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Comments: 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: Comments - Northwest Forest Plan Amendment Draft Environmental Impact Statement (DEIS)

Dear Regional Forester Jacque Buchanan and Regional Forester Jennifer Eberlien,

On behalf of the Sisters Trails Alliance (STA), we thank you for the opportunity to comment on the Northwest Forest Plan Amendment (NWFP) DEIS. STA's mission is to enhance outdoor recreation and connect communities through stewardship of Sisters Country trails, many of which are located within the NWFP area in the Deschutes National Forest. STA represents tens of thousands of locals and visitors who recreate on the nearly 200 miles of trails that STA stewards.

While we understand and support the need to protect communities from the impacts of wildfires and make meaningful commitments to honor Tribal sovereignty, treaty rights and to facilitate co-stewardship, we are concerned about certain elements of the proposed alternatives that would significantly increase timber harvests and logging on our public forest lands. The DEIS does not consider the impacts increasing timber harvest will have on outdoor recreation opportunities in the region and the local economies that depend on recreation and tourism.

Public lands are the lifeblood of our community. People move to the Sisters because of the unparalleled access to outdoor recreation on our federal public forest lands. In addition to outdoor recreation and all the physical, mental, societal, and economic benefits it provides, our forests also supply several other key benefits to our local community, including clean air and water, fish and wildlife habitat, and climate mitigation. Given all the public values, we believe that public lands should be managed for the benefit of the public, not private interests.

We respectfully ask the Forest Service to consider the following in the Final Environmental Impact Statement and any resulting decision.

Supporting Tribal Sovereignty and Environmental Justice

The NWFP encompasses lands occupied and stewarded by dozens of tribes and indigenous people for thousands of years. No matter the outcome and final decision of the NWFP amendment process, the Forest Service must uphold its obligation to respect Tribal sovereignty, honor treaty rights, and genuinely consult with Tribes during decision-making processes. Any changes to the Northwest Forest Plan should support Tribal access to harvest first foods, accommodate cultural burning practices, and promote the use of co-stewardship

agreements.

To address environmental justice concerns, the Forest Service should conduct a comprehensive analysis at the landscape level of any proposed management changes, including assessment of impacts to air quality, water quality and quantity, climate, recreation, and cultural use. To support and protect workers, the Forest Service should ensure safe, sustainable, and equitable working conditions and fair compensation for any forest management work.

Incorporating Traditional Ecological Knowledge, facilitating Tribal involvement, and addressing environmental justice concerns in the management of our national forests, however, does not require weakening the core conservation protections of the original Northwest Forest Plan.

We support the Forest Service moving forward with strong Tribal inclusion and environmental justice components.

Economic benefits of Deschutes NF recreation and tourism

The Forest Service should consider the economic benefits of outdoor recreation for the region and the potential impacts the amendments could have on this treasured resource. The DEIS focuses on timber harvest as the main economic activity to promote in local communities, but outdoor recreation and public lands-based tourism is also a major economic contributor that should be considered, especially in Sisters and Central Oregon.

While we recognize the agency's goal of supporting communities with timber production, it is important to recognize that national forests provide a host of resources beyond timber volume, including a thriving outdoor recreation industry worth tens of billions of dollars. According to the Oregon Statewide Comprehensive Outdoor Recreation Plan for 2025-29, in 2023 alone, trail activities generated an estimated \$14.3 billion in economic value and \$945 million in health benefits.

The DEIS even states that "Recreation was the largest contributor to the regional economy" (p. 3-151). Table 3-24 (p. 3-135) displays 2019 outdoor recreation visitor spending and employment in the NWFP socioeconomic region counties in Oregon and Washington, showing that Deschutes County accounted for \$744,279 in trip-related spending and 9,424 jobs. Further, these figures only take into account spending in 2019. As you know, these numbers have increased significantly post the COVID-19 pandemic, especially in Deschutes County. These figures should be updated based on current data, including the Oregon Statewide Comprehensive Outdoor Recreation Plan for 2025-29 and the current figures should be considered in the analysis.

When considering the economic benefits and impacts, recreation and tourism should be considered at least equally to the timber economy. Increasing timber harvest levels under Alternatives B, C, and D may promote more jobs and economic activity in the timber industry, but it may also conflict with jobs and economic activity in the local recreation and tourism sector, which, in our area of the Northwest, depends on the beauty and accessibility of our forests, public lands, trails. Further, timber cutting is inherently an extractive industry. Trees, especially in the dry forests of central Oregon, take a long time to mature and once cut, there's not much timber work for a generation or more. In contrast, recreation provides benefits year in and year out, and these benefits are very likely to grow over time, especially if forests are maintained for recreation and biodiversity rather than lumber.

Potential negative impacts to recreation that are not considered in the DEIS include trail and area closures from logging activities, increased soil erosion and sedimentation on trails and rivers, soil drying from reduced canopy cover, and impacts to the visual aesthetics of the forest and the quality of recreational experiences.

Public lands are meant to be managed for multiple uses that benefit the greater good, not just for certain private

economic interests. We encourage you to carefully assess the economic and social benefits of recreation on public forest lands and how the proposed alternatives may impact those.

