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Comments: Thank you for the opportunity to comment on the 2025 revision to the NWFP. Please

choose Alternative C as the responsible, ecological, most efficient, cost effective and

most prudent decision to stay consistent with the intentions of the Purpose and Need.

Forest management is complex and requires thorough evaluation. Too much

simplification will lead to significant problems.

Your analysis was thorough with a few exceptions. Alternatives.

The document states "to the greatest extent practicable" in one (or more) situations. That

language is too vague and ambiguous. Define the constraints where that would be applied

and provide specific parameters to consistently guide the decision maker. My experience

trying to follow such ambiguous language is it is meaningless and allows decision maker to

do what they want. Delete the wording and replace with defined guidance.

The Plan states that the original NWFP "may affect" many listed species and ?critical

habitat. I believe the USFWS consultation found the Plan"may ADVERSELY affect" those

species.

The mention of "ecological services" in Alt B (and elsewhere) mentions forest benefits to

humans in terms of jobs/wood products etc, but neglects to mention the essential

contributions of Forest organisms that provide ecosystem services such as pollination,

disease control, soil fertility. Etc. <https://www.climatehubs.usda.gov/ecosystem-services>

The correct definition changes your analysis of the alternatives that claim ecological

services. USDA uses these terms interchangeably.

The encouragement of natural ecological contributions from beavers is laudable, as is

incorporating Indigenous knowledge that is based on successful sustainability of historical

practice.

It is important to add under Affected Environment of Alt A (and all Alternatives) that habitat for northern spotted owls and other old-growth dependent species was severely depleted when the NWFP was developed. Approximately 10% of old growth remained at that time, compared to historical pre-settlement levels. That decrease was largely due to timber harvest. All alternatives addressed in this revision starts with that important perspective. The Plan should also mention that much of the Affected Area was never glaciated. The result is an ecosystem unlike anywhere else in the world. The large number of diverse organisms reflect that geological history and highlights another important reason to maintain those irreplaceable areas.

Alt C retains most trees over 80 years of age. This is important. Other alternatives suggest harvest up to 120 years would allow for development of old growth characteristics over time. That 40 year difference in of predicted "recovery time" would be severe to the remaining old-growth dependent species which are struggling to persevere with the existing amount of older trees. Further, with climate change, trying to develop old growth characteristics with higher temperatures, changing phenological windows and modified precipitation patterns is not guaranteed.

Timber harvest and wood products and jobs are certainly important to local and national communities. These industries benefitted in liberal and ecologically unsustainable harvest practices for over 50 years. The Plan provides for some continued sustainable harvest under all alternatives, and that is great. However, wood products were the prominent factor leading to the listing of so many old growth species, and the potential extirpation of some of them from the face of the earth. I see no justification that any federal or private forest should have the right to annihilate a species from the earth for profit, especially after years of lucrative profits. It is important to also stress your data that many of these mills that could handle old growth logs have been removed and are unlikely to return.

I appreciate your mention of the decreased size of the federal workforce that are responsible for implementing the Plan under any alternative. You can't provide full analysis without incorporating recent large-scale firing of federal employees and proposed massive cuts to the USFS, BLM and the USFWS, and how the smaller workforce may make predictions in any of the alternatives unfeasible. You should also disclose the high proportion of green card immigrant workers that support tree planting, fire-fighting, preventative fire treatments, weed control and other work that the agencies have had difficulty getting US citizens to do. Recent Administrative actions have severely cut work visas and other immigrant working rights. According to PEW Research, immigrants accounted first about a quarter of workers (27%) in the agriculture, forestry, fishing and hunting sectors in 2022. Some of them were undocumented. It is unlikely that US citizens could fill that job gap to implement the Plan. Further, it is important to also stress that many of the mills that could handle old growth logs have been removed and are unlikely to return.

Wildfire is a significant concern. Your analysis failed to mention that most of these forests are in fire-dependent ecosystems, that many of the trees and organisms have successfully adapted to fire over 420 million years of years, indigenous burning reduced catastrophic wildfires for decades and have been reduced recently, that invasive annual grasses and other fire-spread weeds such as Scotchbroom, gorse, and English ivy accelerate and spread following both prescribed and wild fires), that preventative fire treatments can increase soil disturbance, road access, and increase highly combustible weeds, and that 75-90 percent of wildfires are caused by humans.

