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Comments: Please see the attached comment from BRC and the attached comments from our members and supporters.

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USDA Forest Service

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BlueRibbon Coalition (BRC) is writing to provide feedback for the Northwest Forest Plan Amendment. BRC is a national non-profit organization that champions responsible recreation and encourages a strong conservation ethic and individual stewardship. We champion responsible use of public lands and waters for the benefit of all recreationists by educating and empowering our members to secure, protect, and expand shared outdoor recreation access and use by working collaboratively with natural resource managers and other recreationists. Our members use motorized and non-motorized means of recreation, including OHVs, horses, mountain bikes, and hiking to enjoy federally managed lands throughout the United States, including those of the northwest forests. Many of our members and supporters live in these states or travel across the country to visit these states and use motorized vehicles to access USFS managed lands throughout the northwest. BRC members visit these 17 forests for motorized recreation, snowmobiling, sightseeing, photography, rockhounding, hunting, wildlife and nature study, camping, observing cultural resources, and other similar pursuits. BRC members and supporters have concrete, definite, and immediate plans to continue such activities in the future.

General Concerns

The Northwest Forest Plan amendment's Purpose and Need was originally developed under policy directives that have since been rescinded or significantly altered by the current administration. Key executive orders and agency priorities that once guided this amendment have been revoked, creating a fundamental misalignment between the project's objectives and the administration's revised land management goals. Additionally, the federal government has shifted its focus away from expansive conservation-driven policies toward resource development, economic growth, and increased recreational access on public lands. Under NEPA (National Environmental Policy Act), agencies must demonstrate that a project's purpose and need align with existing federal priorities and legal frameworks. Proceeding with the amendment under outdated policy directives not only risks legal challenges but also fails to meet NEPA's requirements for a purpose-driven and well-defined need.

Without a clear, updated justification that reflects current policy objectives, the USFS must halt this process until an updated analysis ensures full compliance with NEPA and aligns with the administration's goals for public land management.

It is important to note, BRC has attempted to communicate these concerns and issues throughout the comment period in which, Mr. Dean Schlichting, the Environmental Coordinator, stopped correspondence.

BRC strongly urges the Forest Service to pause the Northwest Forest Plan amendment process due to significant legal and administrative uncertainties surrounding federal land management policies. Specifically:

- * Rescission of Executive Order 14008: The amendment process was initiated under the guidance of Executive Order 14008, which has since been rescinded. Continuing without updated direction could result in policies misaligned with current federal priorities and expose the USFS to legal challenges.

- * Rescission of Executive Order 14112: Titled "Reforming Federal Funding and Support for Tribal Nations To Better Embrace Our Trust Responsibilities and Promote the Next Era of Tribal Self-Determination," has significant implications for the Northwest Forest Plan (NWFP) amendment process. This executive order, issued on December 6, 2023, aimed to enhance collaboration with Tribal Nations by integrating Indigenous Knowledge into federal planning and management activities, thereby strengthening tribal sovereignty and self-determination. One of the five goals of the proposed NWFP amendment is to incorporate Indigenous Knowledge into planning, project design, and implementation to achieve forest management goals and fulfill the Forest Service's trust responsibilities. With the rescission of Executive Order 14112, the foundational policy supporting this goal has been removed, potentially undermining the framework for meaningful tribal engagement in the NWFP amendment process. This policy shift raises concerns about the legitimacy and effectiveness of the amendment, suggesting a need to pause and reassess the process to ensure it aligns with current federal directives and adequately respects tribal sovereignty.

- * Federal Register Proposal Freeze: The current administration has placed a hold on new proposals affecting logging and the Endangered Species Act (ESA). Moving forward with the amendment while these directives remain uncertain contradicts this policy shift and erodes public trust.

- * Uncertainty in Federal Budget and Operations: Ongoing delays and uncertainties in federal appropriations raise concerns about whether the Forest Service has adequate resources and staffing for meaningful public engagement and proper environmental review.

- * Impacts of Executive Orders on Public Lands: Recent executive orders require federal agencies to review land management practices, which could significantly impact the scope of the Northwest Forest Plan amendments. Proceeding without full clarity risks wasting resources and creating unnecessary conflicts with evolving policies.

Purpose and Need

Under the need section of volume 1 of the EIS the Forest Service identifies five interrelated topic areas for the amendment.

