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Comments: Thank you for the opportunity to comment on the Draft Environmental Impact Statement for the Northwest Forest Plan Amendment. I appreciate the Forest Service's effort to update the Northwest Forest Plan. The Plan, while successful in many respects, needs an update to account for changing conditions in Pacific Northwest forests and to correct for limitations of the original plan.

Overall, I recommend that the Forest Service adopt a combination of changes reflected in Alternative B (the proposed alternative) and Alternative C. Many of the proposed changes under Alternative B are well-founded and will improve the likelihood of the Northwest Forest Plan achieving its goals. In particular, the increased emphasis on Tribal Inclusion, consideration of climate change, and focus on reducing the risk of severe wildfires are all welcome changes to the Plan. The increasing frequency and size of high-severity fires since the introduction of the Plan poses a significant risk to old growth and late seral stage forests in the Pacific Northwest, along with the communities in and around these forests.

However, there are some aspects of the proposed Alternative that are not sufficiently justified or that could be misused in ways that are counter to the goals of the Northwest Forest Plan. Here are specific recommendations for changes for the Final Environmental Impact Statement/Record of Decision.

1. Adopt a compromise stand age cutoff for treatments/timber harvest in moist stand LSRs. While I think it makes sense to increase the stand age cutoff from 80 years, increasing it to 120 years may expose some stands to harvest/treatment that are well on their way to old growth conditions. Instead of 120 years, I suggest a compromise age cutoff of 100 years for treatments in moist LSRs.

2. The 150-year age threshold for treatments in dry forest LSRs is too high and may expose stands to harvest/treatment that are well on their way to old growth conditions. Instead, I suggest an age cutoff of 120 years in dry LSRs.

3. Broadly speaking, fuel treatments in moist forest stands are illogical because the fire return interval is typically low in moist stands and because vegetation will typically grow back much faster than in dry stands. There should be a high degree of scrutiny for any timber harvest or vegetation management in moist stands that are justified based on wildfire risk reduction.

4. While I concur that increased extent and frequency of vegetation treatments are needed to reduce the risk of severe fires, those vegetation treatments need to be paired with prescribed fire or natural wildfire ignitions that are allowed to burn. Scientific assessments of fuel treatments have found that a combination of vegetation removal/thinning and prescribed burning is much better at reducing severe wildfire risk than vegetation removal/thinning alone. However, it is often easier for the Forest Service to implement thinning treatments than prescribed fires. The Plan amendment needs to define mechanisms that obligate the Forest Service to follow-up vegetation treatments/thinning with prescribed fire. I am concerned that the proposed amendments will result in increased timber harvest under the guise of wildfire risk reduction without implementing prescribed burns that are critical to promote resilience in dry forest stands. Furthermore, any vegetation management/thinning in dry forest stands that have the goal of wildfire risk reduction should focus on brush removal and smaller diameter trees. This is the opposite of timber harvest to maximize profits, which targets the largest trees.

5. As proposed in Amendment C, the Forest Service needs to allow more natural ignitions to burn when appropriate given weather conditions and risks to communities. In the long-term, we will only be able to restore fire-resilient forests by allowing fires to burn naturally. Every time the Forest Service extinguishes a natural ignition, it prevents an opportunity for our forests to re-develop their natural fire return intervals. The Forest

Service will never be able to treat sufficient areas with mechanical thinning and prescribed fire alone to restore our fire-prone forests to their natural state. Instead, we need to leverage natural ignitions to complement mechanical thinning and prescribed fire. I suggest the Plan Amendment adopt explicit constraints regarding when individual National Forests can extinguish natural ignitions, particularly in dry forest stands.

Thank you for considering my input,

Aaron David