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Comments: To whom it may concern at the USFS and beyond:

Thanks for this opportunity to comment on the Northwest Forest Plan Amendment #64745 -- this is part 1 of my unique comments. (I signed a group comment earlier today and may have signed another in the past few weeks.)

Unfortunately, all 5 Subcommittees of the federal Advisory Committee appear to have been cleverly chosen in order to act like these 5 important matters / themes are more or less being adequately addressed in the Draft EIS - even though actually no action alternative adequately addresses any of these. It appears that the subcom.s were chosen for p.r. value, rather than due to actual interest in maintaining let alone recovering listed species.

There is also some cleverness included with pretending like any (let alone all) of the offered alternatives truly address the "over 100 federally-listed species that will need to be addressed for the amendment." Just because the agencies are mandated to "consult" on species issues does not mean that there is more focus on protecting the NSO or any other of these over 100 species on the ground, air, or trees of the 17 national forests within the range of the Northern Spotted Owl in Washington, western Oregon, and northern California.

While there are some quite good aspects in regards to TRIBAL INCLUSION within this DEIS for the Northwest Forest Plan Amendment, yet this important and basic aspect is not a component of Alt. C - which otherwise is the best action alternative offered as long as salvage logging is prohibited and as long as older trees are left where they are so that resistance to fire is not lowered in order to make logging smaller trees "worth their while".

Certain efforts here and there toward integrating tribal knowledge, cultural practices, and advice / co-stewardship into the DEIS did not achieve such "integration" since such was entirely omitted from Alternative C! Please make sure that such is a component of Alternative C in the final EIS.

It appears that timber industry attorneys have connived with USDA officials in order to maximize timber industry profit in the short-term (and perhaps mid-term) - while using the lingo developed over the last 35 years to make excuses in order to log the commercially-valuable larger conifer trees and chomp through other areas in the name of "biomass energy."

Will recent Executive Orders by the new Trump Adm. necessitate a supplemental Draft EIS in order for the a new Northwest Forest Plan to move forward, and might the USDA develop another alternative that increases logging of older forests even more than the outrageous proposal to log 800,000 additional acres of these older forests (?) - and overall this is claimed to help species but it will clearly hurt their habitat and increase fire danger all-in-all.

There are various judicial cases relating to Musk firing USDA and USDol employees - it is my understanding that some biologists who count NSOs have been laid off. I proclaim that if the land mgt agencies do not care enough to keep current employees who may actually care about listed species, then the timber industry with USDA in tow are clearly relying on no science or bad/junk science, and thus you would have no alternative but to choose the No Action Alternative. Do you consider it "balance" to keep timber managers and fellers, but fire those who care about living organisms on our public lands?

I find a # of things disturbing in the sentence on the USFS press release of 11-14-24 under Fire Resilience: "This includes the use of hazardous fuels treatments, like mechanical thinning and prescribed fire to reduce dense vegetation to lower wildfire risk and impacts on communities, critical infrastructure, and forests, while maintaining

and improving overall forest health across the landscape." Need an excuse to log large commercial conifers? Call it "hazardous fuels treatment". What is often claimed to be hazardous fuels treatment is just an excuse to take valuable trees to the mill -- especially if it involves older conifer trees. "Mechanical thinning" appears to be purposefully vague -- since such could include both chainsawing as well as the feller-bunching machines which proceed along cutting and grabbing smaller trees. Such small trees could be good to remove, but try to assure that the machines don't harm sensitive soils. No variety of mechanical thinning should occur in ancient forests / late-successional reserves / mature forests, so please account for this perspective when you designate a chosen alternative for the Final EIS which hopefully includes "tribal inclusion" and not just in a token sense.

The current older forested areas within the NWF Plan are a lot healthier than they will be under any action alternative unless Alternative C is significantly improved to prohibit salvage logging and logging of older trees. The No Action Alternative sounds superior to the action alternatives for connectivity for species such as Pacific fisher, and also has implications due to increased clearcuts and "edge" effect near marbled murrelet habitat which could increase the number of corvids in the region which would be likely to reduce the murrelet population even further by dining on its eggs, chicks, and occasionally adults.

While it is nice to mention that your land management is partially guided due to care for communities, but if people haven't learned anything in the last few decades, it is that logging of older forests in the vicinity of communities is a recipe for wildfire disaster -- but hey, then they could lobby to salvage-log some adjacent areas and repeat the cycle.

Also, the new fed'l adm. has banned so many words -- does that mean that no one in the USDA can utter or write words like "climate", "tribal", or "cultural heritage" in a future document related to a new Northwest Forest Plan? What if laws require those words to be discussed? Would sub-contractors and/or USDA employees be banned from writing the 199 words in a future USDA document? If some of those banned words like tribal or climate were used anyway, it would be to simply add marks on a checklist to make it appear that they are acting responsibly toward tribes and toward climate even though there are numerous harmful land management activities proposed under all alternatives.

Please clarify what may have happened to the 2012 Planning Rule and Executive Order which was part of the basis relating to updating the Northwest Forest Plan, and how you can possibly reconcile the documents if the new era is one of censoring even the words "tribal", "women", and "climate"? Unfortunately, with the exclusion of certain tribal inclusion and prescribed fire proposals, the new NWFP goes in the wrong direction -- all relating to that historic theme that timber managers and land managers love to take large trees to the mill (no matter what the implications are for species, water, climate, etc.).

But if the USDA still plans to proceed relating to the new Northwest Forest Plan, then it would take quite a Supplemental DEIS to clarify alternatives. And then if you come out with a Supplemental Draft EIS with fairly similar alternatives, I would hope that either Alternative C would need to be greatly improved to disallow salvage logging or logging of older trees and include inclusion of wise indigenous caretakers/advisors, or else choose Alternative A -- the No Action Alternative.

What will the impacts be on anadromous salmonids and amphibians from the erosion/siltation relating to the proposed increase in logging and road-building under the action alternatives of this DEIS? Are there current plans to use herbicides in any or all of these 17 nat'l forests(?), and please include any update in relation to herbicide use in the final NWF Plan Amendment because the aforementioned as well as other species are very sensitive to toxic herbicide formulations which would need to be analyzed, accounted for, and either mitigated or realize cannot be mitigated so just don't use such materials.

Also the argument that increasing timber production will make communities more resilient economically or to fire are tending to forget that there tends to be the boom/bust cycle in relation to timber -- while ever-increasing

automation including for the dirty (yet claimed-to-be-clean) biomass energy will be putting people out of work as quickly as some "log, baby, log" companies and agency may be hiring. So much for the claimed resilience both to fire and to economic woes. And remember that some rural communities which are gateways to public lands like to keep areas scenic and keep watercourses fishable -- consider this in economic considerations for some communities within the NWF Plan area in the supplemental and final documents.

The excessive logging under the action alternatives will reduce landscape connectivity -- please consider things more site-specifically than think you can wisely manage on the landscape level. So either greatly improve Alternative C in a Supplemental Draft and Final EIS (with improvements advised earlier in this comment), or else choose the No Action Alternative since our sensitive forest ecosystems will not be able to tolerate the levels of abuse under the guise of doing something helpful called for in the action alternatives of the Northwest Forest Plan Amendment.

Thank you for your consideration.

Sincerely yours,

Bruce Campbell