel reductiontreatments, depending on how well recently treated stands reduced fire-severity. At a landscapescale, fuels reduction treatments can decrease total carbon stored unless treatments arestrategically placed in the areas with highest likelihood of fire." [3-90, citation omitted for clarity andbrevity]The DEIS, however, never provides readers with estimates of the amount of carbon that likely would endup in the atmosphere as a result of timber production. Nor

does it describe for readers the economic harmsthose emissions would impose on society.The DEIS never explains why it looks away from these issues, even though the information needed toinform readers about them readily available. For example, Oregon produces about 4,000 million board feetof timber (Figure 2) and generates about 35 million metric tons of atmospheric carbon dioxide,14 or about8,750 tons per million board feet. Recent research shows each ton will cause economic damage of at least$200 and probably more than $1,000.15 These numbers indicate that, if the Forest Service produces 1,000million board feet of timber per year from NWFP lands, the economic damage therefrom likely wouldexceed $8 billion. This number far exceeds the potential value of the logs: recent prices have been about$800 per thousand board feet, so the total value of one billion (equal to 1,000 million) board feet of logswould be about $800 million. Thus, with the proposed increase in timber production, the value of the logslikely would be less than ten percent of the climate-related costs that the timber production would imposeon society. The DEIS provides none of this information.Moreover, the DEIS fails to explain that the atmospheric carbon dioxide from the proposed increase intimber production will kill people. A recent, exhaustive survey of peer-reviewed research concluded that it isreasonable to anticipate one human death will result from each 3,700 metric tons of carbon dioxide addedto the atmosphere.16 Data for Oregon indicate that the production of 1,000 million board feet of timber fromNWFP lands per year would generate about 8,750,000 metric tons of atmospheric carbon dioxide, resultingin the death of about 2,400 humans. Other research indicates the number could be ten times larger, or24,000 deaths per year.17A complementary perspective on the carbon-related costs resulting from timber production comes fromresearch by scientists at Oregon State University, who looked at the potential effects on the amount ofcarbon stored on matrix lands under different scenarios that vary the intensity of conservation and loggingactivities.18 The two bookend scenarios are:19[bull] Thinning and fire restoration scenario. This scenario assesses the impact of continuing to managethe matrix lands in a manner similar to how they have been managed to date under the NW ForestPlan. It entails restoring the natural/pre-settlement fire regime, and allowing logging only to thinoverstocked stands.[bull] 60-year rotation scenario. This scenario assesses the impact of managing the matrix lands forindustrial timber production, with a harvest rotation length of 60 years.The analysis modeled the effects through 2100 on all components of carbon storage/release: livevegetation, dead vegetation and charcoal, soil carbon, and manufactured products derived from wood.The results for matrix lands in Oregonclearly show that continuedconservation of the matrix landswould increase the amount of carbonstored, while industrial logging wouldreduce it and release CO2 into theatmosphere (Figure 5). The publishedresults of the research indicate thatthe simple average differencebetween the two scenarios is aboutfour metric tons of CO2 per acre peryear over the period through 2100.These findings are consistent withother research that emphasizes theimportance of conserving matureforests as an effective means for keeping carbon dioxide out of the atmosphere.20Figure 5. Annual Net Carbon Balance on Oregon's NWFPMatrix Lands under Timber-Production and ConservationAlternativesIn sum, the DEIS tells readers timber production on NWFP lands will increase atmospheric carbon dioxide,but then provides no information to let them know the magnitude and significance of the increase. It doesnot explain that just the climate-related economic cost from timber production likely would far exceed theeconomic value of the logs, and additional costs likely would materialize through negative impacts oflogging on water, recreational opportunities, and other goods and services from an unlogged forest. Nordoes it explain that increased timber production on NWFP lands will exacerbate the significant humanhealthimpacts, including deaths, from climate change.Ignores the Costs Logging Imposes on Taxpayers. During the 2nd-half of the twentieth century, theimportance of comparing timber values with logging costs was illustrated by numerous studies thatdocumented instances where logging on national forests produced timber that was worth less than the totalcosts to taxpayers.21 A follow-up analysis, in 2019, found:[bull] "[These lands play a unique ecological role because they represent islands in a sea of heavilydamaged lands managed by states and private landowners. [hellip][bull] "One of the key justifications for ending the logging program on national forests is so they canserve as a buttress against the extinction threat posed by industrial tree plantations.[bull] "Because of their unique role and limited suitability, logging on national forestlands isuneconomical.[bull] "Our analysis finds that the logging program on national forests continues to lose money fortaxpayers in the range of $1.3 to $1.5 billion per year.[bull] When additional federal logging subsidies related to fire suppression and BLM losses are included,the total exceeds $1.8 billion per year.22The DEIS disregards all of these findings. More fundamentally, it never attempts to help readersunderstand the implications of its proposal: taxpayers would bear a heavy financial