1. Improving wildfire resistance and resilience across the NWFP area
2. Strengthening the capacity of NWFP ecosystems to adapt to the ongoing effects of climate change
3. Improving conservation and recruitment of mature and old-growth forest conditions, ensuring adequate habitat for species dependent upon mature and old-growth ecosystems and supporting regional biodiversity
4. Incorporating Indigenous Knowledge into planning, project design, and implementation to achieve forest management goals and meet the Forest Service's general trust responsibilities
5. Providing a predictable supply of timber and non-timber products and other economic opportunities to support the long-term sustainability of communities located proximate to National Forest System lands and economically connected to forest resources

BRC strongly recommends removing areas 2, 3 and 4. The second area listed is "Strengthening the capacity of NWFP ecosystems to adapt to the ongoing effects of climate change". This is not in line with current objectives and goals of the administration as outlined previously with the rescission of EO 14008. Agencies should not be putting climate change at the forefront of policies and amending 17 national forest plans.

Area 3, "Improving conservation and recruitment of mature and old-growth forest conditions". Conservation measures are aiding in the loss of old growth forests due to catastrophic wildfires. These wildfires are causing more harm to the northern spotted owl and other species than anything else. According to the Background in the

Executive Summary, "In recent years, large, high-severity wildfires have resulted in losses of mature and old-growth forests, eliminating gains achieved during the first 25 years of implementation. Research on climate change and on the effects of past forest and fire management regimes indicates that large wildfires and other disturbances will increase in frequency and extent throughout the area covered by the NWFP."

The USFS primary focus should be wildfire prevention and resilience through areas 1 and 5. Wildfire prevention best occurs through timber harvest and sales, active vegetation treatments, maintenance and creation of roads that act as fire breaks.

The fourth area is, Incorporating indigenous knowledge into planning, project design, and implementation to achieve forest management goals and meet the Forest Service's general trust responsibilities. These topic areas are being analyzed in order to better align with the 1994 Northwest Forest Plan. The 1994 NWFP does not mention indigenous knowledge and therefore this topic area does not need to be included in order to meet 1994 objectives.

BRC supports topic areas 1 and 5: Improving wildfire resistance and resilience across the NWFP area and providing a predictable supply of timber and non-timber products and other economic opportunities to support the long-term sustainability of communities located proximate to National Forest System lands and economically connected to forest resources.

Recreation and Public Access

BRC is concerned that the proposed amendments may result in unnecessary restrictions on recreation access, particularly for motorized users and dispersed campers. The Northwest Forest Plan area is heavily used for outdoor recreation, and any reduction in access should be thoroughly analyzed to ensure that all user groups—including those reliant on motorized access—are accommodated.

The Forest Service should develop an alternative that increases, rather than decreases, recreation access, taking into account:

- * The growing demand for outdoor recreation and the need to ensure a diversity of recreational opportunities.
- * The importance of motorized access for individuals with disabilities, in compliance with Executive Order 13985, which mandates equity considerations in federal land management.
- * The significant economic contributions of recreation-based industries and local businesses that depend on access to public lands.

The USFS must comply with the EXPLORE Act's mandate to expand and enhance outdoor recreation opportunities, including motorized use, rather than restricting access through road and area closures. The Act emphasizes increasing recreational access across federally managed lands, streamlining permitting processes, and improving infrastructure to support diverse recreational uses, including off-highway vehicle (OHV) recreation. Any effort by the USFS to close existing motorized routes or restrict access contradicts the spirit of the EXPLORE Act, which directs federal agencies to facilitate and expand motorized recreation opportunities.

Instead, the Forest Service should focus on maintaining and designating sustainable routes that align with the Act's goals, ensuring public lands remain open and accessible for multiple-use recreation.

Wildfire and Forest Management

BRC strongly opposes any provisions in the Northwest Forest Plan amendment that would increase restrictions on active forest management. The plan should prioritize proactive vegetation management, including mechanical thinning and prescribed burning, to mitigate wildfire risks rather than relying on a passive, "let-it-burn" approach.

- * Alternative approaches to wildfire management should consider the devastating impact of recent fires in the

region and prioritize reducing fuel loads through active management.

- * The plan should recognize that overly restrictive conservation measures can exacerbate wildfire risks, leading to severe ecological and economic damage.

Socioeconomic and Equity Considerations

BRC urges the Forest Service to fully analyze the socioeconomic impacts of the proposed amendments.

Conservation-focused policies that restrict access to public lands have historically led to economic displacement and wealth inequality in rural communities.

- * Restricting access to public lands disproportionately affects lower-income individuals who rely on dispersed camping and affordable outdoor recreation.

- * Conservation-driven land-use restrictions have been shown to increase property values and housing costs, making it more difficult for working-class communities to remain in areas dependent on public land access.

- * The Forest Service should consider research, such as the findings from Billionaire Wilderness by Justin Farrell, which document how conservation policies have been used as a tool for socioeconomic exclusion.

Users with Disabilities

We recommend that the USFS use this planning process to finally begin to reverse its decades-long systematic discrimination against those with mobility impairment-related disabilities. The USFS should be ensuring this plan complies with the Outdoor Americans with Disabilities Act which requires 2.5 miles of accessible routes for every square mile of public federal land.

