

Data Submitted (UTC 11): 3/14/2025 4:00:00 AM

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Organization:

Title:

Comments: I have owned forest land in Oregon for over 50 years.

Sincerely,

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DOC 6 Comments NW Forest Plan Amendment

Please accept this comment on the Draft Environmental impact Statement for the proposed Northwest Forest Plan Amendment.

The landmark plan warrants updates to address Tribal inclusion and incorporation of indigenous Knowledge, address the dual climate change and biodiversity crises, and increase wildfire resilience.

THE TRIBAL INCLUSION PLAN COMPONENTS SHOULD INCLUDE ALL OF THE NW FOREST PLAN REGULATIONS AND PROTECTIONS EXCEPT CULTURAL BURNING AS IT HAS A HISTORY OF BURNING OLD GROWTH FORESTS.

OLD Tree ID

PROTECTION OF OLDER TREES IN THE BLM RMP IS NOT HAPPENING.

WE ARE CONCERNED AND WANT PROTECTION FOR OLDER TREES! BY ANY REASONABLE METHODS.

ALTERNATIVE D WOULD INCREASE LOGGING COMPARED TO ALTERNATIVE B. IT WOULD ENCOURAGE ADDITIONAL FUELS TREATMENT ACRES IN AREAS WHERE RISKS OF ADVERSE EFFECTS OF FIRE TO PEOPLE, PROPERTY, AND INFRASTRUCTURE ARE HIGH; PROVIDE MORE FLEXIBILITY FOR DRY FOREST RESTORATION TREATMENTS; PROVIDE AN EXEMPTION FROM THE SURVEY AND MANAGE PROGRAM FOR HAZARDOUS FUEL REDUCTION TREATMENTS ADJACENT TO COMMUNITIES; EXPAND THE MANAGEMENT FRAMEWORK FOR ADDRESSING WILDFIRE RISK TO

COMMUNITIES; AND ALLOW SALVAGE ACTIVITIES AS UNDER ALTERNATIVE A, EXCEPT IN STANDS ABOVE 120 YEARS OLD IN MOIST LSR.

NW Forest Plan Amendment. November, 20 ,2024

Below is a summary of proposed changes to the NWFP as described in Alternative B, the agency's proposed action. Many of the proposed changes mirror changes that have been implemented by BLM, which left the NWFP in 2016.

Alternative A; No action alternative. Alternative B. Agencies proposed Action.

Tribal inclusion.1. ALLOWS CULTURAL BURNING! WITH PREVIOUS HISTORY OF BURNING OLD GROWTH FORESTS. THIS IS UNACCEPTABLE!

PROVIDE A MORE PREDICTABLE AND SUSTAINABLE SUPPLY OF TIMBER?

ALTERNATIVE C

REMOVING EXCEPTIONS TO PLAN COMPONENTS THAT RESTRICT HARVEST OF MATURE AND OLD GROWTH FOREST STANDS.

DESPITE ALL THE REASONS FOR MAINTAINING THESE OLD GROWTH , ANCIENT TREES, THE EXCEPTIONS THAT LEAD TO THEIR DESTRUCTION ARE NUMEROUS AND REAL!

I AM-CONCERNED THAT THE FOREST SERVICE'S PROPOSED AMENDMENTS WEAKEN PROTECTIONS FROM LOGGING ON OUR REGION'S FORESTS. WITHOUT SAFEGUARDS, THESE CHANGES WOULD DOUBLE OR EVEN TRIPLE LOGGING LEVELS ACROSS OUR PUBLIC FORESTS INCREASING WILDFIRE RISK, IMPAIRING WATER QUALITY AND INHIBITING CLIMATE RESILIENCE, MANAGING FORESTS FOR BIODIVERSITY AND CONNECTED WILDLIFE ACROSS THE REGION SHOULD BE A CORE PRINCIPLE OF THE FOREST PLAN AMENDMENT. HOWEVER THE FOREST SERVICE AMENDMENT DOES NEITHER!

THE AMENDMENT SHOULD PROMOTE FIRE RESILIENCE BUT THIS CAN ONLY BE BOLSTERED BY CONSERVING AND RESTORING MATURE AND OLD GROWTH FORESTS. FUELS AND FIRE MANAGEMENT SHOULD FOCUS ON THE HOME IGNITION ZONE AND ON NON-COMMERCIAL TREATMENTS AND BENEFICIAL FIRE USE, NOT COMMERCIAL LOGGING. INDIGENOUS CULTURAL BURNING AND AND MANAGED WILDLAND FIRE SHOULD BE PRIORITIZED. COMMERCIAL LOGGING FOR FUEL REDUCTION CAN NEGATIVELY IMPACT WILDLIFE HABITAT, REMOVE LARGE FIRE RESISTANT TREES, INTRODUCE INVASIVE SPECIES, AND CREATE HAZARDOUS FIRE CONDITIONS. STANDARDS MUST ENSURE THAT FUEL REDUCTIO IS BOTH NEEDED AND EFFECTIVE BEFORE LOG.GING IS ALLOWED. -

THE AMENDMENT SHOULD RECOGNIZE THE WIDE VARIETY OF SOCIAL AND ECONOMIC BENEFITS

NATIONAL FORESTS PROVIDE FOR LOCAL COMMUNITIES AND THE REGION AS A WHOLE - NOT JUST TIMBER, BUT ALSO CLEAN WATER, CLIMATE STABILITY, QUALITY OF LIFE AND OUTDOOR RECREATION'

THE FOREST SERVICE SHOULD DO THE FOLLOWING; Adopt all tribal components analyzed in the DEIS in any final decision. Go beyond Tribal consultation to involve Tribes and indigenous communities in forest management decisions. The Forest Service must support co-stewardship agreements, cultural burning practices. First food harvesting, and youth education while ensuring equitable access to planning processes. Pairing these components with weakened environmental protection is a false choice manufactured by the agency.