burden if there wereincreases in predictable timber production on NWFP lands. It never even mentions the issue.II. The DEIS relies on speculation rather than evidence to support itsconclusion that there is a socioeconomic "need" to increase thepredictable timber supply from NWFP lands[bull] Evidence contained in the DEIS, itself, demonstrates that the "need" for a predictablesupply of timber from NWFP lands stems from speculation, not evidence.[bull] These deficiencies invalidate using this variable[mdash]predictable supply of timber from NWFP land[mdash]to define, evaluate, and compare alternatives.Speculated "Need." The DEIS includes this explanation to insert predictable timber supply into "need" forthe NWFPA:"Purpose and Need for Action[hellip]Need[hellip] This process is driven by[hellip]the need for the Forest Service toadapt their management strategies to current and future challenges. The preliminary need to amendland management plans in the NWFP area described in the Notice of Intent focused on five interrelatedtopic areas: [hellip] Providing a predictable supply of timber and non-timber products and other economicopportunities to support the long-term sustainability of communities located proximate to NationalForest System lands and economically connected to forest resources." [ES-2]This statement implies there is a pressing need to provide a predictable supply of timber to support thelong-term sustainability of some communities. The Executive Summary, builds on this theme, laying thefoundation for defining alternatives based on their ability to increase the predictable timber supply:"Overall plan direction under Alternative B (across all NWFP amendment themes) is broadly designedto improve the consistency and reliability of timber harvest[hellip] that support local job opportunities,businesses, and economies" [ES-5]Information on subsequent pages of the DEIS, however, does not substantiate that this "need" exists. Thefollow-up to Table 3-21. Estimated annual employment and labor income by program area, 2021, the DEISstates: "these jobs are not distributed evenly across the region and may be important to smaller, ruralcommunities that have less diverse economies and fewer economic opportunities than communities withlarger populations." [3-110] This statement boldly demonstrates that the USFS does not know if there areany jobs linked with timber production on NWFP lands that are important to smaller, rural communities.Instead, it speculates that jobs associated with timber production on NWFP lands "may be important" tosome communities. [Bold emphasis added to highlight the speculative foundation of this element of theDEIS.] The DEIS does not identify these communities. It does not define the criteria and procedures theForest Service would use to identify them if the NWFPA were implemented. It does not demonstrate that anincrease in predictable timber production from these lands will have a positive impact on jobs for residentsof such communities, if there are any. It does not show that an increase in predictable timber productionfrom these lands will have a positive impact on the economies and sustainability of such communities, ifthere are any.On the same page, the DEIS reinforces the conclusion that speculation is the basis for asserting that thereis a "need" for increasing the predictable timber supply. The section, 3.8.1.4 National Forest RegionalEconomic Contributions states: "national forest management alone cannot ensure community stability.Market conditions and changes outside the control of forest management influence employment in theforest products, agricultural, and recreation industries (Charnley et al. 2018a, Grinspoon, in press).20" [3-110] This statement demonstrates that the USFS knows an increase in predicted timber production fromNWFP lands might not produce the desired outcome: "economic opportunities to support the long-termsustainability of communities located proximate to National Forest System lands and economicallyconnected to forest resources." Moreover, it disregards extensive evidence, discussed above, that showsan increase in predictable timber supply from these lands likely will have large, negative socioeconomicimpacts on economic opportunities and on the long-term sustainability of communities proximate to NWFPlands.In section 3.8 Issue 7 - Sustainability of Regional Communities, the DEIS adds inaccurate and misleadingcontext for the agency's attempt to connect timber production with sustainable communities, using thisstatement:"The Notice of Intent published for the NWFP amendment stated that development and implementationof the NWFP has had significant socioeconomic, cultural, workforce, and financial impacts oncommunities and publics. The NWFP has largely not achieved its timber production goals, which werethe NWFP's primary criteria for supporting economies and community wellbeing." [3-99]This statement suggests that, because it "has largely not achieved its timber production goals" the NWFPhas not supported "economies and community wellbeing." In making this statement, however, the USFSdisregards the evidence described above, which shows that, by not achieving its timber production goalsand leaving lands unlogged, the NWFP probably strengthened the economic sustainability of manycommunities and improved the economic well-being of their residents. It also fails to recognize that theDEIS, itself, presents additional evidence of the likelihood that levels of

