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Comments: Draft comments NW Forest Plan EIS

My name is Jeffrey T. Olson, a retired forest economist with extensive experience with policy issues surrounding community economic development and sustainability in the United States, Asia and Africa. In the 1980s and 1990s, I was an economist and policy analyst with The Wilderness Society and in 1991 co-authored Federal Forests and Communities in the Pacific Northwest (title correction needed) with Michael Anderson. Subsequent to that publication, I served as a member of a working group to draft the National Research Council's Environmental Issues in Pacific Northwest Forest Management (2000) National Academies of Sciences, Engineering, and Medicine. 2000. Environmental Issues in Pacific Northwest Forest Management. Washington, DC: The National Academies Press. <https://doi.org/10.17226/4983>.

The revised Northwest Forest Plan draft environmental impact statement (DEIS) states that among its objectives is to ... "providing a predictable supply of timber to support the long-term sustainability of communities located proximate to National Forest system lands..". This objective is remarkably similar to "community stability" goal that was at the heart of the timber program managed by the Forest Service back in the late 1980s and early 1990s.

The idea of maintaining high levels of timber output to assure economic well-being unfortunately never proved true. While timber supply is important to the forest products industry, timber supply alone has never been the most important to employment levels or by extension community well-being. Over time, the forest products industry in the Pacific Northwest has worked to maintain its competitive edge by reducing the costs of manufacturing and increasing labor efficiency. This is noted in the DEIS (3-110). Other authors have also noted that employment in the industry (Chamlee et al. 2018, Donohugh and Haynes 2002).

While community stability is not stated as a goal for the DEIS, it is implied by the explicit emphasis on maintaining a stable and dependable supply of timber. In that context, it is surprising to see no mention of resilience in the context of the communities adjacent or contained within the boundaries of the Northwest Forest Plan region. Donohugh and Haynes (2020) conclude that "the issue from the perspective of sustainable forest management is the extent that these communities can adapt to the changing socioeconomic conditions associated with changes in both the outcomes of and approaches to forest management." They go on to observe that the need is for ... "forest management to meet societal needs and maintain and enhance long-term multiple socioeconomic benefits". In their words "this is a broader context than the enduring goal that forest management sustain a flow of timber and other benefits to promote the stability of forest industries and communities. In addition, there are the positive contributions to communities made by the forest management community itself contributing human capital necessary to building community capacity". It would seem that without specific consideration of the impact of the NW Forest Plan Revision on the resilience of its proposed actions on the resilience of adjacent communities and the components of social and economic well-being the DEIS is inadequate.