

Data Submitted (UTC 11): 3/11/2025 5:21:31 AM

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Comments: To Regional Foresters Jacque Buchanan and Jennifer Eberlien:

Thank you for the opportunity to comment on the Northwest Forest Plan amendment.

The original Northwest Forest Plan was intended to last 100 years. To be good stewards of that effort we must repair its shortcomings and not allow it to be further degraded. None of the alternatives in the Draft Environmental Impact Statement (DEIS) are good enough to uphold that legacy.

The Forest Service should retain all of the Tribal inclusion plan components that are in Alternative B, but uncouple them from the forest management components that allow older trees and forests to be logged.

Preserving biodiversity and connected wildlife habitat across the region should be a core principle of this forest plan amendment. This includes not only threatened species, but others that have been impacted by the loss and fragmentation of their habitat, and those awaiting state and/or federal Endangered Species Act listing decisions.

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 DEIS' view of fire as the primary threat to the remaining late-successional reserves is a mistake -- logging is the greater threat.

Fire resistance and resilience can be enhanced by preserving 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 wildland fire use 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 reduction is both needed and effective before logging is allowed.

The Forest Service must reject plans to weaken core protections of the Northwest Forest Plan, and do the following:

1. Strengthen protections for mature and old-growth forests to ensure habitat, water quality, and carbon storage, and recruit more mature and old forests to restore a functional ecosystem.
2. Maintain or expand protections for the network of forest reserves to allow natural processes to flourish, ensure connectivity for wildlife, and support the recovery of imperiled species. Any reduction in forest reserve protections would increase harmful impacts such as habitat destruction, sediment in streams, and carbon loss, further endangering sensitive ecosystems.
3. Genuinely consult with Tribes, respect their sovereignty, and provide resources to support their full participation in decision-making. 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 the Forest Service's plan for weakened environmental protections is a false choice manufactured by the agency.

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

5. Shift wildfire strategies to prioritize community safety and proven prevention measures over logging.

The Federal Advisory Committee process that informed the DEIS was rushed, excluded scientists and adopted scientific findings in a biased manner. The amendment should enhance the Northwest Forest Plan by adding to its network of reserves, not opening the door to logging them in the name of preservation.

A strong forest plan must incorporate modern science and public values, robust and honest Tribal consultation, and the needs of future generations.

Thank you.

Kevin Gallagher