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Comments: Thank you for the opportunity to comment on the Proposed Action of the Northwest Forest Plan revision. I have lived most of my 70 years in the rural areas adjacent to National Forests in Oregon, Washington, and California. The proposed actions as listed in the Federal Register /Vol. 88, No. 241 /Monday, December 18, 2023 are all relevant and timely to these areas. My comments on these actions are included below, with the wording from the Federal Register notice included in italics.

* 1. Improve fire resistance and resilience.
Wildfires have occurred within 10 miles of this area in western Oregon almost annually in the July and August since 2017, whereas they did not occur during these months very often prior to that year. This appears to be due to warmer drier summer conditions. We have seen a variety of fire behavior in these early summer months, based on different forest types, ages, aspects, elevations, etc. The lightning started fires during these months usually start at higher elevations away from residential areas. They do not travel far under "normal" weather conditions. However during these months the increase in human-started fires has been significant, and these start in areas closer to residential areas.

The historic record shows that the most significant fires occurred during between late August and late September, because of strong east winds. The 2020 Labor Day wildfires were driven by east winds and started from both lightning and humans. The wind in 2020 was stronger and drier than previous years, probably as a result of climate change. The extreme winds blew trees onto powerlines which ignited some of the fires. Some of the fires had also started from lightning strikes which smoldered for several weeks before Labor Day. Regardless of the cause of the fire, they spread at unforeseen speeds. When the smoke cleared to was apparent that no amount of forest fuels treatment slowed or stopped the fires. The two "less burned" areas were residences with well-watered defensible space, and some of the most moist, leeward hill-slopes areas that were primarily mature and old-growth timber. Forest stands 80 years and younger burned like candlesticks.
Some important considerations in improving fire resistance and resilience are:
-identify and treat stands that were clearcut between 1950 and 2000 because they were replanted very densely which has resulted in very high fuel-loads;
-Continue recognizing the role of forests in retention of carbon in solid form (not as CO2), as a means of improving fire resilience;
-Provide programs to reduce the rate of fires starting from people's infrastructure and activities;
-Prioritize treatment relative to their proximity to homes and other infrastructure;
-Analyze and disclose the effectiveness of fuels reduction treatments in areas where wind-driven fires have occurred in the last 10 years. Unfortunately the wind-driven fires may be the overriding fire events on the landscape in the future.

Direction should reflect differences in dry and moist forested ecosystems, non-forested ecosystems, and in riparian areas." Direction should also reflect the importance of protecting infrastructure such as cell towers, hydropower projects, recreation cabins, campgrounds, etc.
Support the Forest Service's Wildfire Crisis Strategy. This Strategy focuses on extensive and expensive fuels treatment. A clear discussion of the potential success of these treatments needs to be presented. Also the Strategy does not discuss how to reduce the extremely high percentage (85 to 95%) of wildfires that are started by people. Although highly unpopular, the need for and consequences of "shutting the forest down" under some criteria of conditions need to be publicly evaluated. How are the current Public and Industrial Precaution Levels working? Where do they fit into the Strategy?

* 2. Strengthen the capacity of NWFP ecosystems to adapt to the ongoing effects of climate change and to mitigate impacts of climate change.
This is an important and challenging task, given the rapid rate of climate change, and the relatively slow rate of adaptation of ecosystems. A key part of this is to maintain the water holding capacity of both aquatic and terrestrial ecosystems. This means retain crown cover in forested areas to minimize warming and evaporation from the forest floor materials, and to minimize the rate of transpiration of vegetation. This topic is critical to both fire management, old-growth sustainability, and community safety.

* 3. Improve sustainability of mature and old growth ecosystems by providing plan direction to maintain and expand mature and old growth forest conditions and reduce loss risk across all land use allocations.

I support this. The older trees provide many ecosystem services, wildlife habitat, species diversity, and runoff reduction, which are discussed extensively in the Bioregional Assessments. For people, they provide a sense of historical context for people's lives, and a place to understand that people do not, and cannot control or create a place as intrinsically complex and resilient as the trees which have been growing before the Declaration of Independence, before Lewis and Clark, and before Gifford Pinchot.

* 4. Add plan direction incorporating Indigenous Knowledge.
I support this. Any culture that could sustain themselves and no compromise the productivity of the environment for many thousands of could have something to add to this Plan. And I'd like the wording of Treaties and "Nation to Nation" agreements to be kept.

* 5. Support the long-term sustainability of communities.
Fed Register P 87397 "The NWFP has largely not achieved its timber production goals, which were the NWFP's primary criteria for supporting economies and community well being."
The demographics and economics of timber harvest and processing in communities to be evaluated to determine whether "timber production levels" are a still a valid "criteria of support for local economies and community well-being." (emphasis added).

Decades ago there was a small mill in every small town. Changes in mill technology and abandonment of "vertically structured" corporations have resulted in timber related employment opportunities moving from smaller towns to larger cities. The expenses of more highly efficient milling equipment forces it to be centralized in larger mills than thirty years ago. It is cheaper to haul the logs the additional distance than to have milling equipment closer to the tree harvest areas. Providing more harvest under these conditions would not result in more rural jobs. In the larger towns the effects of the USFS timber production level are often barely noticeable in the overall economy.

There are thousands of acres that were clear-cut since 1960, therefore are under 80 years old. These can be managed to produce timber on a predictable rotation. These lands already have road systems and are on the lowest gradient slopes. Most mills have converted out of equipment that will handle logs larger than 25 inches, so cannot efficiently handle the larger, older trees. In our area, small portable mills are popular and provide some local employment. Some grant assistance to this scale of timber process would be helpful.

The basis of rural economies has changed rapidly over the last decade due to the increase of people with Internet-based jobs and increase in commercial recreation because the internet marketing. Housing shortages exist because of external reasons such as inflation rates, people buying second-homes that are empty for most of the year, and homes being converted to vacation rentals. Also, multi-unit housing (apartments etc.) are difficult to build because the basic infrastructure systems needed for high-density housing, such as water supply waste-water treatment are not available. In this area even people with full time jobs in the Forest Service District, and at the school, cannot find housing. More flexibility in criteria for sharing or renting out Recreation Cabins on National Forests could be part of a solution to ease the housing shortage of local communities.

The metrics of what products and services create healthy sustainable communities needs to be closely evaluated. It is much more than timber harvest levels.