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First name: DJ

Last name: Fletcher

Organization:

Title:

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Jacque Buchanan, PNW Regional Forester

Jennifer Eberlein, PSW Regional Forester

USDA Forest Service Pacific Northwest Region

1220 SW 3rd Ave.

Portland, OR 97204

RE: COMMENTS ON NORTHWEST FOREST PLAN AMENDMENT DEIS (#64745)

Dear Regional Foresters Buchanan and Eberlein:

Thank you for the opportunity to comment on the USDA Forest Service Northwest Forest Plan (NWFP) Amendment DEIS, Project #64745. I reside in Forest Service Region 6 (R6), and I have studied the NWFP Amendment and the original 1994 NWFP via diverse sources, including presentations by Forest Service personnel and field trips in the Klamath-Siskiyou and Shasta-Trinity regions, and recreation in national forests from the Olympic Peninsula to Rogue River-Siskiyou and south to Mendocino.

I participated in 1990s' NWFP rural R5 community groups -- which included locals from timber dependent communities, regional tribal members, environmentalists, interested citizens and stakeholders, official representatives from federal agencies like USFS Shasta-Trinity and Six Rivers, and officials from federal and state Fish and Wildlife agencies. I thereby experienced the "timber wars" firsthand. It was not simply a conflict between economic and ecological objectives; there were many more perspectives and power struggles at play. But my main interest has always been forest stewardship that emphasizes conservation and applies ecological principles.

In recalling the complexity of issues brought to bear during the making of the 1994 NWFP, I acknowledge that current issues are more complex and challenging because of climate pressure and catastrophic wildfire. But the same intellectual challenge exists: to truly understand what is best for our forests, and to be fair to the issues, requires a huge breadth of knowledge as well as on-the-ground experience. It takes multidisciplinary knowledge in the hard sciences and as well as in the socio-economics and challenges of rural communities and all communities at an urban interface. Also, in my opinion, collaborative bodies of decision-makers who, together, possess such knowledge should have firsthand knowledge of the specific forest and watershed that is being managed.

I want to share a sample of actual 1993 comments I saved from "everyday" rural people at a meeting in the NW California (FS R5) Trinity River basin, mostly from timber-dependent towns, about what they hoped would come of the 1994 NWFP in the future:

A community in an environment that promotes health and well being around its citizens;

Restore watershed to healthy conditions so that native gene pools of anadromous fish and other old growth dependent life forms are flourishing;

Management of those resources in accordance with the informed good judgment of local citizens and [thus] relatively free of litigation;

Healthy forests producing producing lumber and other resources in balance with all resources;

Timber harvest levels below the biological ability of the forest to grow trees;

Community consensus to protect, restore, and manage all our natural resources on a truly sustainable basis;

Interconnecting old growth forest habitat;

Goal to have state and federal regulations regarding our [Trinity] county resources and how they are utilized reduced by 50%;

Many people will be engaged in resource related activities which have as yet been untapped;

We will have recognized thru analysis and experimentation how to live in harmony as part of a healthy natural environment.

These comments could be from 2025, not 1993. The big difference is that today's commenters from R5 and R6 either have experienced devastating wildfires or else fear that they soon will. Back in the early 1990s, our present-day era of catastrophic wildfire was still just a warning sounded by those who knew what the decades of wildlands fire suppression was leading up to.

In 2025, my own main concern about forest management is still about how we as a society will advance forest stewardship and uphold ecological principles, but also now it is about how we will do so while mitigating catastrophic fire and, at the same time, conserving every bit of forest as a "carbon sink" in order to mitigate climate change.

Increased timber harvest is not a "fix" for forest management or fire risk

I ask everyone to reject the sweeping argument that Americans who fight for conservation are to blame for ever-more devastating wildfires, insect infestations, and diseased forests because of legal obstructions to thinning and prescribed burning. Conservationists, environmentalists, naturalists -- whatever one calls the societal factions fighting for forest preservation and better understanding of fire regimes -- did not invent the top-down federalist approach nor design the federal legislative framework that has not fulfilled its promise of applying best practices in forest management on public lands.

