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March 17, 2025

Jacque Buchanan

Regional Forester, Pacific Northwest Region USDA Forest Service

333 SW First Avenue, Portland, Oregon 97204

Subject: Comments on the Draft Environmental Impact Statement (DEIS) for the Northwest Forest Plan Amendment

Dear Ms. Buchanan,

I. Introduction

The Northwest Forest Plan (NWFP) Amendment represents a critical opportunity to realign federal forest management with the pressing realities of wildfire resilience, forest health, and economic sustainability. However, the current Draft Environmental Impact Statement (DEIS) fails to meaningfully address these challenges. The proposed amendment largely maintains outdated Land Use Allocations (LUAs) while layering on additional restrictions that reduce opportunities for active management-an approach that is fundamentally misaligned with both ecological science and national policy priorities.

The Forest Service acknowledges in the DEIS that the 1994 NWFP has not functioned as intended, with timber production levels consistently failing to meet projected goals and wildfire severity increasing dramatically across the landscape. Despite these well-documented changes in forest conditions, climate threats, and the increasing risk of catastrophic wildfires, the amendment fails to propose meaningful revisions to LUA boundaries. Instead of taking a data-driven approach that reflects modern wildfire risk modeling and ecological restoration needs, the DEIS simply applies additional constraints to already limited management areas.

Additionally, the recent Executive Order, Immediate Expansion of American Timber Production (March 2025), clearly underscores the national priority of increasing domestic timber production to bolster both economic stability and national security. The Executive Order recognizes the role of federal lands in ensuring a predictable and sustainable wood supply-a directive that this amendment largely ignores. Instead of aligning with this policy shift, the DEIS adds restrictions, does not meaningfully increase timber production, maintains outdated practices,

and lack scientific backing.

II. Overarching ConcernsA. The Need for a True Revision

The Forest Service must comprehensively realign LUA boundaries based on actual forest conditions, wildfire risk, and restoration needs rather than relying on legacy classifications that no longer reflect ecological realities. The DEIS fails to provide a single viable alternative that addresses these fundamental issues.

A No action alternative (Alternative A) simply maintains the status quo-a framework that has failed to meet timber production targets, has contributed to worsening wildfire conditions, and does not reflect current scientific understanding of forest health and resilience.

B. Alternative B, the proposed action, fails to make substantive adjustments to LUAs while imposing new restrictions that further limit timber production and proactive forest management.

C. Alternative C is the most restrictive, prioritizing passive management approaches that

have been linked to higher fuel loads, increased wildfire severity, and reduced forest resilience.

D. Alternative D offers some improvements by increasing flexibility for active management, but it still does not go far enough in revising outdated LUAs or expanding the land base available for sustainable timber harvest.

At minimum, the Forest Service must develop a new alternative that:

- * Adjusts LUA boundaries using modern risk assessment tools and real-time forest condition data.
- * Expands active management across fire-prone landscapes to reduce fuel loads and improve ecological resilience.
- * Ensures a sustainable timber supply that supports rural economies.

The failure to offer such an alternative renders this amendment inadequate in addressing the urgent challenges facing federal forests across the NWFP region.

B. Science-Based Land Use Planning

The DEIS claims that the proposed amendment is intended to "improve wildfire resistance and resilience" and "support adaptation to and mitigation of climate change" (Volume 1, ES-1).

However, the document does not integrate key scientific models and data sets that should be driving decision-making, including:

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* The Pacific Northwest Quantitative Wildfire Risk Assessment, which provides a regionally specific model for prioritizing treatment areas based on fire likelihood, severity, and expected impacts.

* Forest Disturbance and Restoration Needs Models, developed in studies by Hauge et al. (2015), Demeo et al. (2018), and Laughlin et al. (2023), which assess where active management is most needed to restore historical forest structure and function.

* Oregon's 20-Year Landscape Resiliency Plan and Washington's 20-Year Forest Health Strategic Plan, both of which incorporate federal lands and should be guiding this amendment process.

By failing to incorporate these tools, the DEIS does not adequately assess where active management is most urgently needed to restore fire-adapted landscapes and protect communities from catastrophic wildfires.