Prescribed fire, fire prevention treatments and harvest all require increased access where those treatments occur, yet you chose to deny road/access analysis. Increased access compared to Alt A could further dissect intact forest habitat, increase disturbance to

species sensitive to noise, ground disturbance and increased openings for predators.

Road and treatment access and the associated vehicles/human presence also increases the chance of ignition, spread of weeds, many of which increase fire ignition and provides opportunities for increased High risk human activity that could increase chances of wildfire. Road/access should be analyzed for each alternative, at least at a programmatic level.

Most of the affected environment is within a fire ecosystem. Organisms In these ecosystems have evolved over thousands of years to successfully adapt to wildfire.

Historically, wildfires were patchy and occurred outside breeding periods. Large wildfires often had adequate adjacent habitat or escape pathways to allow organisms to survive fire. Logging, vegetative conversions and human development have significantly changed the pre-development landscape that supported these organisms for hundreds of years.

Recent catastrophic fires have also changed many of those survival scenarios. Fire prevention treatments can alter or remove safety habitats, and most prescribed fires occur during sensitive reproductive times for organisms. The increased impacts on organisms resulting from fire prevention treatments should be more thoroughly analyzed and compared in all Alternatives. The Plan should also address how each Alternative affects the latest State of the Birds (March 2025) which documents an 11% decline in forest bird populations in the last 50 years.

Human settlement and private roads, homes, fences, grazing, agriculture has increased significantly in and adjacent to forest habitats in the Pacific NW. Since most wildfires are started by human activity, the actions of people in these areas should be analyzed and actions incorporated in the Plan, especially in O&C checkerboard ownership and WUIs.

Landowners who practice fire safe property management, control of fire-responsive invasive weeds, sustainable grazing, fire safe building practice, avoid cedar roofs and maintain fire safe boundaries between their buildings and forest vegetation should be

rewarded with incorporation into government fire prevention cooperatives at minimal cost.

Likewise, those who follow risky property management practices that lead to wildfire should equivalently be charged to pay to control fires caused by their risky practices.

Many of the factors to consider for Alt B Treatments should also be included in Alt C .

Incorporating landscape, historical conditions (Including how much old growth remained when the NWFP was developed), soil conditions, regeneration predictions and conditions, scientific response to treatment, historical hardwood presence, stand density are all factors that would guide prudent site management under ANY of the alternatives, particularly Alt C. Please incorporate these decision factors into Alt C.

Survey and Manage practices are challenging and frustrating, both to project proponents and people like me who had to divert scarce funds and personnel to sometimes inefficient and costly work at the expense of other high priorities. The work on those previously ignored organisms has led to incredible knowledge about ecosystem complexity and function. Our scarcity of information and conservation practices on the more obscure organisms has contributed to the dire report that world biodiversity has decreased by 70 % over the last 50 years. One in 4 breeding birds (3 million) have been lost since 1970's. This decrease in biodiversity is probably under-estimated since we have such limited population/trend data on many of these species. The Plan should address this data and apply another reason to select Alt C.

ATTACHMENT-CITATIONS; supporting research re NWFP ommments.pdf; Supporting document links

<https://research.newamericaneconomy.org/report/immigration-and-agriculture/>

<https://www.stateofthebirds.org/2025/>

[https://www.worldwildlife.org/press-releases/catastrophic-73-decline-in-the-average-size-of-global-wildlife-populations-in-just-50-years-reveals-a-system-in-peril#:~:text=Washington, DC \(October 9,,WWF\) Living Planet Report 2024](https://www.worldwildlife.org/press-releases/catastrophic-73-decline-in-the-average-size-of-global-wildlife-populations-in-just-50-years-reveals-a-system-in-peril#:~:text=Washington, DC (October 9,,WWF) Living Planet Report 2024)

<https://www.weforum.org/stories/2022/10/nature-loss-biodiversity-wwf/>