Travel management policies focused on "minimizing" the environmental impacts of motorized recreation have resulted in a dramatic decrease in motorized recreation opportunities on public lands over the last 20 years which has disproportionately impacted people with disabilities.

Wilderness focused environmental groups with extreme ableist biases have pushed for more and more areas to be closed to motorized recreation and reserved exclusively for hikers, mountain bikers, and other "human powered" and "quiet use" forms of recreation in which many people with disabilities are unable to participate.

Every time motorized routes or areas are closed, people with disabilities that require the use of motorized means to access public lands are barred from those areas forever. There has been little recourse for such people in the past because the Americans With Disabilities Act does not require public land management agencies to consider disproportionate effects on the disabled community, but only requires that they be given access to public lands on equal terms with everyone else. As a result, the USFS has historically failed to give any real consideration to the impacts of motorized route closures on the disabled community when developing travel management plans.

While the ADA focuses only on equality of opportunity, equity inherently focuses on equality of outcome. Any policy that is facially neutral but disproportionately harms a disadvantaged or marginalized group is considered inequitable. The USFS is therefore required by this executive order and others mandating that federal agencies consider "environmental justice" in NEPA proceedings to consider whether any route closures in the Thirtymile travel management plan would disproportionately harm disabled users' ability to access public lands.

Any approach to travel management that presumes the superiority of non-motorized forms of recreation like hiking over motorized recreation, or that justifies closing motorized access on the basis that people can still hike

on those routes, is inherently discriminatory toward people with disabilities. Any large-scale closures of existing routes would unfairly and inequitably deprive people with disabilities of the ability to recreate in the area using the only means available to them. It is imperative that the USFS consider the access needs of disabled users in drafting the alternatives for this travel plan and ensure that people with disabilities who depend on motorized means do not lose access.

Timber Harvest

The Executive Order on Immediate Expansion of American Timber Production (March 1, 2025) directs federal agencies, including the U.S. Forest Service, to prioritize active forest management and increase domestic timber production to support economic growth, wildfire mitigation, and national supply chain resilience. This executive order explicitly mandates that federal land management plans incorporate strategies to streamline timber harvests, reduce regulatory barriers, and maximize sustainable yield on public lands. The Northwest Forest Plan Amendment, as currently proposed, does not align with this directive, as it continues to emphasize restrictive conservation measures that limit active forest management and reduce timber production capacity. Given the executive order's clear policy shift, the USFS must reevaluate the amendment to ensure it integrates expanded timber harvesting objectives, rather than maintaining outdated conservation-focused restrictions that conflict with current federal priorities. Failing to do so would render the amendment inconsistent with national policy and undermine the administration's goals for resource development and wildfire resilience. The USFS should pause the amendment process and revise its approach to fully implement the directives outlined in the 2025 executive order.

We would like to close by saying we support "shared use". As long as overall visitation numbers are appropriate for the affected resources, motorized and non-motorized users can be compatible with one another so long as individual users understand designations and plan their activities accordingly. Indeed, motorized and nonmotorized recreation use often overlap as OHV's often increase accessibility to non-motorized recreational activities such as hiking, camping, equestrian use, etc. We also hold that responsible recreational use of public lands can exist in harmony with ecosystem needs.

BRC would like to be considered an interested public for this project. Information can be sent to the following address and email address:

Ben Burr BlueRibbon Coalition

Sincerely,

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Executive Director

BlueRibbon Coalition

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Policy Director

ATTACHMENT-Letter text: Northwest Forest Plan Amendment.docx.pdf; this is the same content that is coded in text box; it was originally included as an attachment

Attachment northwest-forest-plan-amendment-comments-2025-03-18.pdf includes copies of the letter text above, 979 names/signors and contact information as well as the following Form Plus text.