III. Substantive Concerns

1. Land Use Allocations (LUAs) and Active Forest Management

The NWFP Amendment's approach to LUAs is fundamentally flawed, failing to align land designations with modern science, wildfire risk assessments, and sustainable management objectives.

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1. Moist Matrix

Under the original NWFP, less than 15% of the plan's footprint was designated as suitable for timber production—a stark contrast to the multiple-use mandate of the National Forest System (NFS). These lands, referred to as the Matrix LUA, were expected to support sustainable harvests, yet the timber volumes projected under the NWFP were never met.

Instead of adjusting LUAs to better reflect the current and future needs of forests and communities, the amendment effectively removes 1.3 million acres of Moist Matrix from active timber management by applying new restrictions that functionally transition these lands into Late[shy] Successional Reserve (LSR) status (Appendix AI, p. A 1-17). Through new desired conditions, standards, and guidelines, over half of the existing Moist Matrix LUA will no longer function as an area for sustained timber output.

This reclassification is unacceptable for multiple reasons:

I. It disregards the need for active management in Moist Matrix lands. These areas are not currently functioning as LSRs, nor are they intended to under the original NWFP. However, by prohibiting harvest in forests over 200 years old (Appendix AI, p. A 1-18), the amendment effectively transitions these lands into reserves, significantly reducing the available land base for sustainable timber production.

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1. It increases wildfire risk by restricting necessary thinning and fuels reduction. Moist Matrix forests include a substantial portion of mixed-severity fire landscapes. By limiting management activities, the amendment ensures continued fuel accumulation, increasing the likelihood of catastrophic fires in the very forests it claims to protect.

2. It contradicts the Forest Service's own stated goals of increasing timber production and restoring ecological health. By restricting harvest on 1.3 million acres of Moist Matrix, the amendment directly undermines the objective of providing a predictable supply of timber, as outlined in Volume I (p. 3-49).

To offset this massive reduction in sustainable timber acreage, the Forest Service must explore opportunities to

transition some young stands within the moist LSR system back into the Matrix LUA. This reallocation would help maintain a sufficient timber land base while still protecting critical late-successional habitat.

ActiveManagement

Since the inception of the NWFP, the primary focus of federal timber management has been intermediate thinning treatments. While thinning has a role in forest health and wildfire mitigation, this approach is not sustainable in the long term-particularly in Douglas-fir-dominated forests.

At some point, thinning opportunities will be exhausted, and without a transition to regeneration harvest, sustained-yield forestry will become impossible. The amendment must include clear directives requiring regeneration harvest in the diminished Matrix LUA to ensure long-term sustainability of the federal timber supply.

To compensate for the proposed further restriction of the timber land base, the amendment must explicitly identify timber production as the primary management focus on Young Moist Matrix stands and ensure that this land base is actively managed for long-term sustainable yields.

Without these revisions, the NWFP Amendment will lock forests into an unsustainable trajectory, where fire-prone landscapes continue to accumulate fuels, and timber-dependent communities lose access to essential resources.

AOL opposes the reclassification of 1 .3 million acres of Moist Matrix as quasi-LSR. This effectively removes these lands from active management, despite their need for restoration.

1. Dry Forest

While the amendment aims to expand active management across Dry Forest LUAs, the proposed desired condition may ultimately limit the ability of these lands to provide a reliable timber supply.

The amendment calls for the presence of large, old trees while eliminating small, young trees in surrounding areas-a directive that, while beneficial for fuel reduction, could impede the natural regeneration and long-term productivity of these forests.

The amendment's approach to Dry Forest maintenance relies heavily on periodic prescribed burning to maintain the "absence of small, young trees." However, if regeneration is consistently suppressed, these forests will eventually become unsustainable as a source of timber products.

The amendment must strike a balance between hazardous fuels reduction and the need for long[shy] term timber regeneration. This means allowing for a mix of tree ages and ensuring that regeneration is actively managed to sustain future timber supply.

1. Adaptive Management Areas

Adaptive Management Areas (AMAs) have long been underutilized and remain that way under the amendment. AMAs were originally intended as flexible management zones for innovation and testing new silvicultural techniques. However, they have largely been treated as additional reserve areas, contributing little to timber production.

The amendment is unclear about how AMAs should be managed moving forward.

To compensate for the effective loss of Matrix lands, the Forest Service should transition AMAs into the Matrix LUA, designating them as areas where timber production is the primary management objective.

