Data Submitted (UTC 11): 3/13/2025 10:39:00 PM First name: Susan Last name: Crampton Organization:

#### Title:

Comments: First of all, regards and congratulations to R6 PNW, USFS, and USDA that this NWFP Amendment update process has been addressed, and that multi-party input was included with the extensive work from the Federal Advisory Committee, FAC. Lots of work. I myself have Zoom joined several meetings of the FAC, Federal Advisory Committee, as interested public. It is significant that the DEIS incorporated public scoping comments and Tribal input received as well as input from the FAC. It is also significant that it was said along the way in the FAC Zoom meetings that USFS public forests are only 5% of timber lands.

It may seem a small issue but it was notable, and disturbing, that at the FAC Zoom meetings there was talking about sustainable forestry, but what were all of those single use, throwaway paper cups being used by Forest Service and timber members of the FAC? Yes, paper is less worse than plastic or styrofoam but doesn't move along toward sustainability, and forest sustainability. It was notable that most FAC members besides Forest Service and timber members had permanent, reusable cups.

Considering all things, I make public comment at this time as a 78 yr old person, born and raised in timber and logging family in Oregon, living in eastern, north central WA state on the edge of the Okanogan-Wenatchee NF for more than 30 years, having a BA in biology, and having long term and ongoing interest in forestry issues. I often say to people that I was born and raised in timber and logging family, and along the way learned that the forest is more than trees. My focus has become environmental and conservation attention, involvement, and activity. Seeing the degradation of forest habitat, the loss of water quality, the impact to biodiversity, it has been evident that we need to do things in a different way, to learn from mistakes, and make change.

Coming to the Methow Valley in north central Washington in 1993, prior to NWFP, the USFS at Methow Valley Ranger District was still clear-cutting, with all of the negative consequences of that method. After the NWFP, and along with some changes in understanding and education in forest ecology, the protection of Old Growth, Watersheds, and Biodiversity have become part of how things were done. With ongoing research about problems, and possible solutions, the issue of the past century of wildfire suppression - and the resultant forest overgrowth and increase in wildfire activity and intensity - has become a significant topic.

#### FOR DEIS:

SUPPORT: Tribal Inclusion, Tribal Sovereignty and Environmental Justice to honor and uphold Tribal sovereignty and treaty rights, while recognizing that there is much detail and complexity. Tribal Inclusion was not significant in the original NWFP, and is essential now. Not just words but actual involvement. Our local area is in proximity to Confederated Tribes of the Colville Reservation. Changes to the NWFP that make available access and cultural harvesting, as well as cultural burning are important. Fire stewardship and cultural burning with Traditional Ecological Knowledge are significant inputs to the need for change from our own cultural fire suppression and exclusion - that seemed like a good idea, but for which the disadvantages over advantages have become very evident.

SUPPORT: DEIS Attention to Fire Resistance and Resilience.

Fire is normal, natural, necessary, and is an inevitable basic for forest ecosystem function. This is in particular so in our local Dry, fire-adapted, and even fire-dependent, forest systems in the Okanogan-Wenatchee NF. It is very worthwhile that the DEIS repeatedly includes differences between Moist and Dry Forests.

While Fire is normal, Fire exclusion is a serious part of the problem. Tribal Inclusion is worthwhile in fire management programs, with Tribal wildland fire workforce, with increasing implementation of cultural burn projects. Current fire-fighting and fire-suppression with bulldozers, chemical retardants, and high-intensity backburns damage, severely damage and degrade healthy forests. Better to have plan-ahead prescribed burning, not reactive backburns. And, prescribed fire is definitely not just pile burning. Thin and burn forest management must include on the ground broadcast burning to be successful, to be natural.

More important for living with fire is adapting to fire. In my current home in the ONF-WNF, fire adaptation is ongoing, home hardening, buffer space, attention and alert in fire season, awareness of climate change

accelerating the conditions, and more. It was noticeable with the LA fires that people and infrastructure weren't prepared, weren't fire-adapted.

SUPPORT: DEIS Attention to Old Growth.

OG isn't just a "nice" thing. With the realities of climate change, OG and mature older forests sequester and store atmospheric carbon long term, support climate stability, and also increase resistance and resilience to wildfires. Biodiversity habitat and climate refugia are essential extras.

SUPPORT: Better recruitment of Mature trees that will become the next generations of Old Growth.

SUPPORT: DEIS Attention to Biodiversity, and it is important to recognize that NSO is an indicator species, but that Biodiversity attention in DEIS must also include attention to wolverine, fisher, wolf, grizzly bear, Cascade red fox, marbled murrelet, salmon and steelhead, and a long list of amphibians, bats, fungi, mosses, lichens, mollusks, small mammals, and many others. Attention to habitat connectivity and to aquatic ecosystems as well as land ecosystems must be included.

SUPPORT: Forest Restoration but Forest Restoration is more than wood production and economics. SUPPORT: Thinning and Burning but don't overdo that. Overlogging will worsen current forest problems, including flood and erosion after wildfire.

OPPOSE: The increase in age limit for logging. Increasing the age limit from 80 year old trees up to 150 year old trees for logging is not beneficial, and seems more to support timber economy than forest health and sustainability.

