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Organization: Trinity River Lumber Company

Title: Forester

Comments: I am writing on behalf of Trinity River Lumber Company, a locally owned and operated sawmill based in Trinity County, California. We appreciate the opportunity to comment on the Draft Environmental Impact Statement (EIS) for the proposed amendment to the Northwest Forest Plan. As the largest private employer in Trinity County, we strongly support Alternative B of the proposed amendment.

Timber production has been a cornerstone of Trinity County[rsquo]s rural economy for decades, providing jobs, supporting local businesses, and sustaining local communities. Historically, the Forest Service has played a critical role in managing public lands to supply timber products in a manner that supports these communities. However, the current forest management framework under the Northwest Forest Plan (NWFP) has contributed to an economic decline in rural areas such as ours. According to recent economic data, Trinity County continues to experience high levels of poverty, with over 20% of its residents living below the poverty line, much higher than the state average. One of the primary reasons for this is the sharp reduction in the amount of timber available for sustainable harvest, resulting in fewer jobs and economic opportunities tied to the forest products industry.

As a key federal resource, the forests of Trinity County must be managed in a way that sustains the livelihoods of residents who directly rely on them. The National Forest Management Act (NFMA) of 1976 mandates that the Forest Service manage national forests to meet the needs of local economies, including the consistent production of timber products. The Multiple-Use Sustained-Yield Act (MUSYA) of 1960 further supports this mandate by requiring that timber production be balanced with other uses and that timber harvests occur in a manner that is sustainable and supports long-term economic stability. Management practices occurring under the 1994 NWFP have heavily favored uses excluding timber harvest, contradictory to these two laws that govern National Forest System lands.

In conclusion, we urge the Forest Service to adopt Alternative B as part of the amendment to the Northwest Forest Plan. By doing so, you will help foster a healthy, sustainable, and economically viable future for Trinity County and its residents. If the preferred alternative is chosen, we ask to amend the exceptions for harvesting trees older than 150-years for all Land Use Allocations within Dry Forests to include restoration of any ecosystem, rather than those that are just unique. Another revision to the proposed alternative that we recommend is maintaining suitable habitat for the northern spotted owl at an amount reflective of a range of historic conditions within the inherent capability of the landscape given expected natural disturbances within all Land Use Allocations of Dry Forests. Fire suppression has led to Dry Forests that are unnaturally overstocked with conifers, such as former oak woodlands, which are currently experiencing higher rates of mortality due to natural disturbance. These forests are considered NSO habitat, and therefore more heavily regulated, even though they will not persist through anticipated natural disturbance and they increase risk of high severity fire to adjacent communities and ecosystems.

We remain committed to working with the Forest Service to ensure that our forests continue to provide valuable resources for generations to come. Thank you for considering our comment.

ATTACHMENT-LETTER TEXT: NWFP Draft EIS comment.docx; This is the same content that is coded in text box; it was originally included as an attachment