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Comments: Comment Submitted to the U.S. Forest Service

Re: Draft Environmental Impact Statement for Northwest Forest Plan Amendment #64745

Date: March 14, 2025

I want to thank the US Forest Service for receiving comments and for the effort made over a year to outreach and welcome community input on this important amendment. I also want to express my appreciation to the Forest Advisory Committee for reaching consensus in the form of Proposed Action Alternative B. After 30-years without amending the 1994 Northwest Forest Plan, theirs was not an easy task.

I am writing as a Portland resident who enjoys the opportunity to hike and interact with Nature in our public forest lands throughout USDA Region 6. Over five years, summer and winter, I participated in numerous wildlife survey outings in the Mt. Hood National Forest with Cascadia Wild, an organization that shares its data with the Oregon Department of Fish and Wildlife. I have also joined Bark on ground-truthing outings to USFS logging and treatment sites, this too in the Mt Hood National Forest. As an honored volunteer with the Johnson Creek Watershed Council, I take a special interest in watershed health and restoration projects.

To begin, let me state that I support a NFP Amendment that 1) prioritizes the mitigation of impacts incurred from climate disruption and global warming; 2) enhances clean water retention and availability for forests, wildlife and human communities; 3) promotes resilience to wildfires; and 4) grows healthy, mature forest ecosystems, not least of all for enhancing wildlife habitat and carbon storage capabilities. Our national forest lands are a valuable public resource and should be managed to serve the greatest public good in the way of meeting the most pressing challenges before us.

That said, I am opposed to the proposed actions in Alternative D and Proposed Action Alternative B that extend the logging of trees from greater than 80 years-old to greater than 120 years-old in moist forests and to greater than 150 years-old in dry forests. I also oppose the sheer number of acres that the DEIS makes available to logging over the next 10-15 years, a policy goal that will significantly impair younger forests from achieving maturity. Contrary then to prioritizing timber harvest, it is the ongoing creation and enhancement of mature and old growth forests that should be central to any Northwest Forest Amendment for a number of reasons:

1) Large, living trees and complex forests continue to provide the sort of carbon storage that is needed to enhance resiliency to climate change and global warming. Increased logging of old growth and mature forests should not be prioritized in any NFP unless it is 1) explicitly backed by evidence that substantiates carbon storage gain, and 2) is presented alongside an alternative action analysis for carbon storage that does not prioritize logging.

2) Increased thinning of and disturbance to canopy connectivity in older, complex, moist forests will only exacerbate the chance of fire ignition on exposed ground vegetation and increase exposure to wind events during longer, warmer, drier summer seasons. Increasing these treatments to attain prioritized timber harvest goals is thus not an ecologically-sound way to enhance fire resiliency, lighten the demands placed on already diminished ranks of firefighters, or protect human communities. Allowing moist forests to grow complexity and canopy connectivity should be the preferred policy for enhancing fire resiliency.

3) Increased thinning of and disturbance to canopy connectivity in older, complex forest ecosystems run counter to the spirit and design of the original NFP with regard to preserving habitat for imperiled, iconic and bellwether wildlife species. Citing past performance of habitat preservation and species protection under the original NFP

should not preclude an analysis of potential gains that could be made by an alternative action that prioritizes growing and enhancing mature, complex forests.

4)The goal of flexible and predictable timber harvests as prioritized in the DEIS could shortchange or fast track surveys of treatment applications and thus undermine best case environmental assessments regarding fire resilience, clean water, habitat loss, and species protection. The projected economic benefit that increased timber harvest could contribute to local communities should be analyzed and reassessed by addressing potential risks and losses - financial and environmental, short-term and long - that could result from wildfire, floods, lack of clean water availability, and downturns in tourist visitation that result from proposed increases in logging.

I am pleased that the DEIS calls for an increase in the use of prescribed burning for managing wildfires, also that Indigenous cultural burning is supported in all three of the action alternatives. That said, I also have some grave concerns about how this and other aspects of Indigenous co-stewardship will be effectively and equitably enacted to the full range of proposed circumstances as stated in the DEIS since 1) Indigenous cultural and ecological values may vary among the 80 plus tribes that will be party to the NFP Amendment; and 2) that a co-stewardship relationship between Indigenous people, their knowledge and culture, and the governmental designs and projects of the USFS remain asymmetrical for many reasons historical, political and ecological. In other words: Will Indigenous knowledge and applications thereof that originally served traditional, holistic, place-based designs - i.e., foraging, hunting, etc., be rendered secondary or falsely represented in the context of USFS projects and treatments that prioritize increased industrial logging?

Mind you, I do not speak for Indigenous people, nor am I anything but supportive of the fact that Indigenous inclusion is prominent in the NFP Amendment. As a person of non-Indigenous heritage, I defer respectfully and supportively to the Proposed Action Alternative B assessment as articulated by FireGeneration Collaborative Director Ryan Reed who served as Public Representative and Tribal Inclusion Co-Chair for the Northwest Forest Plan FAC. I merely wish to suggest that while the USFS has taken meaningful strides to respect Tribal Sovereignty and honor Treaty Rights toward a goal of establishing effective co-stewardship, the final NFP Amendment might do better to advance and guarantee Indigenous inclusion independently and not as part of any action alternative as is amply the case in Proposed Action Alternative B and Alternative D. After establishing such an independent guarantee of Indigenous inclusion for all tribes and bands in Region 6 as addressed by the DEIS, the USFS could then provide a more comprehensive and accurate analysis of how the NFP Amendment will impact and engage Indigenous communities living in or near their traditional homelands.

I will close simply by saying that I support a strong NFP Amendment that addresses the ecological challenges of our times and not one that prioritizes increases in timber harvest.