logging on NWFP lands do notdirectly contribute to economic sustainability and well-being. This evidence comes from reports ofinterviews with community members: "Most interviewees, regardless of their role in community life, notedhow the complexity of social and economic change factors and their interaction with changes in federalforest management made it nearly impossible to attribute changes specifically to the NWFP instead of tolarger state, regional, and national trends (Adams and Grinspoon, in press." [3-109] In other words,residents of rural communities recognize that other factors, rather than the supply of timber from federallands, determine the economic wellbeing and sustainability those communities. This recognition highlightsthe likelihood that an increase in predicted timber supply might have little, or even no "significantsocioeconomic, cultural, workforce, and financial impacts on communities and publics."Invalid Alternatives. These deficiencies similarly apply to and erode confidence in the definition andevaluation of alternatives. The DEIS states, "Overall plan direction under Alternative B (across all NWFPamendment themes) is broadly designed to improve the consistency and reliability of timber harvest[hellip] thatsupport local job opportunities, businesses, and economies." [ES-5] The discussion above, however, showsit is speculative, at best, for the DEIS to contend that improving "the consistency and reliability of timberharvest" will provide any meaningful positive "support local job opportunities, businesses, and economies."As a result, the definition and analysis of DEIS alternatives with different levels of predictable timber supplyis an exercise in speculating about differences in levels of speculation. These profound conceptual andempirical deficiencies leave Section 3.8 Issue 7 - Sustainability of Regional Communities [3-99 - 3-155]with no substance, no merit.III. ConclusionIn sum, the DEIS fails to provide a comprehensive, assessment of the socioeconomic impacts from thoseelements of the NWFPA that call for increases in predictable timber supply. Instead, it converts speculationinto assertion. The DEIS sets aside evidence and common sense to dismiss the likelihood that industry willpersist with its decades-long effort to eliminate labor costs and, instead, asserts that the jobs and incomesper log will remain constant forever. In the process, the DEIS ignores a vast body of research and data thatshows increased timber production probably would yield:[bull] No net increase in jobs.[bull] Substantial reduction in jobs resulting from the adverse impacts of timber production on othersectors of local and regional economies.[bull] Large net costs to taxpayers.[bull] Even larger overall costs for communities, the region, and society as a whole.

1 Whitelaw, E., ed. 2003. A Letter from Economists to President Bush and the Governors of Eleven Western States Regarding the Economic Importance of the West[rsquo]s Natural Resources.

2 Whitelaw, E., ed. 2011. Letter to President Barack Obama.

3 Chen, Yong, David J. Lewis, and Bruce Weber. 2016. Conservation Land Amenities and Regional Economies: A Post-matching Difference-indifference Analysis of the Northwest Forest Plan. Journal of Regional Science.

4 Haynes, R.W., N.A. Bolon, and D.T. Hormachea. 1992. The Economic Impact on the Forest Sector of Critical Habitat Delineation for Salmon in the Columbia and Snake River Basin. U.S. Department of Agriculture, Forest Service, Pacific Northwest Research Station. General Technical Report. PNW- GTR-307. November.

5 Forest Ecosystem Management Assessment Team (FEMAT). 1993. Forest Ecosystem Management: An Ecological, Economic, and Social Assessment. This report also reports the average recreation value per acre of lands with different characteristics. It shows, for example, a value of about $100 (converted to 2013 dollars) for [ldquo]semiprimitive[rdquo] and [ldquo]natural roaded[rdquo] lands. It does not, however, explain why the average value per acre is less than the average value per acre per year. The following discussion relies on the per-year numbers, as they appear to reflect more closely the underlying data on the recreational consumer surplus per person per day of activity.

6 Rasker, R., Gude P.H., and Delorey, M., 2013. The Effect of Protected Federal Lands on Economic Prosperity in the Non-Metropolitan West.

7 Hjerpe, E., A. Hussain, and T. Holmes. 2020. Amenity Migration and Public Lands: Rise of the Protected Areas.

8 Prestemon, Jeffrey P., and Thomas P. Holmes. 2008. [ldquo]Timber Salvage Economics.[rdquo] T.P. Holmes, et al. (eds) The Economics of Forest Disturbances: Wildfires, Storms, and Invasive Species.

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