

Data Submitted (UTC 11): 3/18/2025 3:53:08 AM

First name: Willow

Last name: Kasner

Organization:

Title:

Comments: Hello and thank you for reading and considering my Public Comments on the NWFP DEIS. they are a compilation of my notes, and so may be sporadic.

NWFP DEIS must address CRA's points 1, 5, 6, 9, 11, 12 and 14 from below.

CRA's point 14 is particularly important, as loosing any more Siuslaw NF native-forest is unacceptable and wrong.

1. Recognize and incorporate wet and rainforest life zones, coupled with Plant Association Zones and Mean Annual Increment metrics into a revised set of mapped forest management zones. This effort is not something to be accomplished at the stand or project level where arbitrary and capricious decision will occur, but at the landscape scale based on best available science.

2. Recognize, incorporate and celebrate the world class growth and accumulation of forest biomass, including above ground carbon, for all moist, wet and rainforest areas of the NWFP region.

3. Ecologically assess past forest removals from the SNF and all national forests. This includes clearcutting from 1945 to 1995 and plantation thinning from 1995 to today.

Recent science, such as research on vapor pressure deficit, low summer stream flows and fire refugia are not discussed in the DEIS.

*For example, low stream flows due to a warming climate gets noted in the DEIS, but low summer stream flow due to past forest management goes unmentioned.

4. For moist, wet and rainforests, I applaud the DEIS Option-B's general position on fuel load and industrial wildfire use. We support the DEIS approach of not using fuel load CRA -Page 3 reduction- a totally unwarranted strategy for moist, wet and rainforest zones.

5. Consult relevant tribes for appropriate fire use in wet and rainforest life zones.

Indigenous cultural practices, knowledge and science must be included in all public land stewardship and management planning moving forward. Each of the 4 Alternatives must reflect all inclusion language from DEIS Alt B & D.

5a If this DEIS is shelved or postponed due to current administrative & political stressors/threats, then we strongly suggest a continuation of tribal inclusion and consultation moving forward in any direction. Without it being officially added to an updated forest management plan, should not weaken its framework's validity, or the Forest Service and public's commitment to it. We cannot correct the past, but there is absolutely no way you should continue on without a commitment to help usher in a better present and future.

6. We are now at "code red" on planet Earth. Humanity is unequivocally facing a climate emergency. I applaud the inclusion of climate issues in the DEIS.

However, the DEIS's analysis is dated and not current to real world conditions and the scale of destructive events.

7. Future climate conditions will likely arrive sooner than DEIS's climate discussion suggests. Please read the three citations in the Coast Range Association's comments on climate warming events racing ahead of climate

model predictions.

8. DEIS Alternative B topics are severely remiss addressing wet and rainforest zones of the Siuslaw National Forest:

8a. Forest Stewardship: Fire resistance, not resilience, must be the goal of forest management in the Siuslaw National Forest.

8.b Fire Resilience: Is appropriate for human communities. Home hardening, not forest management for fuel reduction, is the path to human community resilience.

8.c Climate: Is not one among many issues- it is THE issue for NWFP forest management. Please re-read the set of scientists' warnings to humanity.

Also it was stated in USDA & OSU Climate forests study that if Oregon Washington, and Idaho leave their trees to mature, years of excess carbon would be absorbed.

And so, once again, climate and the fact that it's been repeatedly studied, shown, proven, agreed upon, and discussed around most kitchens even by now- that the TWO actions needed immediately to curb the quickly spiraling THE ISSUE. If there is no more clean water, air or living conditions for us, what good would the tiny profit percentage of the timber sales do us??

8.d Ecosystem Integrity: Wet and rainforest temperate ecosystem integrity is not supported by commercial timber removal and extensive road networks.

Non-commercial selective light thinning when needed, and Non-commercial plantation thinning (minimum canopy cover of 70%) and underplanting are warranted.

8.e Carbon: * World class sequestration of atmospheric CO₂ is a natural outcome of proper forest stewardship when managing for wildfire resistance and ecosystem integrity.

*(Read that again please.) This is especially true for the Siuslaw National Forest.

The DEIS MUST prioritize Carbon sequestration and storage ABOVE ALL ELSE.

(our live coastal conifer trees start at full potential around 80 yrs of age and can continue for hundreds of years- even after death in a old forest, as they feed new life-nurse logs, etc)

9. The DEIS must be seriously revised for wet and rainforest life zones and incorporate wildfire refugia science for wildfire resistant forest management.

10. DEIS must base forest thinning on wildfire resistance and the retention and build-up of sequestered carbon for the Siuslaw National Forest's wet and rainforest life zones.

