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Organization:

Title:

Comments: NW Forest Plan (NWFP) Proposed Action Alternatives (B, C, and D) Comments.

I am a lifelong Oregonian and have a M.S.L in Environmental and Natural Resource Law from Lewis & Clark Law School. I oppose the proposed action alternatives (B, C, and D) to the Northwest Forest Plan (NWFP), which significantly weaken protections for mature and old-growth forests, resulting in direct harm to my property, community, and livelihood.

Direct Impact to the Salmon River Estuary & Watershed: (See attachment)

I own and manage property within the Cascade Head Scenic-Research Area (CHSRA). The Cascade Head Scenic Research Area Act, Public Law 93-535, established Cascade Head as the first Scenic Research Area designated in the US, "to provide present and future generations with the use and enjoyment of certain ocean headlands, rivers, streams, estuaries and forested areas, to ensure the protection, the study of a significant areas for research and scientific purposes and to promote a more sensitive relationship between people and their adjacent environment." The Cascade Head Experimental Forest and Scenic-Research Area are a United Nations Biosphere Reserve (CHBR), and the Salmon River Estuary is a Key Watershed.

1. Impacts to the Siuslaw National Forest from proposed action alternatives (B, C, and D) represent a clear and quantifiable injury to my property. They reduce the ecological, aesthetic and economic value of my property, including loss of biodiversity and disruption of endangered species habitat (e.g., spotted owl, marbled murrelet, coho salmon). Loss of property value constitutes economic harm.

2. I manage my property in accordance with the Management Plan, USDA guidelines, and in alignment with CHSRA and UNESCO. The proposed action alternatives (B, C, and D) undermine long standing collaborative conservation efforts between private owners, organizations, and the Forest Service.

3. Crowley Creek has undergone significant and expensive restoration to restore its natural channel and native vegetation. A decline in water quality from logging in the Crowley Creek watershed impacts my water rights, as my tank draws water directly from the creek. One-third of the watershed is private, while two-thirds are owned by the Forest Service.

4. The agency must consider the cumulative impact of existing private and commercial thinning activities, as

these watersheds directly affect our drinking water, families, and recreational areas. A 2023 NASA report on logging in Oregon's coastal drinking watersheds reveals that one-third of forests in 80 drinking watersheds have been logged in the past 20 years, posing a risk to surface water quality (See attachment). Conventional logging practices lead to contamination of drinking water. The report identifies several impacted communities at greater risk from the proposed action alternatives (B, C, and D). According to the Oregon Department of Environmental Quality, over 80% of Oregonians rely on surface water for drinking, including most coastal residents. Additionally, young trees planted to replace mature ones require herbicide and pesticide spraying and consume more water, further depleting water supplies.

5. The upstream impacts from the proposed action alternatives (B, C, and D) raise serious Endangered Species Act (ESA) concerns and pose a direct threat to ESA-listed species. The Salmon River Estuary, one of the last undeveloped regions on the Oregon Coast, is critical habitat for listed species such as the spotted owl, marbled murrelet, coho salmon, and the Oregon silver spot butterfly. A decline of coho salmon would harm the broader ecosystem, local fisheries, recreational anglers (including myself), and tribal rights. The Bolt Decision granted tribes legally protected rights to harvest fish in traditional territories, and the right for there to be fish to harvest.

6. As someone who conducts property surveys for the ESA-listed Pacific Marten Coastal DPS, I have a direct interest in the species and its habitat. Because the arboreal marten cannot traverse clear-cut areas logging (including salvage-logging) fragments habitats, isolates populations, and reduces genetic diversity. The development of additional logging roads further exacerbates habitat fragmentation, putting species at greater risk.

7. Changes to the NWFP that result in unsustainable timber harvest and reduced protections for ESA species violate the National Forest Management Act (NFMA), which mandates the preservation of long term ecological sustainability. They also violate the Public Trust Doctrine, which require the preservation of critical habitats and ecosystems for future generations. The Forest Service should not set fixed thresholds for forest management. Watersheds are complex, and forestry impacts unpredictable and varied. Oregon has already lost much of its tidal wetlands to development, and remaining habitat and ecosystem services are substantially degraded by upstream logging.

Direct Impact to Oregon Coastal Communities and Recreation:??

As a resident of the Oregon Coast, in a county identified as having extremely high 'social vulnerability,' I am deeply concerned about the long-term economic and social impacts of proposed action alternatives (B, C, and D). Having grown up in old timber towns, we must move away from the zero-sum game of extractive logging. The future of our rural economy is better served through ecotourism and the development of sustainable industries. It's time to shift the framework and embrace long-term solutions.

1. Given that wildfire risk is cited as justification for making changes to the NWFP, I urge the Forest Service to

conduct a thorough NEPA review on its fire program and to prioritize non-extractive approaches to wildfire resilience. Emphasize should be on proven measures to safeguard structures including resilience materials and feathering vegetation to 100ft. Mature and old-growth forest must be preserved to maintain biodiversity and sequester CO2. Public trust resources are essential for climate resilience. It is legally reckless to amend the NWFP amid ongoing controversy over wildfire forest decisions at the county and state levels. If realized the proposed action alternatives may violate the Clean Water Act (CWA), Clean Air Act (CAA), ESA, and National Forest regulations.

2. It is vital to have Tribal inclusion, which all action alternatives incorporated to varied degrees. However, this inclusion must be approached with genuine intent and through a dedicated amendment focused solely on tribal participation, rather than packaged with environmental deregulation and increased Mature and old-growth timber harvest.

3. As a photographer and photojournalist, I spend extensive time in National Forests, including Siuslaw, Rogue-River Siskiyou, and the Elk River Watershed. I fish, hike, trail run, observe species, and spent fifty nights camping on public land last year. My background in the professional ski industry involved hundreds of days in Mt. Hood, Mt. Baker-Snoqualmie, Deschutes, Willamette, and Wallowa-Whitman. The degradation of National Forest ecosystems-habitat destruction, water contamination, and diminished biodiversity-directly impedes my ability to continue these activities, violating my legal interests in preserving access to these lands for recreational and conservation.

Upholding the Integrity of the NWFP:??

Any amendment to the NWFP must prioritize environmental preservation and uphold the Public Trust Doctrine. The Forest Service should reject the proposed action alternatives (B, C, and D) because they fail to preserve current protections, ensure robust tribal involvement, or safeguard mature and old-growth climate resilient forests. They grant excessive agency discretion, jeopardizing my property, community, and public trust. Instead the Roadless Rule should become a model to protect ecological integrity, community resilience, and guide more balanced management moving forward.

Thank you for your consideration,??

Jana Rogers?

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March 14, 2025

ATTACHMENT-REFERENCE: 2023Sum_MA_OregonCoastRangeEco_TechPaper_FD_v3.pdf; NASA DEVELOP National Program Massachusetts [ndash] Boston Summer 2023 Oregon Coast Range Ecological Conservation Mapping Recent Logging within Drinking Watersheds of Oregon[rsquo]s Coastal Range to Support Future Resource Management Policies Technical Report August 11th, 2023 Emily French (Project Lead) Uma Edulbheham Sarah Hughes Madison Arndt Advisors: Dr. C[eaacute]dric Fichot, Boston University (Science Advisor) Joseph Spruce, Science Systems and Applications, Inc. (Science Advisor) Fellow: Tyler Pantle (Massachusetts [ndash] Boston)

ATTACHMENT-Figure/Picture: fsbdev7_007112.pdf; Map of Cascade Head Scenic Research Area with landuse/landcover