

Data Submitted (UTC 11): 3/13/2025 3:01:55 AM

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Organization:

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Comments: To whom it may concern:

I am a lifelong pacific northwesterner. Like all of us, I am privileged to live in a beautifully temperate, water-rich, and diverse ecosystem. Thanks to the Northwest Forest Plan, the trees, fish, birds, and other wildlife on which our resiliency to continue thriving in an era of heightening climate volatility still survive in some part.

The alternatives laid out in the NWFP Amendment Draft Environmental Impact Statement (DEIS) released by the Forest Service in November of 2024 considers four alternatives all would put that resiliency, along with the economic productivity of our region, at great risk.

With old-growth forests continuing to be threatened even under the current NW Forest Plan, it is critical that we maintain and extend protections of mature forest to regenerate the incalculable loss of old-growth forest we have already suffered.

Additionally, the Northwest Forest Plan encompasses lands occupied and stewarded by over 80 Tribes since time immemorial. The Forest Service must finally uphold its obligations to these Tribes, which were left out of the original planning process.

Supporting tribes means providing the resources and support necessary to ensure equitable access to planning processes and meaningfully engaging with Tribes in a manner that respects their sovereignty and relationship to the Pacific Northwest's forests and waters.

An amended Northwest Forest Plan must also prioritize Tribal access to harvest first foods, support cultural burning practices, promote the use of co-stewardship agreements, and support workforce development and youth education.

I am highly concerned that in the DEIS the Forest Service has created a false dichotomy between strengthening environmental protections and ensuring that the amendment incorporates Tribes. I support the Forest Service's efforts to meaningfully incorporate Tribes, and there is simply no reason the agency cannot pair these efforts with improved and expanded ecosystem protections rather than conservation rollbacks. The Forest Service should include the same strong Tribal inclusion components in all of the action alternatives.

To ensure an amended Plan addresses the needs of the forest communities, the Forest Service must also analyze any proposed amendment in light of air and water quality impacts, climate change, and recreational uses and employment. This includes analyzing how logging projects that could occur under the Plan may increase wildfire risk to nearby communities by removing large, fire-resilient trees and "salvage logging" after landscape disturbance.

Beneficial fire use:

Fire is a vital and inevitable ecological process that rejuvenates fire-adapted ecosystems, regenerates fire-dependent species, and maintains habitat mosaics that enhance biodiversity. The misguided era of attempted fire exclusion and aggressive fire suppression across public wildlands must be replaced with a new paradigm of fire inclusion and ecological fire management.

Federal resources should support Tribal fire management programs by assisting with the expansion of the Tribal wildland fire workforce and eliminating bureaucratic barriers to implementing cultural burn projects. It is disturbing that the proposed alternatives pit increased tribal fire management against increased environmental protections.

This is a false choice created by the Forest Service.

Mature and old-growth forests are degraded by conventional firefighting operations that include the use of bulldozers, fellerbunchers, chemical retardants, and high-intensity backburns. Mature and old-growth forests are better protected with ecological fire use from proactive prescribed burning rather than reactive aggressive firefighting.

Fire risk reduction

I am alarmed that the Forest Service's proposed alternative exploits the fear of fire to justify a significant increase in logging on our public lands. All of the action alternatives include significant handouts to the timber industry under the guise of "fuels reduction" at the expense of the communities who are most vulnerable to losses from wildfires. Many "fuels reduction" projects that could occur under the proposed alternative would increase the risk of wildfire and make fires more severe when they do occur.

Fire resistance and resilience can be bolstered by ensuring the ecological integrity of mature and old-growth forests. On the other hand, cutting these older forests down reduces fire resilience.

Fuels and fire management should prioritize and focus on reducing risks and hazards within the home ignition zone using non-commercial treatments including prescribed burning fire use, not commercial logging.

Commercial logging for fuel reduction can negatively impact wildlife habitat, remove large fire-resistant trees, and create more hazardous fuels conditions.

Fuel reduction should focus on treating small-diameter surface fuels. Commercial logging for fuel reduction has too many corrupting economic influences that can make fuel conditions worse instead of better, such as by removing large fire resistant trees that shelter surface fuels and vegetation from the sun and wind.

Commercial logging generates hazardous slash, and spurs the growth of more-flammable grasses, shrubs, and invasive weeds, making the stand hotter-drier-windier with flashier fuels.

Salvage logging-the practice of cutting what trees remain after a landscape disturbance such as wildfire-is incredibly harmful to a forest's ability to recover from disturbance and harms species that depend on dead and dying trees. I appreciate the proposed action alternatives de-emphasis on salvage logging, but a real moratorium is needed except to remove truly hazardous trees along roads and trails.

Let's not carelessly squander the basis for our children and grandchildren to thrive. Please, build on the legacy of the NW Forest Plan and keep moving its aims forward- don't destroy the last generation's legacy and the survivability of our future. Don't undermine what makes the Pacific Northwest a unique and strategically-important store of biodiversity, carbon, water, and natural beauty.

Sincerely,

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