11. Forest thinning for all moist, wet and rainforest forests must maintain at least 70% canopy cover post-thinning. 70% or more forest canopy is necessary for wildfire resistance

(CRA - Page 4, in wildfire refugia management strategies.)

12. Commercial forest thinning must be replaced by Forest Service budget funded selective non-commercial thinning. (Or from a Forest Service advocate organization).

This is the ONLY way to get way to get Big Power/Money influences out of our forest wildfire management plans! We need to be managing to save forests and the planet- not to produce yet more sales for them to make quick returns on, while not caring at all that our homes and lives are more destroyed with each passing year that they are allowed to iso strongly influence an agency as important as the Forest Service. A major separation of these Big Money/industry/wall street/billionaires from our land management decisions is imperative, for true management plans dot be made and carried out for the benefit of the whole.

13. Supportive infrastructure for Siuslaw National Forest dispersed recreational activities and public enjoyment must be part of the DEIS. The public must feel welcomed and able to visit the interior areas of the Siuslaw National Forest.

For example, currently the Siuslaw NF road system is not recommended for non-high riding vehicles.

14. We applaud the Forest Service for maintaining Late Successional Reserve areas.

However, we strenuously oppose future commercial timber harvest as a management practice in LSRs. *The harvest of naturally regenerated stands in LSRs within the Siuslaw National Forest, no matter what age, will engender vigorous public opposition.

*Alt B's proposal to harvest stands in LSRs up to 119 years of age is a dead-in-the-water idea and wrong forest management.

REFERENCE TO WHAT A LARGE MAJORITY OF NWFP RESIDENTS AGREE UPON

*The Importance of Old-Growth and Mature Forests: Mature and old-growth forests are natural carbon-storing champions, resilient against wildfire, and critical to mitigating climate change. Logging them would worsen the biodiversity and climate crises.

*Wildlife Habitat and Clean Water: These forests provide essential habitat for imperiled species like the northern spotted owl, marbled murrelet, and coho salmon. They also filter and protect drinking water for communities across the Pacific Northwest.

*Forest Reserves Are Vital: The Forest Service should strengthen or expand protections for forest reserves under the Northwest Forest Plan to recruit more habitat, protect streams, and enhance carbon storage-not reduce them or open them to logging.

* Support Tribal Sovereignty and Environmental Justice: Management decisions should reflect Tribal stewardship practices, uphold sovereignty, and ensure meaningful consultation and engagement with Tribal communities. (Pairing these components with the Forest Service's plan for weakened environmental protections (ALT D) is unacceptable.

For 30 years, the Northwest Forest Plan has safeguarded wildlife, clean water, and carbon storage...Dont let it loose any of those qualities now after 30 years of work and dedication!

The proposed changes prioritize commercial logging over ecological health, climate action, and community safety- and THIS must be reversed!

-Logging MOG forests clearly and blatantly undermines efforts to address the climate & extinction crises. These forests are natural climate solutions, fire-resilient, create and store water... (See SNF notes) and critical habitats for wildlife.

The USForest Service must:

*Strengthen protections for mature and old-growth forests to ensure habitat, water quality, and carbon storage, and recruit more mature and old forests to restore a functional ecosystem.

*Maintain or expand protections for the network of forest reserves to allow natural processes to flourish, ensure connectivity for wildlife, and support the recovery of imperiled species.

Any reduction in forest reserve protections would increase harmful impacts such as habitat destruction, sediment in streams, and carbon loss, further endangering sensitive ecosystems.

*Genuinely consult with Tribes, respect their sovereignty, and provide resources to support their full participation in decision-making. The Forest Service must support co-stewardship agreements, cultural burning practices, first food harvesting, and youth education while ensuring equitable access to planning processes In ALL alternatives, and final plans or lack thereof.

*Address environmental justice by analyzing impacts on air, water, and communities and ensuring fair, sustainable working conditions.

*Shift wildfire strategies to prioritize community safety and proven prevention measures over logging.

*The Forest Service must reject plans to weaken core protections of the Northwest Forest Plan. *Maintaining and expanding protection for forest reserves is critical to preserving biodiversity, clean water, and the long-term climate benefits our forests provide.

*We demand strong conservation protections not found in the DEIS that preserve the ecological, cultural, and climate values of the Pacific Northwest's Forests.

***Expansion on my main issues of coastal wet forest/rainforest, community economy, wildfire-harvest false narrative, and above all else- Climate, and climate forests:

1. Majority of coastal people do not want the big trees cut. Our communities have repeatedly shown that they want the priorities of these forests to be made for a healthy habitable future. Including clean abundant watersheds, foraging and recreation, tribal first foods, medicines and cultural uses, biodiversity, wildlife, and an intact healthy ecosystem for future generations.

