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Comments: Hello, my name is Kaitlin Andersen. I am commenting on the NWFP Draft EIS as an environmental professional who has worked in natural resource management since 2022.

First, I would like to express my support for the Tribal Sovereignty and Inclusion components of the DEIS. These pieces have been separated throughout several DEIS alternatives, and I advocate for all the Tribal Sovereignty & Inclusion components in each alternative to be included in the final EIS. I strongly support increasing tribal/cultural burning, as well as prescribed burns. Tribes were excluded from any meaningful leadership in forest management in the original NWFP, and now is the time to rectify past mistakes. I appreciate USFS's work to include tribal leadership as an integral tenet for the new NWFP.

In terms of land management in the DEIS, I strongly disagree with the proposed amendment to increase the age of late successional reserves to allow for logging under the pretense of "fuels reduction" and "wildfire risk reduction." Logging does not reduce wildfire risk. In fact, logging creates drier, hotter, and windier conditions that increase wildfire severity. Scientific studies have shown that increased forest protection leads to lower severity fires in comparison to logged forests (Bradley et al. 2017). Additionally, most fires are caused by human ignition. According to the National Park Service, "Nearly 85 percent* of wildland fires in the United States are caused by humans. Human-caused fires result from campfires left unattended, the burning of debris, equipment use and malfunctions, negligently discarded cigarettes, and intentional acts of arson" (U.S. Department of the Interior 2022). Increasing logging/thinning will lead to more forest roads and ergo, more access points for human-caused ignitions and higher severity fires. The exact opposite result of your stated goal.

I also strongly disagree with Alternative D's proposal to eliminate rare species survey requirements prior to logging in certain areas. Logging is an extremely damaging activity - we need to know what species exist in an area before approving logging that could potentially destroy a population of rare flora or fauna.

Salvage logging in moist LSR's should also not be included in the final NWFP Amendment. Early seral forests are complex and highly beneficial habitats to many different species of wildlife. 264 professional scientists wrote an open letter to Congress in 2015 to object to more intense post-fire logging saying, "post-fire habitats created by fire, including patches of severe fire, are ecological treasures rather than ecological catastrophes, and that post-fire logging does far more harm than good to public forests" (DellaSala et al. 2015).

Additionally, I advocate for the protection of mature and old-growth forests located within Matrix lands.

While I understand the USFS is under pressure to maintain access for timber companies to harvest trees, management decisions should not be guided or swayed by timber interests. I urge the USFS to refer to unbiased scientific sources for their wide-reaching management decisions on the NWFP. The National Forests are public lands, not timber plots. Timber interests see dollar signs on trees to line their own pockets, most of which flows out of rural, disadvantaged communities into cities. We must remember that keeping trees alive and well in our forests means carbon sequestration, reduction in wildfire risk, habitat for thousands of wildlife species, and enjoyment for many generations to come.

Citations

Bradley, C. M., C. T. Hanson, and D. A. DellaSala. 2016. Does increased forest protection correspond to higher fire severity in frequent-fire forests of the western United States? *Ecosphere* 7(10): e01492. 10.1002/ecs2.1492

DellaSala, D. A. et al. 2015. Open Letter to U.S. Senators and President Obama from Scientists Concerned about Post-fire Logging and Clearcutting on National Forests. <https://johnmuirproject.org/wp-content/uploads/2015/09/Final2015ScientistLetterOpposingLoggingBills.pdf>

Hantson, S., Andela, N., Goulden, M.L. et al. Human-ignited fires result in more extreme fire behavior and ecosystem impacts. *Nat Commun* 13, 2717 (2022). <https://doi.org/10.1038/s41467-022-30030-2>

U.S. Department of the Interior. 2022. Wildfire causes and evaluations (U.S. National Park Service). National Parks Service. <https://www.nps.gov/articles/wildfire-causes-and-evaluation.htm>