WHAT! THIS IS TOTALLY UNACCEPTABLE. ALLOW SALVAGE ACTIVITIES AS UNDER ALTERNATIVE A., EXCEPT IN STANDS ABOVE 120 YEARS OLD IN MOIST LSR UNLESS SALVAGE IS FOR TRIBAL CULTURAL USES.

ALTERNATIVE D WOULD INCREASE LOGGING COMPARED TO ALTERNATIVE B

Expand the management framework for addressing wildfire risk to communities; and allow salvage activities as under Alternative A. except in stands above 120 years old in moist LSR unless salvage is for tribal cultural uses.

THE CULTURAL USES OF SALVAGE LOGGING OF STANDS 120 YEARS OLD OR MORE SHOULD NOT BE ALLOWED. SALVAGE LOGGING SHOULD NOT BE USED AT ALL.

USING ECOLOGICAL FORESTRY METHODS , TO BOLSTER TIMBER PRODUCTION WHILE ALSO CONSERVING AND RETAINING OLDER TREES. THIS REQUIREMENT TO LOG IS ALSO PRESENT IN THE 2016 RMP AND HAS SOME TROUBLING IMPLICATIONS FOR THE AGENCY'S NEPA ANALYSIS. GIVEN SIMILAR MANDATES, BLM BEGAN PLANNING LARGE-SCALE, LAND ALLOCATION WIDE LOGGING PROJECTS COVERING TENS OF THOUSANDS OF ACRES. THE SCALE OF THESE PROJECTS PRECLUDED SITE-SPECIFIC ANALYSIS UNDER NEPA AND LED TO THE AGENCY TO ATTEMPT TO BYPASS SURVEY REQUIREMENTS. THIS HAS LARGELY RESULTED IN BLM

COMPLETELY IGNORING AND ATEMPING TO BYPASS ANY FOREST PLAN STANDARDS.

DRY

The amendment Establishes a mandate to log 1/3 of dry forests within 15 years across ALL LAND USE ALLOCATIONS. 'ADDS A PLAN OBJECTIVE STRIVING TO TREAT ONE-THIRD OF DRY FORESTS ACROSS THE ENTIRE NWFP AREA WITHIN 15 YEARS. THIS COULD AMOUNT TO NEARLY 1,000,000 ACRES LOGGED.

THIS CATASTROPHE SHOULD NEVER BE ALLOWED ! IN THE MOIST MATRIX,

Old Growth protections are created for stands established prior to 1825. Trees that originated

after 1905 trees should be retained to meet variable retention expectations and woody material for wildlife and site productivity. However even in these old trees there remains exceptions.

Tribal co-stewardship and cultural use or to reduce wildfire risk and permits for their logging for operational purposes.

In the moist matrix "timber harvest in mature forest stands (those established between 1825 and 1905) should only occur to maintain and restore ecosystem integrity and to meet variable retention expectations, except for operational purposes (a) reducing the risk of fire. (b) developing and enhancing late successional habitat such as the northern spotted owl, marbled murrelet and coastal marten;(c)maintain or restore habitat for other species (d) meeting tribal cultural use. This provision adds LSR direction to logging mature moist matrix stands.

Strengthen protections for mature and old growth forests to ensure habitat, water quality, and carbon storage and recruit more forests with old growth characteristics to restore a functioning ecosystem. Choose an alternative that allows natural process to flourish, ensure connectivity for wildlife, and support the recovery of imperiled species.

Shift wildfire strategies to prioritize community safety and preparedness measures over logging. Minimize Indigenous cultural burning especially in mature and old growth stands.

Address environmental justice by analyzing impacts on air, water and communities and ensuring fair, sustainable working conditions and less logging.

We need a strong forest plan that ensures robust Tribal inclusion, advances ecologically sound forest management for climate and wildlife resilience and supports the needs of current and future generations.

Table 3-2 Current and proposed LSOG management thresholds for conservation by alternative.

Alternative A	Alternative B, C and D (NO ACTION)	proposed action	Federal	Harvest up to
120 to 150 years in Forest	up to			all land types,
80 years is	IS NOT PREFERRED!	PREFERRED!		

HARVESTING UP TO 120 or 150 YEARS IS NOT PREFERRED BECAUSE IT WILL PREVENT THE FORESTS FROM BECOMING OLD GROWTH STANDS IN THE FUTURE!

Further such logging adds volume goals to LSR TREATMENT OF 660 000-810,000 acres per decade (5900-13500 MMBF sold) PER DECADE.

SALVAGE LOGGING WILL TAKE PRECEDENCE OVER RIPARIAN RESERVE STANDARDS AND AND GUIDELINES TO MEET FIRE BEHAVIOR OBJECTIVES.

THESE PROVISIONS ARE ADDITIONAL EXCEPTIONS TO PERMIT SALVAGE LOGGING IN COMMUNITY PROTECTION AREAS".

ATTACHMENT-LETTER TEXT: MitchellDrCutin_2025-314_NWFP_DraftEIS_Comments.pdf; this is the same content that is coded in text box; it was originally included as an attachment