And everyone, no matter where they may come from, all agree that prioritizing health for the waterways is a top priority for the salmon that have been- and still are - at the roots of our communities.

2. Economically, timber means little to the coastal economy. Big industrial timber companies and huge mill owners destroyed our local logging economy before the 80,s or timber wars. They pushed far too heavy of timber extractions, harvesting the local mill workers and loggers out of their jobs. And then, small logging families could not compete for the little that was left over. These same huge mill bosses and the like are the characters that decided to pit local working families against environmental or forest advocates. And yes, it was a very conscious decision on their end. Being of a generational logging family myself, I have heard the stories. It has been the rising powers of the Timber Giants that have been feeding false education and science to the masses for decades. (Maybe closer to a century.)

2a. If the agency wishes to help local forested communities, then any timber sales need to be given to local small logging companies. And they collective movement towards taxing big timber more heavily, and giving the tax breaks to our local Logging families and Forest workers instead.

Stop selling any of our raw unmilled timber overseas! Timber harvested here within our counties, should have the profits stay here within the counties.

2b. And if more lumber is needed as some say, then the plantations already under active management, should be planted with varying species of trees and their cohabitating native plans and shrubs, and left in a much longer rotation- so that they can grow in a healthy environment and actually reach their potential as strong healthy trees. These trees, in turn, make strong quality lumber. This high quality lumber is worth a better price, and with a better yield.

This creates truly sustainable harvests and a thriving local economy.

*Without these changes mentioned, we local rural citizens, continue to gain nothing- yet lose everything from their extraction and exploitation. This is unacceptable.

3. The forest is naturally more fire resistant if left intact. In the event of massive weather scenarios, they have and will burn, but those are very few and far between here.

If any thinning needs to happen in order to allow the stand to gain more old growth qualities, those individual trees should be taken down by hand with a chainsaw, and used in a nearby creek or other needed habitat.

Monetary value must be left out of the equation in order to assure any any needed specific light thinning are for the greater good of the forest.

3a. Heavy thinning and timber projects open the canopy, negating the in-tact forest's ability to utilize the marine

layer, fog drip and other evapotranspiration phenomena to create its own moisture & internal wet climate. It disrupts and often destroys the soil and massive underground mycelium network, above ground accumulation of saturated biomass water storage, deplete the water table- storage and creating capacity, and ultimately cause drying out the forest.

This will turn our moist/wet cool forest into a dry warmer one, thus negating the whole point of wildfire mitigation. It will turn the parts of the forest that are fireproof into fire prone.

3b. Wildfire mitigation strategies like fire-break road clearing are not appropriate.

Prioritizing mature and older stands for the recruitment of old growth is.

Keeping the moisture capturing abilities of these forests and the water tables intact, along with the wet under story and water logged decaying big wood, is.

4. The Siuslaw is one of the two greatest carbon forests in the world per acre, and the forest should be dedicated to carbon sequestration and storage.

After the age of 80 or so, our coastal Doug Fir, Spruce and others, enter into being "climate superstars." They capture and store more as they age than any young plantations could ever accomplish in their short lifetimes. As a matter of fact, tree farm plantations are a carbon

Siuslaw is mostly comprised of (maturing) natural stands, and plantations. Because we have very little old growth left, these remaining mature stands are our next old growth- which are needed in a multitude of ways.

With the agency considering changing the age from 80 to 120 years old for mature tree & stand protection is preposterous.

This means that stands protected for over 30 years under the NWFP suddenly no longer fit in the category that they have been in, a.k.a. "Mature"; and would now be harvestable in certain areas.

This is not what is needed, wanted, nor best for the community or the planet as a whole. Viewing the Forest (and other valuable natural resources) as primarily a commodity is what got us into this mess in the first place. Here are the coast, we are very aware that these forests and our nearshore connected ecosystems hold the keys to our sustainably and health.

No trees or tree stands over 80 years old should be harvested for monetary gain. New better protections should be added for these remaining stands in the matrix as well as in the LSR's.

This is a very unique forest and ecosystem, and the NWFP is the only reason why it was not completely decimated already!

The Siuslaw must be respected and valued for what it is- one of the most bio diverse and ecologically relevant places on earth!

Where the forest meets the sea is a true wonder, and must be revered as such- with all fighting together to protect it -despite the greedy pockets of capitalism and big corporate timber.

The American people have shown repeatedly that they want these natural areas being conserved with a priority of recruitment of new old growth, maintaining biodiversity for wildlife, first foods and medicine, native species, foraging, recreation, and to support a healthy ecosystem and planet for our communities and the generations to come.

