

Data Submitted (UTC 11): 3/14/2025 4:00:00 AM

First name: David

Last name: Barta

Organization:

Title:

Comments: Northwest Forest Plan Amendment Comments

Thank you for the opportunity to comment on this amendment to the NWFP. Getting this right is critical to the flora, fauna, and people of the region and the whole nation.

My name is Dave Barta. I have lived in Oregon and recreated in our public lands wilderness for 60 years. For the past seven years I have worked to repay the wilderness for all it has given me by volunteering as a field checker for Cascadia Wildlands, a Eugene, OR, based organization dedicated to the the preservation of the wildlife and wilderness of the region. Though I'm sure I support the comments that have been or will be submitted by Cascadia Wildlands, the comments I am submitting are my own and do not represent the organization.

As a field checker I have spent time exploring and documenting the conditions in virtually every Forest Service, BLM and ODF landscape plan, fire salvage project, and timber sale from Salem to Grants Pass and the Cascade crest to the coast. Doing that work I have learned some things first hand about how our forests are managed and particularly about their relationship with fire. In these comments I will first explain the things I've learned and their relevance to the NWFP amendment and then list some particular issues and approvals I have with the alternatives presented and details within them.

I wish to note that in the FS meeting on this project the presenter made very clear that comments should specifically reference particular sections in the proposal saying that is the only way they would be useful and implying that comments that don't do that would be essentially ignored. That is hogwash and a violation of the ethics and intent of the NEPA process. While I'm sure it would be easier for the FS if comments were submitted that way, it is unreasonable that anyone other than paid attorneys and scientists should have to read the entire document in order to comment. In fact, I have read the document and from that I know that reading the first 50 pages or so is sufficient to understand what is being proposed and comment on it intelligently. It is a lengthy and complex document that is heavily redundant for reasons that are probably necessary for scientific and legal rigor but unnecessary for public understanding of what's in it and intelligent and informed public comment. In my opinion, the comments of the presenter were designed to some degree to stifle public comment.

Things I have learned from inspecting timber projects and proposals:

- There is actually little to none unspoiled old growth that has not been impacted by the acts of man, particularly logging, plantation forestry methods, and fire suppression. Even as a conservationist it is often very difficult to look at a stand of forest and determine what is really best for the ecology and habitat potential. For that reason,

hard and fast rules are almost impossible to establish making the transparency and rigor of the NEPA process that much more important. Protecting that process and encouraging and promoting public access and comment are vitally important. To that end, proposed projects, particularly during the scoping process, should always be accompanied by publicly accessible georeferenced maps that are put on the website in such a way that it is simple to download them with georeferencing intact. Additionally, during the scoping process areas to be viewed must be accessible and not blocked by locked gates, often miles from the units in question. I have been told by FS NEPA managers that there's nothing they can do about locked gates because of road and right-of-way agreements with private land owners. That's ridiculous and is simply an excuse to limit public comment. The exception to that would be during extreme fire danger but find a middle ground!

- Particularly in checkerboard matrix there is either an ignorance or unwillingness to take the state of adjacent private lands into account when planning for actions on public land. For example, cumulative impact related to adjacent private land is not obviously mentioned or considered in this document. Because of the dramatic overharvesting and slack legal protection of habitat on private land, small pieces of public forest are routinely the only thing stitching pieces of reasonable habitat together such that they are useful to endangered and other species. Cumulative impact of timber projects on public land adjacent to private moonscape is routinely one of the most important objections to projects I find. Additionally, I have been told by managers of both FS and BLM forest that older trees must be removed to establish a sustainable stand age variety while ignoring the fact that there are zero older trees on adjacent or regional private lands. It should be possible to build more understanding and consideration of this issue into the NWFP Amendment.

- Old growth forests are resistant to fire and benefit from it. Virtually every old growth forest I have seen contains evidence of having survived fire(s), usually far in the past. But I have also seen old growth that survived very recent fires and it is amazing to see how the ladder fuel and weak understory has been cleared out without seriously damaging the old trees. To be fair, I have also seen late seral forest where a stand of old growth was probably wiped out by a catastrophic stand eliminating fire, but very rarely. Because it is so inherently resilient and also valuable as undisturbed habitat, old growth and most mature forests, particularly in LSR but also in HLB should not be treated. Because of the complexity of the forest due to human intervention, as I mentioned earlier, there are exceptions to this but when they occur they must be clearly called out in scoping and EA documents.

- The people who composed and compiled the original NWFP have made a big deal of how only scientists and forest managers who did not have a stake in getting out the harvest were involved in the division of land into LSR and HLB. My experience shows that is not entirely true. It is common to find dog hair second growth in LSR and a case can be justifiably made that some of that is necessary so that the young forest can be developed into diverse mature forest and provide geographic continuity between older stands. But the same can not be said for the stands of mature and old growth forest that were classified as HLB. There is no good reason for that and, while it is mildly uncommon, I see it frequently. There needs to be a method within the NWFP rules such that when old growth is found in a harvest on HLB it is not only automatically removed from the project but also permanently reclassified as LSR. If that means moving a piece of mistakenly classified dog hair plantation from LSR to HLB as compensation that isn't desirable but might be appropriate.