1. Riparian Reserves

The amendment should reconsider the second site potential tree height buffer for fish-bearing streams, which in some regions exceeds 400 feet on each side of the stream. This level of protection is excessive and not supported by modern scientific research on riparian microclimates.

When the NWFP was originally developed, these extended buffers were justified based on concerns about maintaining microclimate stability. However, newer research indicates that microclimate effects rarely extend beyond a single tree height.

The Bureau of Land Management (BLM) revised its Resource Management Plans (RMPs) in 2016, reducing riparian buffers to a single tree height for fish-bearing streams, following consultation with the National Marine Fisheries Service (NMFS). The Forest Service should align its riparian management policies with the BLM and NMFS guidance, ensuring that riparian protections are based on the best available science rather than outdated assumptions.

1. Wildfire Resilience and Forest Health Treatment Needs

The current plan does not match the scale or urgency of the wildfire crisis. While the amendment references the need for fuels reduction and resilience measures, its proposed management approach is woefully inadequate given the pace of landscape change.

The DEIS itself acknowledges that high-severity wildfires have erased many of the gains made under the original NWFP (Volume I, ES-1). However, instead of meaningfully expanding active management to reduce future losses, the amendment maintains restrictions that prevent necessary treatments:

- * Thinning and prescribed fire targets remain too low to significantly reduce landscape-scale wildfire risk.

- * For example, Alternative B proposes treating only 65,000-81,000 acres of Young Moist Matrix per decade (Appendix AI, p. A 1-18), which is grossly insufficient considering the millions of acres at risk. Mechanical thinning in combination with

prescribed burning must see targets increased by at least 300% to match the scale of wildfire risk. Current projections are far too low to meaningfully reduce fuel loads.

- * The plan continues to rely on passive management strategies that have failed. Alternative C, in particular, prioritizes "natural processes" over active intervention, despite ample evidence that passive management leads to higher fuel loads and more severe wildfires in fire-adapted landscapes (Volume I, p. 3-18).

- * Commercial thinning is underutilized as a restoration tool. While the DEIS acknowledges that thinning improves resilience, it does not fully leverage commercial harvest as a means of funding and scaling up treatments.

- * The 120-year-old stand limit in Moist LSRs, 150-year-old tree limit in Dry LUAs, and 200-year-old stand limit in Moist Matrix lands should be adjusted to allow science-based prescriptions that enhance forest resilience. The USFS must remove unnecessary restrictions on tree and stand age for thinning treatments as they have no

ecological function. There is ample evidence that well-planned thinning and selective harvest improve overall stand resilience.

The Forest Service must expand the role of commercial timber harvest in restoration. Sustainable harvest operations can fund and facilitate broader fuels reduction efforts, ensuring the workforce and infrastructure remain intact to support long-term forest health initiatives.

Failure to scale up wildfire mitigation will lead to continued loss of old-growth forests, wildlife habitat, and carbon storage—precisely the outcomes the NWFP Amendment claims to prevent.

1. Salvage

It is highly concerning that the amendment prohibits any level of timber salvage in LSRs following natural disasters, particularly wildfire. Salvage harvesting is an essential tool for restoring late[shy] successional forest characteristics after stand-replacing fires.

Dead trees no longer sequester carbon and leaving them to decay only contributes to increased emissions. Utilizing this wood in long-lasting wood products while replanting disturbed areas is the most effective way to mitigate climate change following disturbance.

The prohibition on salvage harvest should be removed, and new directives should prioritize salvage in both LSRs and Matrix lands.

1. Survey & Manage is Ineffective

The Survey & Manage program, originally implemented under the NWFP, was designed to protect rare species associated with old-growth forests by requiring extensive biological surveys before forest management activities could proceed. While the intent behind this policy was conservation-driven, its implementation has led to unintended consequences that undermine the health of the very forests it was meant to protect.

More than two decades of data and on-the-ground experience demonstrate that Survey & Manage is not functioning as an effective conservation tool. Instead, it has become a bureaucratic bottleneck that delays necessary forest restoration projects, restricts active management, and fuels legal gridlock. In doing so, the policy contributes to increased wildfire risk, deteriorating forest health, and reduced timber supply, ultimately harming both the environment and rural communities.

