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First name: Llewyn

Last name: Whipps

Organization:

Title:

Comments: Hello and thank you for considering this comment in the NWFP amendment process. I am a restoration ecologist based in Corvallis, and I have spent much time on the Mt. Hood and Willamette National Forests working on riparian restoration, post-fire planting, and EDRR projects. I have also spent a lifetime recreating, mushrooming, and learning in the diverse ecosystems of Oregon's national forests. In all of these capacities, I am reminded of the need for nuance in forest management. The amendments to the Northwest Forest Plan could be a chance to build more nuance into the regulations, but in the DEIS I see many concerning proposals that would inhibit our ability to choose the right actions in the right places.

Across the alternatives, the proposed amendments would weaken protections for older forests, clean water, and wildlife habitat. If enacted, these changes would significantly increase logging levels across our public forests, open mature and old-growth trees to commercial logging, and sideline the protections that communities, wildlife, and ecosystems depend on. Preserving biodiversity and connected wildlife habitat across the region should be a core principle of this forest plan amendment. The amendment should also recognize the wide variety of social and economic benefits national forests provide for local communities and the region as a whole - not just timber, but also clean water, climate stability, quality of life, and outdoor recreation opportunities.

While I do support some thinning to increase fire resiliency and bring stands back toward historic compositions, I strongly disagree with a large-scale increase in logging in the name of fuels reduction. While there are many overstocked, single-aged stands on national forest land that could benefit from thinning, I have seen a worrying number of timber sales that use the language of fuels reduction or restoration to commercially log stands with mature, diverse and open canopies. Commercial logging for fuel reduction can negatively impact wildlife habitat, remove large fire-resistant trees, introduce invasive species, and create hazardous fire conditions. In addition, the results of regeneration harvest, heavy thinning, and other intensive prescriptions do not create the same early seral conditions that fire, landslides, or other disturbances do. The spread of invasive species through equipment and roads, soil compaction, and large slash piles left behind cannot be used by wildlife in the same way as natural early seral habitat.

In the final EIS, I'd like to see specific standards to ensure that fuels reduction is both needed and effective before logging is prescribed. In fire-adapted systems, fuels reduction should also be coupled with underburning to create long-term resiliency, including both prescribed fire and indigenous cultural burning. Without follow-up fire in these systems, which often does not occur even if it is recommended, treated areas are likely to quickly grow brushier, and increase fire risk.

I support the amendments in alternative B to focus fuels reduction and wildfire response on acres near communities. In more remote areas, wildfire can be used to help restore the fire regime and diversity of stand types. Using wildfire as a tool would free up limited resources for managing for fire where it matters culturally and economically. Alongside wildfire, I also support decreasing the barriers to use cultural and prescribed fire.

While I support increasing flexibility for restoration and fire resiliency as in alternatives B and D, I am concerned about increasing the age class of LSRs. There are already exceptions to be able to perform restoration work in LSRs, and the jump from 80 to 120 years would open up areas to commercial logging that were set aside as LSR in the original plan. This could potentially impact critical habitat for Northern spotted owls and other old-growth dependent species. I strongly advocate for no loss of LSR land.

I also support standards that protect older forests in matrix zones. Where they still exist, these stands should not be utilized for commercial timber.

Finally, I support the efforts at tribal inclusion made in alternatives B and D. I urge the Forest Service to retain all the Tribal inclusion plan components analyzed in the DEIS. I support elements of the proposed amendments that include a beneficial fire approach and support of Indigenous cultural burning and co-stewardship agreements.

With tribal inclusion, a larger focus on restoration and return to historic forest types and fire regimes, increasing activities to reintroduce and restore conditions for beaver, an amended NWFP could greatly help the region's ecosystems and communities. I encourage the Forest Service to embrace its multi-use mission and look beyond timber quantity, to retain all tribal inclusion components from all alternatives, and to clarify the meaning of ecological forestry in the amendment process. This would create a plan that is truly sustainable both economically and ecologically.