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Comments:

I'm writing again to comment specifically on alternative amendments. I am a rural forestland owner in Crow, Oregon.

* I originally wanted to choose Alternative A, No Action. The Northwest Forest Plan has done a lot over the last 30 years to protect older forests and to shift the forest agencies' emphasis to conservation as well as timber extraction. But the NWFP needs to be updated: to have more about protecting mature and old-growth forests, supporting biodiversity, preventing wildfires, and including tribes. Those elements could be added, I thought.

But then I read in the DEIS Summary of Alternatives, "...No changes would be made to 1994 NWFP related plan components unless done so at the unit-level during plan revision or through programmatic or project-specific plan amendments." (NWFP Amendment, DEIS Volume 2, Summary of Alternatives, page ES-3, Alternative A.) This is very misleading to the public, who are trying honestly to comment. Why even include Alternative A as an alternative if it's not a real alternative on the same footing as B, C, and D? If any changes are made with Alternative A, they would be made in small-scale ways and in ways that would be hard for people to inform themselves about.

* Since Alternative A was out, I thought maybe Alternative C would be a possibility, if more emphasis on protecting mature and old-growth forests and supporting biodiversity was added and there was less emphasis on timber production.

But I noticed a consistent bias against Alternative C in the DEIS in terms of fire resistance, with statements that Alternatives B and D (which are more destructive to forests and ecosystems) are far better at protecting against wildfires. This seems to me to be scare tactics, an attempt to get the public to choose Alternative B or D because virtually everyone is worried about wildfires.

One example of this is in NWFP & Amendment, Frequently Asked Questions and Fact Sheets, Spotlight on Alternatives: "Alternative C: Focus on maximum carbon stocks, though with risk of loss due to greater wildfire vulnerability."

Another example is in the DEIS Summary of Issues and Environmental Consequences, "Fire Resistance and Resilience." Some of paragraph 2 is confusing but it ends, "...this reduction in management areas would reduce fire resistance and ecosystem resilience, and [that] over all Alternative C would not improve fire resistance and ecosystem resilience, nor would it reduce wildfire risk to communities within the NWFP area compared to the No Action Alternative." (NWFP Amendment, DEIS Volume 2, Summary of Issues and Environmental Consequences, "Fire Resistance and Resilience," paragraph 2, page ES-8.)

Since Alternative C has more fire resistance and resilience actions in it than Alternative A, it doesn't make sense that it could provide less protection than Alternative A. I think this statement assumes that forests that have had "fuels treatments" are more resistant to fire than natural forests. However, there is strong evidence that older forests have greater natural resistance to wildfires than younger forests and fuels-treated forests.

Among three bad choices, B, C, and D, I would choose C if it had more emphasis on protecting mature and old-growth forests and supporting biodiversity and less emphasis on timber production. Alternative C is a more conservative approach to forest management, and I think this is wise, because some of the science the Forest Service is basing its decisions on is far from agreed upon, and when there is not a scientific agreement, it's much

better to go slowly than charge in and wreck ecosystems because your assumptions were wrong.

* Areas where there is not scientific agreement:

Does thinning forests protect them from wildfire?

Are old-growth forests more resistant to fire?

Do burned mature and old-growth trees continue to store carbon?

Is it a good idea to log in Late Successional Reserves to benefit early seral species?

* In all the alternatives, there is a near-total absence of detailed information about carbon sequestration and the role that mature and old-growth forests play in it, and how the amendments' work will relate to this. In a time of climate crisis, floods, droughts, wildfires, etc., when the role of older forests in storing carbon is widely acknowledged, in a DEIS largely about forests, this absence seems strange and self-destructive.

I tried to find more about carbon sequestration buried somewhere in the DEIS, but I didn't have much luck. One brief reference in the NWFP & Amendment, Frequently Asked Questions and Fact Sheets seemed promising. "Adapting to Changing Conditions: Carbon Stewardship: Moist forests: prioritize long-term carbon storage. Dry forests: Focus on stabilizing carbon stocks and reducing vulnerability to disturbances." That was all.

But then I read "Learn more about Adapting to Changing Conditions in the DEIS." "Volume 2, Appendix C: Climate and Carbon Management provides guidelines for managing carbon stock and stabilizing forest ecosystems." Unfortunately, DEIS Volume 2 Appendix C turned out to be a Biological Evaluation of Sensitive Species.

The one paragraph I did find about carbon sequestration is in NWFP Amendment, DEIS Volume 2, Appendix A1. Proposed Action. A1-28, Desired Conditions (CLIMATE-DC) item 06: "Forests and non-forested ecosystems in the plan area contribute to carbon stewardship, reflecting differences in ecosystem characteristics and fire regimes in dry and moist forests." The paragraph continues for several sentences, repeating the distinctions from the Fact Sheet in slightly greater detail.

That's all I could find. If this is really all there is, it is inadequate and irresponsible. There may be more I couldn't discover, but it was difficult and time-consuming to find even this much, and whatever there is should be readily accessible to the public.

Considering that the Forest Service and B.L.M. between them are theoretically taking care of the largest natural carbon reserves in North America, carbon sequestration needs to be a central part of any amendment, and the information about how the Forest Service will deal with our precious, carbon-storing forests needs to be clear and easily available.