

Data Submitted (UTC 11): 3/13/2025 4:29:44 AM

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Comments: Northwest Forest Plan(NFP) claims to rely on the best available science-yet this continues to push a wildfire plan built on outdated, misleading, and outright dangerous model based assumptions. Instead of protecting communities, this is wasting millions of taxpayer dollars on destructive thinning projects, many of which have been shown to increase wildfire intensity, devastate ecosystems, and accelerate carbon emissions. This is not resilience.

The facts are clear: catastrophic wildfires are not driven by fuel loads in forests, but by human development patterns, extreme drought, and high winds. A 2025 "Early Insights" study by the Insurance Institute for Business & Home Safety (IBHS) on Los Angeles County wildfires reaffirms this, demonstrating that wildfire conflagrations spread through both densely built communities and intact forests.

Firefighters and scientists agree: embers, wind, and the built environment-not forests-determine whether a wildfire becomes a deadly disaster. Yet the NFP will waste public funds on large-scale thinning projects that do nothing to stop climate-driven fires. Worse, thinning dries out forests, increases wind penetration, and accelerates fire spread. A Fire Ecology meta-analysis confirms that thinning fails to prevent large, high-intensity wildfires, especially under extreme conditions.

This ignores the science. According to a new California Legislative Analyst's Office (LAO) report, a staggering 98% of California's wildfire prevention funds are poured into vegetation treatments far from homes, while a mere 2% or less supports home hardening and defensible space maintenance-the only proven methods that actually protect homes from wildfire. This misallocation of resources isn't just ineffective-it's dangerous.

This is not just a wildfire issue-it is a climate emergency. Forests are our most powerful tool for carbon sequestration, absorbing 1.1 gigatons of CO<sub>2</sub> annually. Yet logging-including thinning-immediately releases 30-60% of stored carbon through soil disturbance, biomass decay, and emissions (Oregon State University, U.S. Forest Service). By contrast, even in high-severity wildfires, only 5-10% (some studies show considerably less) of forest carbon is lost to combustion (Nature Communications), with the majority remaining stored in soil, unburned biomass, and regenerating vegetation.

If NFP continues to promote this reckless approach, our forests will only reach half of their natural carbon sequestration potential (Erb et al., 2018). The consequences are dire: more carbon in the atmosphere, degraded ecosystems, and communities still left vulnerable to wildfire because resources are misallocated.

This must stop now. NFP cannot afford to waste another dollar on destructive, ineffective forest thinning. They should immediately redirect resources toward proven strategies: home hardening, defensible space within 5-100 feet of structures (particularly in the wild urban interface), and community wildfire preparedness. These are the only measures that have been repeatedly shown to protect lives and property from wildfire.