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Comments: As a former resident of Oregon who retains existential attachment to its forests, and more saliently a resident of this ecologically suffering world, I urge you to revise the Northwest Forest Plan toward the maximum retention and recruitment of old-growth forest. As our world is shorn of its climax forest biomes, driven toward hotter temperatures, and denuded of its intricate biodiversity, the Forest Service's first priority, it its takes seriously its mandate toward a cognizable national and public interest, must be to mitigate and counterbalance these trends, not accelerate them.

Unfortunately, the DEIS action alternatives appear geared toward indulging the preferences of FS timber managers to return to their unrestrained bad behavior that predated the 1994 NWFP, threaded through a panoply of exceptions, loopholes, and other forms of 'flexibility' whose cumulative sum is an absence of any legally enforceable constraint. The ghastly consequences of this attitude can be seen on adjacent Bureau of Land Management lands in Oregon, which summarily excused itself from the NWFP in 2016, and has subsequently binged on old-growth logging, again cloaked in terms of 'fuels reduction' or some-such, to the great injury of neighboring towns, watersheds, and every old-growth dependent creature.

The Proposed Action (Alternative B) calls rather nakedly for logging Late Successional Reserves in any circumstance the FS wishes, by creating a new exception to allow logging to "restore habitat for other species that depend upon younger stands" and to "achieve other desired conditions." Respecting the first clause, younger stands are now the rule, not exception, across the Pacific Northwest. There is no circumstance in our region in which eliminating old growth forest in favor of younger stands would incur a net benefit to the sustenance of biodiversity. The second clause appears to be an all-purpose license for converting mature stands, which had been intended to evolve toward old-growth conditions, into timber production without formally declaring so upfront.

This strategy appears to be made implicit in its treatment of 'Matrix Lands,' which are opened to logging without exception for stands established after 1905, and for a variety of reasons at the discretion of the FS for stands established after 1825. By limiting protection to forests established before a certain date, rather than forests of a certain age, the FS gives itself indefinite time to log forests with a certain birthdate, regardless of its present development into old-growth. This subverts the purpose of the NWFP through a clever trick of mathematical inversion, from a vision of old-growth recruitment and reparation of past losses, to map lines tied to a static past date, delineating forests forever condemned to logging at FS discretion and to never become old-growth.

This continued old-growth logging reflects the seemingly interminable inertia of the FS timber program from a generation or two ago, which agency staff stubbornly refuse to discard no matter how harmful it becomes. Old-growth logging also explicitly ignores the overriding national interest in protecting this critical component of Earth's life-support system. Federally owned lands are home to a large portion of the ancient forest remaining in American jurisdiction, and its destruction constitutes a brazen dereliction of America's responsibility to maintain Earth's palette of biodiversity and its life-sustaining capacities of oxygen production and carbon sequestration. No agency that claims to take climate change seriously can log old-growth forests and vaporize these voluminous carbon sinks.

Our remaining old-growth forests are national treasures, whose biological value vastly outweighs the value of any timber that will be extracted from it and dumped onto markets for wood pulp and lumber, whose gross waste into landfills is disproof of any acute need for supplemental inputs from federal land. The vision of Alternatives B and D for producing over 1 billion board feet from the NWFP area (roughly tripling current levels from the FS component) is overly infatuated with selling plant cellulose and lignin, which our economy could easily conserve or replace more readily in 2025. This exchange of a high-value biological treasure for a low-value commodity of wood pulp and lumber is the exact antithesis of serving the public interest with a basis in rationality, science, and moral common sense.

The FS must also divorce its fire risk mitigation from its logging program, which today are financially and administratively joined, but act at ecological and scientific cross-purposes. Old-growth forests are consistently found to be the most fire-resistant forest type, while the young stands so beloved of timber planners most frequently erupt in flames in today's perennial fire season. The proposed redefinition of 'young' lands from a maximum of 80 to a maximum of 120 years is arbitrary and counterfactual here. The proposed exception for post-fire 'salvage logging' also indulges the fiction that this is compatible with recovery after fires, contrary to decades of evidence that it exacerbates nutrient loss and frustrates recovery by erasing refugia for life, stripping remaining biomass, and churning and baking the soil surface.

If the FS is serious about reducing wildfire severity in the coming century of climate change, it must devote its chainsaws to selective thinning of second-growth stands and timber plantations, to accelerate their canopy closure while reducing their understory. These activities do not slake the appetites of the timber industry, and will demand clarity of ecological thinking by Forest Service staff, while resisting the resource extraction mindset. I urge you to develop an Action Alternative that recognizes and honors the goal of the Northwest Forest Plan, to retain and recruit old-growth forest and its imperiled dependent life, by limiting logging to thinning projects that will truly and measurably accelerate its development or mitigate fire risk in younger stands, not 'gap creation,' 'group selection,' 'stand regeneration,' or other clearcut euphemisms that countenance Earth's biological meltdown, driven by the ulterior motive of commodity production.