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First name: Jeff

Last name: Stephens

Organization:

Title:

Comments: Thank you for considering my comments. I support Alternative B, which provides a new or modified direction, for the 1994 NWFP. It builds upon the goals of the 1994 NWFP using updated science and monitoring data but does not abandon the original intent and replace it with economic objectives (Alternative D). The science has also shown that the No Action Alternative is not working as well as anticipated.

Alternative C takes a hands-off approach, and active management is needed to correct forest management mistakes of the past. According to the Bioregional Assessment of Northwest Forests (USDA Forest Service 2020), a substantial proportion of the area lacks structural diversity and resilience and does not adequately contribute to ecological integrity.

My comments address three significant issues identified during scoping: forest stewardship, fire resistance/resilience, and tribal engagement. I am especially interested in the dry forests in the east Cascades of Oregon.

With no changes, the modeling suggests that more old growth will be lost due to fire, drought, and insects. Increased management activities in Alternative B are needed to promote dry forest restoration to reduce risks to older trees from fire, drought, and insects exacerbated by climate change.

With increased treatments, dry forests will become more open and reflective of historic range of variation, with fewer dense, multi-canopy stands. Dry forest stands would be more heterogeneous and reflective of conditions prior to fire exclusion activities and thus more resilient of more frequent fires.

Furthermore, treating additional community protections areas (150,000 acres per decade) under Alternative B is needed, especially in those areas that have already demonstrated through land use regulations in the wildland-urban interface a desire to make proactive steps in fire risk reduction.

The original 1994 NWFP made an egregious error by not containing provisions relevant to tribal inclusion or incorporating Indigenous Knowledge in forest management. Any changes to the 1994 NWFP should create a tangible framework along with outcomes for improving relationships between Tribes and the Forest Service.

I support that Alternative B requires a specified number of co-stewardship projects to completed. I believe that the Forest Service should engage with Tribes on an annual basis to develop and implement approaches to forest management in areas of tribal importance, including culturally significant species.

To conclude, it is critically important to restate in the Final EIS that the proposed amendment is programmatic in nature and intended to guide development of future site-specific actions but would not authorize any specific project or activity in and of itself. When a specific project or activity is proposed, the Forest Service is mandated by law to conduct a site-specific analysis under NEPA.

Thank you.

Jeff Stephens