Please listen to us now.

*Without leaving these mature or older Forests, we will have no old growth.

*Without old growth, we will have even more severe biodiversity extinction, and far less water, and a massive depletion of healthy growable living soil.

*Without these things, we have a dying planet.

*Without a healthy planet, we have no future.

"When all of the food and trees are gone, only then we will realize that we cannot eat money."

*Our rural coastal communities are aware, engaged, and activated in the protection of the mature stands of Climate Forest that we have left here!

*We prioritize habitat restoration, recruitment of old growth Forest qualities-along with the multitude of co-benefits that go along with maturing and old in tact forests- like restored water table and retention, cool, moist and shady temperatures, wild fire resistance and also recreational uses in our Forests, far above meeting Government, Agency, or industry pushed board feet extraction goals!

There is absolutely zero standing for an outside powerful or overseeing entity to decide that we, as citizens with human rights, must endure based on what their accounting or planning books state. We live, drink, and breathe here. We raise our families here, and we utilize the various natural benefits of the forests daily.

*If ANYONE is to take trees out commercially, it should ONLY be LOCALS. Our local logging families can no longer afford to compete with these huge companies and their insanely unjust corporate tax breaks. REITS, that now own a majority of our industrial timber lands, homesites, houses, and much more- are basically set up to avoid taxes, and are kicking regular residents or of their homes, jobs and forests!

*If Federal management plans continue to allow the same (or more) extraction from our small coastal rural towns (including the present regular plantation harvesting) then there MUST be new rules created for local Small logging companies to get hired for the work! Selling to the highest bidder, and accepting outsider companies to do this work, not only continues to kill our local economy, but it also allows people to work within our Forest that don't care about the future of the ecosystem like locals do! And yes, we have seen the carelessness and heard stories of trees being removed that shouldn't have.

*Which brings me to another point: More insight is needed by the Forest Service if outside companies are given the timber sale- to assure their adherence to conservation values, riparian zones, road and slope debris, runoff and inadvertent destruction to the areas, and overall quality and adhesion to the original agreed upon plan, (Mentioning this because as we all know, the USFS is generally far under budgeted, besides just un-maintained public access roads (as mentioned in CRA's main points of concern) thinnings, wildfire breaks and old sales can take years to clean up, with piles of left over peeled logs in stacks, in the thinning area itself, untended slash piles, dry invasive plants taking over the landings and more cleared near road areas, etc

IMPORTANT NOTE: Because I am 5th generation and live here now as well, alongside my remaining family- some of which are still loggers and farmers- I am focusing more on the Siuslaw National Forest mainly-since no other organizations are besides Coast Range Association(CRA) that I've found.

I incorporate though reference the full array of Coast Range Association's comments on the DEIS, and urge the agency to fully consider each of their points and comments. CRA has done over 30 years of extensive studies and research on the Coast Range area, and the Siuslaw, and is an expert in the field. I also recommend that the agency, US Forest Service, consults with them for future management strategy planning. (their contact info can be found in their official comment submission to you.

My final comments on the IMPORTANCE & OUTCOME OF CLIMATE as THE MAIN ISSUE.

The NWFP management area's natural in-tact maturing and older Forests are internationally recognized and prized for their amazing ability to absorb and store atmospheric carbon, and can assist in returning a climate-carbon balance after a century of destruction caused by the start of the Industrial Revolution.

Likewise, if allowed to instead be harvested-along with the accompanying forest integrity losses, they would help push our planet further toward an industrial/extraction excessive-carbon caused demise.

The future of our children and grandchildren is at stake here. What we do right now, this decade, will determine the quality of habitability for our planet and much of its population.

Right here, in the Pacific NW, with 9 of the 10 highest carbon storing Forests being managed within the NW Forest Plan area, we have the unique opportunity to help safeguard and assure a future for our grandchildren, JUST by PRIORITIZING PROTECTION for our local zone's climate forests!

By guiding the stewardship protections as they mature to create more much needed old-growth habitat, we will also coincidentally be supporting the creation of more wet cool forest temperatures, shaded mixed age canopies with native vegetation, damp soil with a living underground network and recovered water table retention, able to release some back to the forest in the dry months. All of these co-benefits also naturally increase wildfire resistance along with the old-growth being more resistant & resilient themselves.

Thank you for your time and consideration of this comment and the points made here within. I apologize it did not make it into a completed letter format in time. I also have about 20 forest visit documentations with photos that I did not have the chance to upload. However I will state that we have hundreds and hundreds of community members actively engaged in measuring and documenting our great Siuslaw NF for its protection for our future.

Sincerely,

Willow Kasner of S.Beavercreek, Siuslaw National Forest