Specific comments on the amendment document:

- I am assuming that the final amendment will probably include items from Alternatives B, C, and D. However, on the chance that the final decision is to choose one alternative at the exclusion of the others, my preferred alternatives, in order of preference are C,B,A. Given that the system, particularly when private land is taken into account, is already rigged in favor of timber harvest, Alternative D is by far the worst.

- That said, there are several things common to all three alternatives (for purposes of this discussion, Alternative A is a nonstarter). The primary one is the inclusion of Native American culture, knowledge, and understanding of fire in the management process and the involvement of Native American land stewards in the decision process. I am fully in support of this in all alternatives to the maximum degree possible.

Additionally, all of the alternatives call for differentiating between wet and dry forest when considering treatment. Omitting this from the original NWFP was a mistake and is a good change.

In general, the amendment document recognizes the value of wildland fire as a management tool and that helping make the forest fire resilient enables that use of wildland fire. Included in that is the recognition that site and circumstance specific characteristics should be included that prioritize protection of people, property, and infrastructure. Within reason I support that prioritization of fire protection treatment and resources.

- Needs section, predictable timber supply - There is too much emphasis on creating a predictable supply of timber to support economic sustainability in communities. I understand why the forest worker living in a wilderness adjacent community would feel that way, but the reality is that the mills and private sector landowners have been overharvesting their woodlands for at least the last 40 years and reaping windfall profits for their owners while putting pressure on our public lands to make up the difference. This is wrong and unsustainable. I can accept this need so long as the predictable supply is set low enough that it is sustainable without gaming the system, but in my opinion it is given too much weight in the discussion.

- Needs section, carbon sequestration - The value of the forest as a major source of carbon sequestration is mentioned in the document and to its credit, the document does not try to make the case that cutting trees is better for carbon sequestration. However, despite the opinion of the nut jobs heading up the current administration in Washington, DC, human caused global warming is a real thing and carbon sequestration in our forests matters, particularly those in the NWFP area. There is no mention of carbon sequestration in the Needs section and it should be there.

- Specific problems with Alternatives B and D:

- Exception to Survey and Manage in hazardous fuels reduction efforts adjacent to communities - While it may be necessary to include the possibility of site specific exemption from managed species maintenance in hazardous fuels treatment around communities, eliminating survey requirements is simply being an Ostrich with its' head in the ground. We should know what we're doing, call it out in the proposals, and document fully.

- Hazardous fuels reduction area around communities - A quarter of a mile hazardous fuels reduction buffer around communities should be the maximum. Even in those areas, particularly where they are LSR, restoring and enhancing old growth characteristics should still be a priority.

- Commercial in LSR - Commercial thinning in LSR is prohibited in Alternative C but allowed in B and D. If a contractor is lucky enough to make some money on trees taken from a thinning in LSR then congratulations to them. But whenever the word "commercial" is used it changes the incentive from restoring habitat to making money and the gamesmanship begins. I recognize the desire to defray costs by calling for commercial thinning, but it encourages counterproductive planning and execution of actions that should be only for habitat and forest restoration.

- 80-120 year old stand age threshold change - The original NWFP restricted harvest and thinning of trees over 80 years old. I'm sure the flawed logic behind changing that, now 30 years later, is that those 80 year old trees are now 110 years old so that's where the threshold should be now. Aside from the fact that the math doesn't work it misses the point that, in both HLB and particularly in LSR we are trying to recreate natural sustainable succession. By changing the age to 120 years old that orderly process is broken, I can only assume for commercial purposes.

- Related to this, Alternatives B and D call for protections to harvest in HLB of stands established prior to 1905, which aligns with the 120 year old threshold. This should be 1945 to align with the extension of the 80 year old threshold. That said, there should be room for exceptions for gentle thinning for ecological resilience in stands 80-120 years old where they were replanted after a stand reducing even and not thinned. Such exceptions should be called out in the project proposal and well documented.

That said, with the exception just mentioned, existing mature and old growth forest should never be removed and should not be treated to promote resilience or non-forest habitat.

Things I like in Alternative B:

- Beavers - In the Biodiversity section, Alternative B calls for improved Beaver presence. Yes, the little builders are highly beneficial and wonderful to see as well.

- Restrict older stand Matrix harvest - Yes because those older stands should never have been in HLB/Matrix in the first place. Why not just make them LSR?

Good things particularly in Alternative C:

- Less commercial logging - "[hellip]employ more restrictive limits on the use of commercial logging for vegetation management and ecological restoration."

- Moist LSR only for LS habitat - "allowing moist LSR to be managed solely for late secessional habitat by removing exceptions to components that restrict harvest of mature and old growth stands, a prohibition on post-disturbance salvage in moist LSRs including desired conditions and guidelines that set a higher level of NSO habitat protection in dry LSRs[hellip]"

- 80 year stand age not 120 - "prohibit salvage harvest in moist LSR and timber harvest in stands over 80 years old."

- Early Seral treatment levels - "[hellip]less treatment in early seral forest." I generally support reliance on natural processes and elimination of salvage in Alternative C but recognize that some medium seral LSR will need treatment after years of fire suppression and improper or insufficient management.

Thank you for your extraordinary effort reviewing and proposing revisions to this valuable agreement. I hope the politics at play this moment do not overwhelm collaborative and thoughtful completion of this process. Good luck to us all and thank you for the opportunity to comment.