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Comments: Dear Sirs and Madams --

I appreciate the opportunity to comment on the proposed revisions to the NWFP. As I read and skim through your document, I find myself most concerned about the impacts of climate change. Living and recreating by the Willamette NF, I am personally familiar with the already occurring more erratic precipitation, drier hotter summers and increasing fires of increasing size that are forecast only to worsen in frequency and severity. I applaud the effort to build in more fire resilience.

However, I believe vegetation managements are over-valued in their efficacy in preventing and reducing wildfire severity. I have read in many sources that mechanical and prescribed fire treatments may benefit for only 5-7 years, 10 at most, as shrubs and ladder fuels regrow. And that the largest impact factor -- that often overwhelms treatment -- is wind.

Much money is spent on WUI treatments, when the money -- and ecology -- are better served by hardening homes and communities rather than providing false hopes of protection in fuel treatments. Let us not forget the Tillamook fire actually burned not once but several times because conditions were the issue of relevance. Nor to forget the lessons of the Eagle Creek fire in 2017 spotting a mile across the Columbia river into Washington; or two summers ago embers causing fires 2 1/2 miles to the east in Kelowna across Okanagan Lake in BC.

Particularly for moist LSOG forests, such as those that characterize the west central Oregon Cascades, treatment may be detrimental rather than beneficial. Treatments dry out the impacted area too much, and they often remove some of the largest and most fire resistant trees to offset costs of the treatment. These areas should be left alone. As I have examined impacts from the Willamette's Lookout Fire and Cedar Creeks Fire -- intact moister areas on north slopes and valleys were relatively resilient. The more scorched areas were south facing and ridge lines -- or during weather conditioned events, like the big run across the northern part of Waldo Lake in the Cedar Creek fire. The areas that we know do well against more destructive fire should not be tampered with. More truly at risk areas may well benefit, but such should be done in an adaptive management fashion, because there is no one size fits all program.

Treatments may balance out as less harmful to more beneficial in the predominantly drier eastern Oregon forests -- but once again, a lot depends on how selective the cutting and how much is removed before the forest is rendered into a facsimile of its prior state.

In a related comment, as a volunteer who spends a lot of time removing invasives from Eugene forest parklands and as a visitor to treated areas in National Forests, unless greater care is taken to cleanse the machinery used, these operations accelerate the spread of invasives and thereby degrade the forest eco-integrity.

I write these comments in full awareness that the new federal administration overseeing the Forest Service is mindlessly, perversely, and destructively anti-science. I am most sympathetic to the vise the Forest Service finds themselves in, having spent much time as a volunteer and recreationist interacting with USFS staff. The recent dishonest and cruel shearing of probationary staff stress an already understaffed service. There is no confidence that even a well-positioned revision will be executed responsibly under conditions in which the administration's position is that obvious climate change is not occurring and which is knee capping agencies so they cannot do their work well.

The upshot for me is to opt for Alternative A, as the least harmful alternative.

It is well known that timber companies often green wash with claims of forest resilience when the real objective is timber extraction. If staff are returned -- or augmented!-- so that there is sufficient forest service oversight -- and if climate resilience resumes as a real objective in management in the federal government, then Alternative C could become viable. I cannot support B or D, since they would cause more harm and less benefit than advertised.

Thank you, Erik Fisher