ALTERNATIVE A: OPPOSE: Alternative A and No Action. Circumstances of our current times and conditions have changed from 1994 NWFP, and it is evident that management changes are needed.

## ALTERNATIVE B:

SUPPORT: Alternative B with some additions, inclusions from other Alternatives, and some deletions from DEIS Alt B, including deleting the increased age limit for logging from 80 years to 150 years.

SUPPORT: That Alternative B is the outcome of the year long planning process for the Amendment to update the NWFP, and incorporates and is"strongly influenced" by the final recommendations provided by the FAC, Federal Advisory Committee.

SUPPORT: Tribal Inclusion that is more than "consultation" and incorporates Indigenous Knowledge in decision making, expands co-stewardship with Tribes on National Forest System lands to better address Tribal needs, achieve forest management goals, and meet Forest Service trust responsibilities.

SUPPORT: Alternative B Relative to Alternatives C and D, that it provides more concrete direction for Tribal Inclusion by including outcomes for plan components as measurable objectives instead of goals, as they would be under Alternatives C and D.

SUPPORT: Alternative B attention to Forest Stewardship, Fire Resilience, Climate, Ecosystem Integrity, Carbon. SUPPORT: Economic Opportunities and Sustainable Communities, but economy beyond timber must definitely be acknowledged and included. "Acknowledge" appears to be in DEIS but the increase in timber production is definitely heightened and beyond FAC recommendations. Too high.

SUPPORT: Update of Forest Stewardship to address the contemporary need to conserve and recruit mature and old-growth forest conditions, restore ecosystem resilience to wildfire and other disturbance processes exacerbated by climate change, and provide a predictable supply of timber and other ecosystem goods and

services that support community sustainability. Recognizing that providing a "predictable supply" of timber is different than just increasing timber output which is part of what is proposed in the DEIS.

SUPPORT: Ongoing recognition that other ecosystem goods and services that support community sustainability are definitely significant.

SUPPORT: Attention, Inclusion of distinct plan direction for the differences between Moist and Dry forest, and applying that at the stand scale.SUPPORT: Improvement of forest structure, including Old-Growth characteristics, and creating more resilient ecosystems.

SUPPORT: Approaches to forest stewardship among the action Alternatives that vary in scale, intensity, and pace, with Alt B being the preferred.

SUPPORT: The Forest Service recognizing that wildland fire, including both wildfire and prescribed fires, plays a

critical ecological and cultural function in healthy forests, and that a primary desired condition under Alternative B across the NWFP area would be resilience to wildland fire.

SUPPORT: It is definitely recognized that the broad geography and multitude of environments across the NWFP area require that wildland fire be managed according to site- and circumstance-specific characteristics that always give attention to protection of people, property, and infrastructure.

SUPPORT: The address of Fire Resilience and prioritizing wildfire fire risk reduction in areas that affect communities and infrastructure; recognizing the contribution of non-forested areas (such as meadows and woodlands) to wildland fire resilience; and supporting the use of wildland fire as a management tool where appropriate.

SUPPORT: The inclusion of the reality and impacts of Climate Change and Carbon stewardship, and inclusion in project planning.

SUPPORT: Attention to protecting and sustaining the forest benefits of ecosystem services that are necessary to people and communities, local economies and ways of life, including Indigenous communities and ways of life. SUPPORT AGAIN: The recognition that supporting local job opportunities, businesses, and economies is not just timber and timber harvest, that forest restoration is beyond that. OKAY to improve restoration and resiliency consistency and reliability but not just INCREASE timber harvest.

SUPPORT: Ongoing recognition that other ecosystem goods and services that support community sustainability are definitely significant.

SUPPORT: Attention, Inclusion of distinct plan direction for the differences between Moist and Dry forest, and applying that at the stand scale.

SUPPORT: Improvement of forest structure, including Old-Growth characteristics, and creating more resilient ecosystems.

SUPPORT: Approaches to forest stewardship among the action Alternatives that vary in scale, intensity, and pace, with Alt B being the preferred.

SUPPORT: The Forest Service recognizing that wildland fire, including both wildfire and prescribed fires, plays a critical ecological and cultural function in healthy forests, and that the primary desired condition under Alternative B across the NWFP area would be resilience to wildland fire.

SUPPORT: It is definitely recognized that the broad geography and multitude of environments across the NWFP area require that wildland fire be managed according to site- and circumstance-specific characteristics that always give attention to protection of people, property, and infrastructure.

SUPPORT: The address of Fire Resilience and prioritizing wildfire fire risk reduction in areas that affect communities and infrastructure; while recognizing the contribution of non-forested areas (such as meadows and woodlands) to wildland fire resilience; and supporting the use of wildland fire as a management tool where appropriate.

SUPPORT: Alternative B would have greater public health benefits associated with Air Quality than the other Alternatives.

SUPPORT: The inclusion of the reality and impacts of Climate Change and Carbon stewardship, and inclusion in project planning.