1. Bureaucratic Delays, Not Meaningful Conservation

One of the most glaring problems with Survey and Manage is the sheer scale of paperwork, procedural delays, and litigation risks it introduces into the forest management process. Before a project can proceed, land managers must complete species surveys, often over large project areas and across multiple seasons. These surveys can take several years to complete, even for small-scale thinning or fuel reduction projects.

The list of species covered under Survey & Manage has expanded dramatically since its inception, now covering hundreds of fungi, bryophytes, mollusks, and amphibians—many of which have little scientific evidence supporting their need for strict protections. Even when surveys are completed, newly discovered species populations can trigger additional restrictions, reducing the area available for treatment and forcing managers to restart the process.

The result is paralysis by analysis—a never-ending cycle of surveys and assessments that slows down or cancels projects without actually improving species conservation outcomes.

The Survey & Manage program was originally established to protect over 300 species believed to rely on late-successional forests. However, this justification is now obsolete given the expansive Late-Successional Reserve (LSR) network and the additional 1.3 million acres of Moist Matrix lands that the amendment proposes to manage under LSR-like conditions. In practice, Survey & Manage standards place vast amounts of land "off limits" to active management-especially in fire-prone dry forests.

Case in Point:

The Pechman Exemptions, created in 2006 following a lawsuit against the Forest Service, allowed some thinning projects to move forward without full compliance with Survey & Manage due to excessive delays. The fact that federal courts had to step in to carve out exceptions highlights how dysfunctional the process has become.

1. A Costly and Ineffective Use of Agency Resources

Not only does Survey & Manage not contribute to meaningful conservation outcomes, it also is not a cost-effective use of agency budgets. Instead, it has become a costly bureaucratic hurdle that diverts agency staff and funding away from essential forest restoration, wildfire mitigation, and sustainable timber harvest projects.

The Forest Service is already facing significant budgetary constraints, with wildfire suppression costs consuming an increasing share of available funding. Despite these challenges, the agency continues to allocate substantial resources toward surveying and monitoring hundreds of species rather than investing in forest treatments.

A more efficient approach would be to redirect these funds toward proactive management efforts, such as mechanical thinning, prescribed fire, and reforestation, which have proven benefits for both forest health and species conservation. The Forest Service must prioritize limited agency resources toward efforts that provide measurable ecological and economic benefits, rather than maintaining an outdated, cost-prohibitive program that serves as a roadblock to effective land stewardship.

1. Prevents Urgent Forest Health Treatments

Time-sensitive forest restoration projects are frequently stalled or blocked entirely by Survey & Manage requirements. The delay caused by species surveys means that fire-prone forests often remain untreated for years, accumulating excessive fuel loads and increasing the risk of catastrophic wildfires.

By preventing fuels reduction and thinning projects, Survey & Manage protections are inadvertently increasing wildfire risk, threatening the very species they were meant to protect. The Forest Service must remove the Survey & Manage Standards and Guidelines through this amendment to enable meaningful forest restoration and hazard reduction efforts.

Many of the species protected under Survey & Manage are actually adapted to frequent disturbance regimes-including fire-but are now being used as justification to limit management actions that would maintain or restore these conditions. Even small-scale thinning or salvage logging projects can be delayed indefinitely, allowing insect infestations, disease outbreaks, and post-fire decay to worsen before any intervention can occur.

Real-World Impact:

Following the 2020 wildfires in Oregon, several forest restoration projects were significantly delayed due to Survey & Manage requirements. Burned forests that could have been salvaged and replanted instead sat untouched, increasing erosion, choking waterways with sediment, and preventing reforestation efforts. The process prioritized procedural compliance over actual ecological recovery.

1. Does Not Reflect Modern Conservation Science

When Survey & Manage was first implemented, there was limited knowledge about many of the species it sought to protect. Today, improved data collection and research show that many of these species are more widespread and resilient than originally assumed. New ecological research indicates that many species on the Survey & Manage list are not as dependent on old-growth forests as initially believed. For example, some fungi and bryophytes have been found in younger forests or even managed landscapes.

