

Data Submitted (UTC 11): 3/18/2025 3:01:46 AM

First name: Anthony

Last name: Giorgi

Organization:

Title:

Comments: To Whom It May Concern,

I am submitting this comment on the Draft Environmental Impact Statement (DEIS) for the Northwest Forest Plan (NWFP) Amendment as a concerned citizen and longtime user of our national forests. I live in Gleneden Beach, Oregon and am deeply connected to the landscapes of the Pacific Northwest and specifically the Siuslaw and Willamette National Forests. I am an avid forager, backpacker, fisherman, and advocate for ecological stewardship, with a strong commitment to preserving the integrity of our public lands for future generations. I personally spend over 80 days per year in the Siuslaw National Forest and Willamette National Forest, depending on these landscapes for recreation, wildlife observation, and personal well-being. These forests are more than just a place for recreation; they are essential to my identity, and spirituality. The proposed revisions to the NWFP will have direct and lasting impacts on my ability-and that of future generations-to continue these traditions, and as such, I have legal standing to challenge the plan should it fail to adequately protect these vital landscapes.

The Northwest Forest Plan has played a critical role in restoring forests and watersheds that were severely degraded by past logging and road-building, helping recover economically and ecologically valuable salmon runs, protecting old-growth forests, sustaining biodiversity, and ensuring that National Forests remain a key natural climate solution. Critical thresholds, monitoring, and scientific evaluation was established by the Northwest Forest Plan- weakening these protections, standards, and monitoring efforts would set back decades of progress. The DEIS must recognize and incorporate wet and rainforest life zones into its management framework, considering Plant Association Zones and Mean Annual Increment metrics at the scale of entire national forests rather than on a stand-by-stand basis. These forests, particularly within the Siuslaw and Willamette National Forests, support some of the most productive ecosystems on Earth, with immense carbon sequestration potential and biodiversity value. Their inclusion in a mapped and scientifically driven management approach is necessary to prevent arbitrary decisions that could undermine long-term forest health.

Furthermore, the DEIS must fully acknowledge the role of these forests in carbon sequestration and biomass accumulation. Studies have shown that Pacific Northwest forests store more carbon per hectare than almost any other ecosystem globally, particularly old-growth and mature stands. Logging and road expansion not only emits carbon, but also releases stored carbon and disrupts ecosystem integrity, diminishing these forests' ability to act as climate stabilizers. Federal protections should emphasize the preservation of existing carbon stocks and the restoration of degraded landscapes. Protecting mature and old-growth trees is essential for confronting both the climate and biodiversity crises. These forests safeguard biodiversity and climate refugia, reduce flood and erosion risks, and provide clean drinking water for communities struggling with drought impacts.

A comprehensive ecological assessment of past forest removals in all national forests and a careful evaluation of timber targets of the Siuslaw and Willamette National Forests is also imperative. Historical clearcutting and subsequent plantation-style thinning have had long-term impacts on hydrology, soil stability, and biodiversity. Recent research highlights the link between past forest management and reduced summer streamflows, a critical factor affecting salmon populations and overall watershed health. The DEIS must address these kinds of cumulative effects more seriously and propose solutions that prioritize ecosystem recovery.

The Forest Service must prioritize Tribal sovereignty and environmental justice in its decision-making process. The Northwest Forest Plan spans the territories of more than 80 Tribal nations, yet many Tribes lack the resources and capacity to fully engage in federal decision-making processes. The agency must ensure equitable access for all Tribes, not just those with dedicated staff. The DEIS should incorporate policies that promote

cultural use, co-stewardship agreements, fire stewardship, workforce development, and youth education. Indigenous-led fire stewardship, including cultural burning, should be fully integrated into management strategies, recognizing that fire suppression has significantly altered landscapes. The Forest Service must honor its trust responsibilities and uphold Tribal treaty rights through a formal commitment to co-management and long-term engagement with Tribal communities. The agency should retain the Tribal sovereignty and environmental justice components that are in Alternative B. These issues are not mutually exclusive from the need to protect old growth and mature forest habitats and biodiversity and as such should be separated in a single alternative that improves forest protection measures.

The proposed NWFP amendment weakens protections for our region's forests, clean water, and wildlife habitat. If enacted, these changes could significantly increase logging levels, threatening mature and old-growth forests. The Forest Service should not weaken protections but instead expand forest reserves to recruit more habitat, protect streams, and enhance carbon storage. The amendment should recognize the broad social and economic benefits of National Forests, including clean water, climate stability, outdoor recreation, and quality of life, not just timber production. Economic analysis that ignores the perpetual role of ecosystem services while prioritizing one economic sector over another should be carefully scrutinized.

Fire is a natural and necessary process in forest ecosystems, yet federal policy has long prioritized fire exclusion and aggressive suppression tactics that degrade mature and old-growth forests. The DEIS must support beneficial fire use, including Indigenous-led fire programs and prescribed burning. Federal resources should be directed toward expanding Tribal fire management programs and eliminating bureaucratic barriers that prevent cultural burns. Mature and old-growth forests are degraded by conventional firefighting operations, which often involve bulldozers, chemical retardants, and high-intensity back-burns. Instead, proactive prescribed burning should be prioritized as a tool for ecological resilience and fire adaptation. Fuel and fire management should focus on the home ignition zone, non-commercial treatments, and beneficial fire use, not commercial logging, which can negatively impact wildlife habitat and increase fire risks.

#### What I Am Asking the Forest Service to Do

Rather than selecting one of the existing proposed alternatives, I urge the Forest Service to strengthen the Northwest Forest Plan by:

Expanding protections for mature and old-growth forests, ensuring they remain off-limits to commercial logging.

Maintaining and expanding the network of forest reserves to allow natural processes to flourish, protect imperiled species, and ensure habitat connectivity.

Prioritizing Tribal sovereignty and co-stewardship agreements, ensuring that Indigenous Knowledge is fully integrated into forest management practices.

Restoring degraded landscapes through restoration and protection of critical habitat, including stronger watershed protections for salmon and other sensitive species such as Marbled Murrelets, Spotted Owls, Torrent Salamanders, Red Tree Voles, and other species in decline.

Shifting wildfire strategies toward proven prevention measures, including home hardening and prescribed burning, rather than increasing logging under questionable scientific principles, such as the guise of fuel reduction.

Improving public access to forests by investing in road maintenance and infrastructure that supports non-extractive recreational activities.

The proposed changes to the NWFP must prioritize climate resilience, ecological integrity, and public access. I endorse the Coast Range Association's (CRA) comments on the DEIS and urge the Forest Service to incorporate

their recommendations in full. If the final plan fails to address these critical issues, I reserve the right to challenge it through all available legal and administrative avenues.

-Anthony Giorgi