SUPPORT: Attention to protecting and sustaining the forest benefits of ecosystem services that are necessary to people and communities, local economies and ways of life, including Indigenous communities and ways of life. SUPPORT, AGAIN: The recognition that supporting local job opportunities, businesses, and economies is not just timber and timber harvest, that forest restoration is beyond that. OKAY to improve restoration and resiliency consistency and reliability but not just INCREASE timber harvest.

SUPPORT: Economic outputs but a better option than just logging would be to increase jobs in recreation, forest management, prescribed burning, and other.

SUPPORT: Biological Resources to result in long-term benefits to habitat conditions for native plants and animals.

SUPPORT: That Alternative B includes protecting forest health but also increases direct forest products jobs with some emphasis on output from younger stands.

SUPPORT: - The addition from Alternative D that expands plan direction associated with the restoration of protected plants that are also important to Tribal culture.SUPPORT: The addition from Alternative D for additional

opportunities for Tribal co-stewardship and use.

SUPPORT: The addition from Alternative D for more Tribal input on post-disturbance management in areas that are culturally important to Tribes.

SUPPORT: Update of Forest Stewardship to address the contemporary need to conserve and recruit mature and Old-Growth forest conditions, restore ecosystem resilience to wildfire and other disturbance processes

exacerbated by Climate Change, and provide a predictable supply of timber and other ecosystem goods and services that support community sustainability - Providing that a "predictable supply" of timber is different than just increasing timber output which appears to have been done in DEIS.

SUPPORT: Inclusion from Alt C for Wildland fire and passive restoration with reduced focus on mechanical vegetation "treatments".

OPPOSE: Tree age threshold of 150 years. 120 or lower is supported.OPPOSE: Increased timber output. Timber output can be generally "predictable" without increasing.

## ALTERNATIVE C:

SUPPORT: The inclusion and emphasis of natural processes for forest management.

SUPPORT: The acknowledgement of (over)use of commercial timber logging for vegetation management and ecological restoration.

SUPPORT: Wildland fire and passive restoration with reduced focus on mechanical vegetation "treatments". OPPOSE: Deferring to ONLY the "natural processes", that have been much altered by the 100 years of fire suppression. And now climate change.

# ALTERNATIVE D:

SUPPORT: Alternative D responds to public comments supporting more flexibility in active forest restoration and wildfire risk reduction activities, and increased predictability of timber outputs, but the timber outputs are too high. SUPPORT: This alternative also responds to comments and recommendations to provide additional opportunities for Tribal co-stewardship and use.

SUPPORT: More flexibility in active forest restoration and wildfire risk reduction activities, if this is not just increasing logging.

SUPPORT: Additional opportunities for Tribal co-stewardship and use.

SUPPORT: Expanding plan direction associated with the restoration of protected plants that are also important to Tribal culture.

SUPPORT: More Tribal input on post-disturbance management in areas that are culturally important to Tribes. SUPPORT: Increased "predictability" of timber outputs, if this really is predictability and to stabilize timber economics rather than just increasing logging.

OPPOSE: Increased "predictability of timber outputs if this is just increased logging.

## ALL ALTERNATIVES:

SUPPORT: That the action Alternatives all include plan components that would strengthen the capacity of ecosystems in the NWFP area to adapt to the ongoing effects of Climate Change. Because climate change is anticipated to influence different forest types in different ways, the distinct plan direction that is proposed for Moist and Dry forest types would support different management activities appropriate to these different systems. SUPPORT: Plan direction for Climate Change distinguishing between Moist and Dry forests at the stand level during project planning that would enable adaptation to changed conditions.

SUPPORT: The proposed Alternatives providing direction to consider Climate Change vulnerability and adaptation in planning at the project level.

SUPPORT: The DEIS attention to Air Quality, and that it is the Alternatives effects on fire risks as well as their use of fire as a tool for management that provide the most substantial impacts to air quality.

SUPPORT: Sustainability of regional Communities but that it is important to include sustainability beyond timber harvest. Not just focus on timber harvest, when in our own local area and in other areas too, the sustainability of regional Communities is not just timber harvest. Forest Service job opportunities in local communities include recreation, land restoration, aquatic restoration, prescribed fire, and more. It is definitely of note that our local

Methow Valley economy has boomed since 1994, with strong roots in recreation and tourism.

SUPPORT: AGAIN AND AGAIN: Local jobs aren't just timber, in our local area, and in other areas too (which is supported by Google checking the comments for the DEIS online).SUPPORT: The action Alternatives include an objective to increase restoration treatments using ecological forestry methods while also conserving and protecting older trees and achieving desired conditions.

SUPPORT: Attention to local Economy when that attention includes Forest Service job opportunities in local communities that are recreation, restoration, aquatic restoration, prescribed fire, and more.

SUPPORT: The inclusion to the DEIS (This may have been included somewhere, but I didn't see it.) that healthy forests maintain water availability and contribute 50% or more of downstream water for drinking and irrigation in the PNW.

OPPOSE: Attention to Economy as timber jobs, when Forest Service job opportunities in local communities definitely include recreation, restoration, aquatic restoration, prescribed fire, and more.

OPPOSE: Increased age of trees to be logged, increasing from 80 years old on up to 150 or even more.