I do not Support the NW Forest Plan AmendmentI enjoy accessing public lands for outdoor recreation. I believe public lands provide substantial benefits to the public and are important to be managed in a way that allows for continued access and use. Because Executive Order 14008 has been rescinded the USFS should not be moving forward with this process to amend the forest plan in order to address climate change.Please stop this unnecessary and overreaching program.Please add ohv recreation to the travel plan. It is unconscionable to submit a plan that does not cover the largest use of public lands. I support the OHV use on public lands.I'm a disabled limited mobility motorized back country and offroad enthusiast with a family of four. Please keep our woods open and accessible to the public and all types of recreation.I enjoy our public lands and believe they should be accessible to all of the public. With up coming closures and budget issues this undertaking doesn't make economical sensePlease Open up the land to OHV recreation and camping use. Eliminate wilderness areas and monument land. Give the public land back to the public to be enjoyed by all users.I am currently an active member of BlueRibbon Coalition, Walker Rim Rider's, Lodgepole Dodgers and some less formal outdoor activity groups. I have in the past served on BLM and Forest Service advisory committees and RACs where I helped local governments decide how to spend revenue from Federal timber sales. I was born in western Oregon in 1941 and have lived here all of my life. It has been a great place to grow up, raise my family and spend as much time as I can outdoors. I live an hour from the ocean and two hours from the snow.I was able to attend an "open house" recently in Springfield, Oregon that was held to present the work done so far on the this Northwest Forest Plan Amendment.I am sorely disappointed in what I saw and heard. My organization sent an extensive list of suggestions to the committee that was constituted to collect suggestions for this process. None of them appear to have been incorporated.I found nothing that emphasized the importance of speedy rehabilitation and restoration of areas that provide recreation and access to recreation for outdoor enthusiasts, particularly the elderly and handicapped.I see the reference to the importance placed on coordinating and cooperating with other governments but the only governments mentioned are tribal governments.I see nothing about the importance of considering RS 2477 Roads and Trails.Not one of the alternatives suggested mentions the need to create more outdoor recreation including motorized. This is a dire need given our aging population.I could say much more, but I'm out of time!!Closing areas to any form of recreation in areas previously open is extremely disheartening to everyone. I understand the need to maintain these areas to address environmental concerns, but in no way should that mean they get "CLOSED" as a simple solution to budget constraints or to avoid performing required mitigation actions! I strongly support whatever alternative can be developed to avoid closure.I would like to see

more logging on public lands that would keep roads open and cleaned up and the forests cleared of underbrush. You can do this with out any clear cutting. Just managed thinning. It would pay for itself and make the forest healthier at the same time. Given the current state of federal government funding, this amendment is a complete waste of time and dollars as it is unlikely to have any positive impact so it should be put on hold. [bull] Federal Agencies Are Already Under a Project Freeze with including the USFS and other agencies who have put critical projects on hold, including recreation improvements, land management updates, and infrastructure repairs. Why should this amendment process be exempt? [bull] The Climate Change Directive (Executive Order 14008) Behind This Plan Has Been Rescinded, the Northwest Forest Plan Amendment cites Executive Order 14008, which directed agencies to take broad action on climate policy has also now been rescinded, making this plan inconsistent with current federal directives. [bull] Instead of focusing on pressing land management issues such as trail maintenance, wildfire mitigation, and recreation access, the USFS is spending taxpayer dollars on an unnecessary amendment process that contradicts current federal policy. [bull] The Northwest Forest Plan already restricts access, limits active forest management, and prioritizes preservation over sustainable land use. Moving forward with further amendments will increase road closures, restrict recreation, and negatively impact rural economies at a time when these services are critically needed. Please reconsider moving forward with this waste of time and resources which also further limits access to recreational activities for all. It is important to stay in line with this administration's executive orders - in both action and in spirit. Public lands are for the public. I've been hunting hiking fishing and dirt biking all over the west my whole life I consistently come across areas that are closed to me now. I see the forest fires due to the lack of proper management of the forest. Timber sales have traditionally been away to thin the forest by clear cutting this tool is not always the best for the public but the most profitable for the timber companies. These clear-cut areas two and three years after the harvest have more animal life than the areas of the forest that weren't timbered. Everyone needs to use the forest for commercial purposes for recreation it's the way it's always been closing up and locking us out serves no purpose other than to make more spectacular fires when they happen. This plan is out of place and not necessary at this time. We need to increase public use and reduce fire danger by thinning trees and brush Not useless plans Past efforts by the USFS have shown that their forest management has not helped climate change but made it worse. An active forest is a healthy forest. People need to be part of using, enjoying, and participating in a healthy forest. I and my wife are ADA certified permanently disabled and oppose any actions that restrict our motorized access to any and all public (USDI BLM) lands, Congressionally Reserved (USDA FOREST SERVICE) lands and any USDI NPS or National Monument land. The Public has the right and the ability to responsibly recreate on their public lands. I'm opposed to any more restrictions to our access to outdoor recreation. It is my belief that these restrictions just set these lands aside so that special interest groups may plunder them in the future. Once again, I would like to say I'm opposed to any and all new restrictions to Public Access. USFS and BLM have forgotten the original reason their agencies were created. Both Agencies need to be rebuilt from the ground up. They must also be Taught what Authority they have and Do Not Have! They both need to go back to Work and stop driving around in Government Vehicles. I acknowledge that there are some land users who are careless and irresponsible. As in many situations, a few spoil it for many. I believe that vast majority of users respect the ability to access the wonders of our parks and recreational areas and will use the land responsibly. Please vote to allow us to continue to access it for generations to come.