Loss of mature and old growth trees from increased timber harvest levels

In addition to the negative impact on recreation and tourism, we have concerns about how the proposed increases in timber harvest under alternatives B, C, and D could negatively impact the outdoor recreational experience for STA trail users, local wildlife and biodiversity, and our region's resilience to climate change.

We are particularly concerned about, and would like more information on the rationale behind, increasing tree age harvest limits from 80 years old to 120 years in moist forests and 150 years in dry forests. Most of STA's trails fall within "dry forest" areas and these are the areas that stand to see the highest increases in timber harvest. There does not seem to be any scientific rationale in the DEIS behind this proposal to increase the age of trees allowed for harvest. Without a scientific, evidence-based rationale, it would be easy for any observer to conclude that this is no more than a disguised attempt to increase the number and size/age of trees that can be cut.

It is especially important now, more than ever, to provide the strongest protections for old and large trees as they have become increasingly rare across the landscape. Every Watershed Analysis done on the Sisters Ranger District since 1996 notes the same trend: trees over 21" Diameter at breast height (dbh) are now rare on the landscape as compared to historic conditions including Historic Range of Variability (HRV). There is little scientific justification for increasing the harvest of larger trees or the next generation of old growth.

Key aspects of the quality of life and recreation in the Sisters area are the beautiful forest and views of clear rivers and mountains in the distance. This includes the remaining large, mature ponderosa pine trees that line our hundreds of miles of trails. These large trees are also more fire-resistant, store more carbon, provide more shade and shelter, and provide more vital wildlife habitat for threatened and endangered species. Large, old trees must be retained and recruited to maintain and enhance the quality of life and recreation in this area, as well as to protect the health and resilience of the forest itself.

Where thinning and logging activities do occur, they should be focused on small-diameter trees in unnaturally dense stands and in parts of the forest that are near structures and communities.

If some larger trees must be removed for safety or ecological reasons, we ask that the Forest Service clearly define which trees will be cut and the reasons for cutting each one. This includes flagging the trees, showing them to the public via field trips, and communicating the rationale for removal. These should be rare exceptions and, thus, should not be too onerous on the agency. It will also help build trust in restoration theory and practice with the public. We also ask that the Forest Service develops specific criteria for when these larger trees (over 21" dbh) in dry forests should be removed.

Wildfire risk and community safety

Although we have concerns about the increased timber harvest and the potential impacts on Sisters Country trails and its users, we understand the need to mitigate fire risk and enhance community safety. Wildfire is a natural, important piece of a healthy forest, especially the dry Ponderosa pine-dominated forests in Central Oregon that historically experienced frequent fire return intervals. However, high-intensity fire near communities can threaten homes, structures, lives and the outdoor experience (smoke, trail/area closures, etc).

Management of our national forests over the last century have focused on fire suppression, fire exclusion, and

clearcutting, which have significantly altered forests and degraded ecosystems that are adapted to frequent fire. To address the threat of wildfire, agencies are now planning to increase more logging across national forests, including in the NWFP amendments. Logging mature and old-growth trees, though, is counter-productive to protecting communities and restoring fire to the landscape. These trees are the most fire-resilient, and a focus on logging them takes resources away from proven community protection strategies such as creating defensible space and emergency preparedness.

For its wildfire strategy, the agency should prioritize protecting communities over commercial logging, and establish the strongest possible protections for mature and old-growth trees. Unless forest management efforts are coupled with serious efforts in communities to harden structures, nearby wildland fires can easily become urban fires. Fire risk reduction efforts should instead prioritize home hardening, defensible space, community preparedness and prescribed and cultural burning first, with a secondary focus on thinning and logging. Further, any fuels reduction activities should also be focused on small-diameter trees in unnaturally dense stands and near structures and communities first, while mature and old growth trees should be protected and recruited in order to restore fire-resistant and resilient forests.

Coordinating with STA on forest and trail projects

Lastly, we ask that the Forest Service closely coordinate with STA and other relevant community and outdoor recreation organizations on any future forest projects that may have an impact on Sisters Country trails and users of those trails. Particularly, we hope to coordinate with the agency on local thinning and burning projects that may temporarily close trails, create a health and safety concern for recreationists, or degrade the quality of the trail experience.

The Forest Service has been our close partner for many years and we look forward to continuing and strengthening that relationship into the future. We are definitely concerned about how the recent cuts to Forest Service staff and funding will impact the health of our forests, public lands, and trails. As the broad threats to public lands increase, we believe it is imperative that we do everything we can to protect the essential values that public lands provide to all of us. STA stands ready to do all we can to support the recreational mandate of the Forest Service in this moment of reduced staff and budget.

The NWFP amendments provide an opportunity to modernize forest stewardship by honoring Indigenous Knowledge and traditional stewardship practices, protecting and recruiting mature and old growth forests that have been lost to unsustainable logging, and supporting local communities and economies that depend on forests and public lands. We appreciate the opportunity to comment on the DEIS and hope to see a plan move forward that adequately considers the many values of public lands and forests.

Sincerely,

Stephanie Presley
Executive Director