The approach fails to account for climate change. As temperatures rise and wildfire frequency increases, passively restricting forest management in the name of species protection does not make sense—these species need dynamic, disturbance-driven ecosystems to survive. Instead of prohibiting management based on rigid survey requirements, a more effective approach would be to integrate species protections into adaptive management strategies that allow for forest treatments while mitigating potential impacts.

5. Weaponized in Litigation Environmental groups frequently use Survey & Manage as a litigation tool to delay or block forest management projects, regardless of the actual conservation needs of listed species. The program provides an easy legal avenue to challenge timber sales and fuels reduction projects. If even one species is found in a project area that was not surveyed according to exacting standards, opponents can file lawsuits that halt the project indefinitely. The constant threat of litigation forces land managers to be overly cautious, often canceling or scaling back projects before they can even be challenged to avoid legal battles. The result is a de facto shutdown of responsible forest management, leading to worsening wildfire risks and economic losses for timber-dependent communities.

D. Economic Sustainability and Timber Supply The NWFP Amendment must support the long-term economic stability of rural communities that depend on a predictable and sustainable timber supply. However, the current proposal does not deliver adequate harvest levels, even as demand for domestically sourced wood continues to rise. The proposed changes in desired conditions, standards, and guidelines will reduce sustained yield timber management to just 5% of the NFS lands covered under the NWFP—a drastic and unacceptable reduction. Out of 19.7 million acres of NFS lands within the NWFP, only 1 million acres of Young Moist Matrix would remain dedicated to sustained-yield timber management. The timber volume projections are inadequate. Alternative B proposes 490 MMBF per year—only a marginal increase over the current harvest level of 450 MMBF (Volume 1, p. 3-49). This is far below the original NWFP's target of 805 MMBF per year, which was never met due to overregulation and litigation. Given the urgent need for domestic wood supply, these projections are unacceptable and must be revised upward. Rural communities across Oregon, Washington, and Northern California depend on a strong timber economy to remain viable. However, the Forest Service's inconsistent timber supply and restrictive management policies have contributed to mill closures, job losses, and economic instability.

* Between 1990 and 2021, the number of mills in the western U.S. dropped from 600 to 144. Although production per mill has increased from 35 million board feet to 102 million board feet per year, we have lost 6.312 billion board feet of production over that term in the west¹.

¹ <https://www.qualityinfo.org/-/oregon-s-wood-product-manufacturing-industry-is-still-important-especially-in-rural-areas-1>

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* Between 1870 and 2025, the number of mills operating in Oregon declined by over 100. There have been nearly 10 mill closers in the last 5 years alone.

* Logging employment has fallen by more than 50% since the implementation of the original NWFP in 1994.

* Economic uncertainty has discouraged new investment in value-added wood products such as renewable diesel and natural gas.

This significant reduction in logging and overall forest sector employment has had profound impacts on Oregon's rural communities, leading to economic challenges and a decrease in the skilled workforce necessary for sustainable forest management.

The Forest Service must acknowledge its role in shaping the economic sustainability of timber[shy] dependent communities and take deliberate steps to provide the stability needed for long-term investment in mills, workforce training, and value-added wood production.

IV. Wildfire Suppression

Wildfire is one of the most pressing threats to the forests covered under the Northwest Forest Plan (NWFP). Decades of fire exclusion, passive management policies, and restrictive regulations have allowed hazardous fuels to accumulate across the landscape, resulting in increasingly destructive wildfires. The Draft Environmental Impact Statement (DEIS) acknowledges the severity of this issue, yet the proposed amendment fails to establish an aggressive suppression strategy and instead actually sets goals to encourage wildfire as a management tool during fire season.

If the Forest Service is serious about protecting forests, wildlife habitat, and human communities, it must adopt a policy of full wildfire suppression across all Land Use Allocations (LUAs) during peak fire season.

A. Unplanned Ignitions

One of the most concerning elements of the amendment is its explicit endorsement of and goals for "unplanned ignitions" (wildfires) as a method of achieving desired forest conditions. This policy is reckless and endangers firefighters, communities, and the forest itself. While prescribed fire during non-peak wildfire seasons is a valuable tool for reducing hazardous fuels, allowing wildfires to burn unchecked in fire season is irresponsible, especially given current fuel loads and climate conditions.

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1. Wildfires are becoming more extreme and unpredictable.

