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First name: MATTHEW

Last name: HOLTGREVE

Organization:

Title:

Comments: Dear USFS and USDA,

I am writing to express my sincere opposition to 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 lies at the doorstep to hundreds of thousands of acres of National Forest and Wilderness areas. I have spent the last two decades recreating extensively - hiking, camping, amateur naturalism, and adventuring - in National Forests across Oregon, Washington, Idaho, and Montana. I have developed a direct and immutable interest in the public lands affected by potential changes to the Northwest Forest Plan.

Many times each year I venture alone, with my family or friends, and with guests to the magnificent valleys, peaks, and waterways of the Mt. Hood National Forest, Willamette Valley National Forest, Deschutes National Forest, Columbia River Gorge National Scenic Area and the various wilderness areas contained therein. Without a doubt, these public lands and the healthy, intact ecosystems upon them are an invaluable part of my life, liberty, and pursuit of happiness - they are the very reason I live where I do. These national treasures are a well-known draw for adventure- and eco-tourism, and each year many American and international visitors come to marvel at these trophies of long-view natural conservation. 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, diminishing their biodiversity, scenic value, and ecological integrity.

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?.

Oregon already produces 6.1 billion board-feet annually and is a leader in the nation under the current NWFP. Increased logging is uncalled for. Expanded logging would have the following negative impacts on me and my community:

Fragmentation and degradation of watersheds that support wild fish runs. I rely on a healthy fish population for food and recreation.

Increased fire risks. Old growth forests fare remarkably well during wildfires (see Anvil Fire) compared to second-growth or plantation forests. Logging in our area would increase airflow and reduce shade and soil moisture during our lengthening dry seasons, creating increased fire conditions.

Damage or destroy rare and mature habitat that is central to eco-recreation and home to endangered species.

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 excellent news is that there is a manner in which the Forest Service can prevent these harms to myself, the public lands I rely on, alongside millions of other Americans.

Retain and strengthen protections for mature and old-growth forests in the NWFP and agency policies.

Reject alternatives that would increase logging in mature and moist forests.

Uphold ESA protections for our rare and fascinating animal neighbors.

Ensure that Tribal co-management is not contingent upon increased logging. Allow tribes to exercise genuine stewardship that prioritizes ecological restoration, such as through cultural burning to manage fuel loads.

Adopt standards that would prohibit the practice of clear-cutting during timber sales.

Adopt standards that would prohibit monocultural plantation reforestation following timber sales. Require thinned areas to be replanted using species that represent the original biodiversity of species in the timber sale area.

I encourage you to slow down and reject the proposed rollback of protections for America's treasured national forests. A legal challenge could be costly to the agency and prevent implementation of harmful changes such as increased logging. As established by *Massachusetts v. EPA*, procedural violations that undermine statutory environmental protections (NEPA, EPA, CWA, etc.) provide grounds for judicial intervention. The Forest Service should

take measures to avoid unnecessary litigation and fulfill its obligation to conserve these lands and forests on top of them for future generations.

The forests of Oregon and the broader 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. 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,

Matthew Holtgreve

IN-TEXT CITATION: Summers v. Earth Island Institute