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First name: Katherine

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Organization:

Title:

Comments: Dear USFS and USDA,

I am writing to express my strong opposition to the proposed proposed action alternatives (B, C, and D) to the Northwest Forest Plan (NWFP), particularly Alternative B, which would significantly increase logging in Late-Successional Reserves (LSRs) and Matrix lands, which weakens protections for mature and old-growth forests, resulting in severe harm to my property, community, and personal livelihood.

I am a full-time resident of Multnomah County, Oregon, which includes tens of thousands of acres of National Forest and Wilderness areas, and abuts hundreds of thousands more-including Mt. Hood National Forest, the Columbia River Gorge Scenic Area, the Gifford Pinchot National Forest, and Willamette National Forest. Moreover, as the seat of the primary airport serving this region, the economic health of Multnomah County and its residents relies upon a steady flow of tourists who travel to our region specifically to pursue outdoor recreation-an aspect of our economy that relies directly upon the accessibility of our unique mature and old growth forests and their unique ecosystems.

Public access to old growth forests, and the healthy, intact ecosystems that rely upon them, are the very reason that I choose to live in the Pacific Northwest. I have spent the last 13 years recreating extensively-hiking, camping, and leading outdoor group excursions-in National Forests across Oregon, Washington, and Northern California. I have developed a direct and immutable interest in the public lands affected by potential changes to the Northwest Forest Plan, and it is obvious that these lands and the ecosystems on top of them are a priceless heritage for all Americans.

The proposed plan would open up our local forest land-including mature forests up to 120 years old-to increased logging. This would degrade the very landscapes I use and enjoy, not only diminishing their biodiversity, scenic value, and ecological integrity, but damaging a primary draw for tourism and economic benefit to our region.

As noted in *Summers v. Earth Island Institute*, injury-in-fact is established when a plaintiff demonstrates a concrete and particularized harm that affects their ability to enjoy public lands?. My ability to continue recreating in these forests-healthy and intact-would be directly harmed by increased timber harvests and habitat destruction.

The Draft Environmental Impact Statement (DEIS) states that logging would double from 2023 levels, affecting 2.65 million acres per decade?.

This increase in logging will:

- Destroy mature and old-growth habitat critical for ESA-listed species in my area like the northern spotted owl and marbled murrelet.
- Increase fire risks and degrade climate resilience, counteracting the Forest Service's own climate adaptation goals. Old growth forests fare remarkably well during wildfires (see Anvil Fire) compared to second-growth or plantation forests. Logging in our regional forests would increase airflow and reduce shade and soil moisture during our lengthening dry seasons, creating increased fire conditions.
- Fragment and degrade our region's watersheds which provide clean water for our communities' use and habitat for riverine and riparian populations.
- Degrade the drinking water quality of our region.

Under *Lujan v. Defenders of Wildlife*, causation is met when the injury is fairly traceable to the agency's actions?. Here, the proposed amendments explicitly authorize increased logging, removing prior protections and allowing timber extraction in areas I use. These changes directly lead to the degradation of the forests I rely on for

recreation and environmental benefits.

The courts have ruled that agencies must consider a reasonable range of alternatives under NEPA, and when they fail to do so, legal challenges can force them to reassess their decisions (Summers v. Earth Island Institute)?.

The good news is the Forest Service has a clear legal path to prevent these harms by:

- Retaining and strengthening protections for old-growth and mature forests in the NWFP.
- Rejecting alternatives that increase logging in LSRs and moist forests.
- Fully accounting for climate impacts and carbon sequestration in its decision-making.
- Upholding ESA protections for threatened and endangered species.
- Ensuring Tribal co-management is not contingent upon expanded logging, allowing true stewardship that prioritizes cultural and ecological restoration, including cultural burning.

A legal challenge could force the agency to revisit its flawed environmental analysis and prevent implementation of logging increases. As established in Massachusetts v. EPA, procedural violations that undermine statutory environmental protections provide grounds for judicial intervention?. By rejecting the proposed rollback of protections, the Forest Service can avoid unnecessary litigation and fulfill its obligation to conserve these forests for future generations.

The forests of the Pacific Northwest are a national treasure, not a timber supply. The state of Oregon is already a top U.S. producer of both softwood lumber and plywood, producing 6.1 billion board-feet annually. That means the state of Oregon is already a leader in the nation's timber supply under the current NWFP. Increased logging is uncalled for. These mature and old-growth landscapes provide irreplaceable benefits-clean water, biodiversity, carbon storage, and outdoor recreation opportunities-that far outweigh short-term timber gains for private industry.

I urge the Forest Service to reject any alternative that increases logging in mature and old-growth forests and to honor the conservation commitments of the NWFP. Protecting these forests is not just an environmental necessity, but a legal obligation.

Thank you for your consideration,
Katherine (Kat) Kocurek