Fire behavior has changed significantly over the past several decades due to increased fuel loads and prolonged drought conditions. Fires that may have historically burned at low intensity are now far more likely to escalate into large, high-severity wildfires.

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1. Unplanned ignitions put communities, homes, and critical infrastructure at risk.

Fires left to burn under the pretext of achieving "desired forest conditions" can quickly escape containment,

endangering towns, ranches, and watersheds. Rural communities-many of which are already short on firefighting resources-bear the greatest burden when fires are not aggressively suppressed.

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1. Wildfire damages forest ecosystems and increases carbon emissions.

Unlike controlled burns, which are carefully planned to minimize damage, wildfires frequently burn at high severity, destroying soil structure, killing wildlife, and leading to type conversion of forests into shrublands. Large-scale wildfires emit massive amounts of carbon dioxide, undermining climate change mitigation goals.

The Forest Service must immediately revise the NWFP Amendment to include an explicit policy of full wildfire suppression during fire season.

B. Forest Contracts Are a Critical Wildfire Response Workforce

The Forest Service depends on the logging workforce to provide essential firefighting capacity, yet this reality is entirely absent from the DEIS and the proposed amendment. Logging contractors and other forestry service providers represent one of the largest and most capable firefighting forces available to the agency.

1. Forest Operators Provide Heavy Equipment and Skilled Professionals

Forest contractors supply bulldozers, feller-bunchers, water trucks, and other heavy equipment that is critical for containing wildfires. All Oregon logging crews are already trained in fire suppression techniques and are the first line of defense in many rural areas. Without forest contractors and timber operators, the Forest Service would struggle to build fire lines, create fuel breaks, and control fast-moving wildfires.

Operators already work in remote forested areas and can quickly respond to wildfire incidents[shy] often far faster than federal or state firefighting crews. Unlike seasonal wildfire crews, loggers and other forest contractors are a year-round workforce, meaning they can provide continuity and expertise during peak fire seasons.

Oregon's forest contracting companies are required to train their employees to meet Oregon law, ensuring that a highly skilled workforce is available for emergency response.

1. Fewer Forest Operators Means Fewer Firefighters

As available federal timber harvests have declined under the NWFP, the number of available professional loggers has also decreased, significantly reducing the pool of private-sector contractors available for wildfire suppression. Many timber-producing communities once had robust wildfire response infrastructure, supported by local mills and logging operations. As these industries have been diminished, rural firefighting capacity has also suffered.

If forest operations and active management declines further under this amendment, the Forest Service will lose a key workforce that plays a vital role in fire suppression efforts.

V. Conclusion

The NWFP Amendment, as currently drafted, does not adequately address wildfire risks, forest health crises, or timber supply concerns. Instead of taking bold, science-based action to adjust LUAs and expand active management, it largely maintains the status quo while imposing additional restrictions that further reduce forest resilience.

The Forest Service must withdraw the current amendment and put everything back on the table for a full revision that:

- * Uses real-time forest condition data to drive LUA adjustments.
- * Prioritizes active management over passive "no-touch" approaches.
- * Removes Survey & Manage standards and guidelines.
- * Ensures that timber production goals align with market demand and national directives on domestic wood supply.
- * Integrates workforce development and economic considerations into management decisions to support logging, road building, tree planting, transportation, milling, and value-added wood products industries.
- * Includes an explicit policy of full wildfire suppression during fire season.

Without these revisions, the NWFP Amendment will fail to achieve its stated goals, fail to align with national policy priorities, and fail to provide the resilient, productive forests that rural communities and ecosystems depend on. The NWFP must balance conservation objectives with the need for active management, recognizing that sustainable timber harvest is a tool for achieving both economic and ecological goals. Restricting management only accelerates fuel buildup, increases wildfire risk, and undermines the very ecosystem functions the plan claims to protect.

The Forest Service cannot afford to lose the most skilled, experienced, and well-equipped private[shy] sector workforce available for fire response and forest management. The role of every forest contractor in all the Forest Service's work including wildfire response, fuels mitigation, and active management must be formally recognized in federal forest management planning.

We urge the Forest Service to withdraw the current amendment and revise the Plan using a data[shy] driven, science-backed framework that supports resilient forests, thriving rural economies, and a domestic timber supply that meet local and global demand.

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