Also, one must reject any argument saying that an increase of timber harvesting on public lands is a strategy to "fix" our forests. (I use the term "fix" here to draw attention to the misleadingly-named 2025 "Fix Our Forests" Act.) We need our forests as carbon sinks, and we need to expand protection of their natural processes and ecosystems. One can hope to see "fixes" begin to emerge from collaborative processes like the NWFP Amendment and other initiatives that push forward debate and discussion by bringing together expertise from federal and state agents, community leaders, tribal members, and informed local lay-people and stakeholders. But to have a true "fix" for the future, we need "Firewise communities" (ASAP) and alternatives to traditional new-timber-building. The use of recycled wood in the building industry must be expanded, and research into alternative building materials must be supported at universities and the private sector.

Concerns about the contravening of the NWFP Amendment process

In regard to the future of the NWFP and 2025 Amendment process, I join with many informed citizens in expressing concern about how Federal Executive Order 14225 of March 1, 2025 (90 FR 11365), "Immediate Expansion of American Timber Production," jeopardizes the NWFP and its updating process. By calling for timber

production increases beyond the NWFP Amendment objectives, EO 14225 (1) contravenes the NWFP Amendment process, likely negating its Proposed Actions and Alternatives as agreed upon by the reportedly now-disbanded Federal Advisory Committee; and (2) goes against the explicit legal agreement that underpins the NWFP Amendment DEIS process -- as would be the case with any DEIS process, which includes public review and comment period -- and thereby should require a new or supplemental DEIS with a new period for public comment.

Likewise, in addition to concerns about EO 14225, the misleadingly-named 2025 "Fix Our Forests" Act (in the 119th U.S. Congress as H.B.471), if passed, would further derail proposed actions under the NWFP Amendment. It would weaken decades of forest protections by, for example, granting many categorical exclusions from NEPA; delaying NEPA reviews until after project completions; shortening time periods for community objections from 6 years to 120 days; limiting consultation requirements concerning threatened and endangered species; limiting litigation involving "fireshed management projects"; and failing to provide standards for protecting old-growth forests. While it might sound good that the bill would direct USFS and USGS "to jointly establish an interagency Fireshed Center that is responsible for duties related to assessing and predicting fire" in an effort to "reduce" wildfire, the real purpose of the bill is to "expedite the review of certain forest management projects under the National Environmental Policy Act (NEPA) of 1969 and exempt certain activities from NEPA review. . . ." In other words, the bill is just one more top-down, waving-at-windmills approach to "fixing" something that cannot be remedied by an anti-conservationist vote in the U.S. Congress.

Apparently we are witnessing a new era of federalist conflict in "forest politics" that favors the power of our national government. The new federal directives clearly violate NEPA and the NWFP update process. They are about exploiting timber for profit. And they use the public fear of forest fire as a rationale for increasing timber harvesting. Such invalid arguments they wield. Designating "firesheds" and cutting down forests will not stop catastrophic fires -- as survivors of the January 2025 Southern California fires can attest.

In any case, in the decades since the original NWFP was adopted, challenges from climate change and shrinking biodiversity have intensified to the point of making the protection and recruitment of mature and old-growth forests critical and the wise use of prescribed fire and "firewise" practices essential. . . . Once those forests and those homes are gone, they are gone forever.

This is the time to maintain forests as invaluable carbon sinks to help mitigate climate change; to increase funding for bringing fire back to the forests and hardening communities; to educate communities and property owners about being firewise; and to enable USFS scientists along with state and local experts to study and document fire regimes, watershed-by-watershed, then to be empowered to apply forest management and fuels reduction remedies according to forest type at the stand level, especially in areas closest to communities potentially at high fire-risk.

Clearly, the biggest alarm bells I want to sound are about the consequences if federal-level mandates derail the NWFP Amendment and, also, if Americans do not find the political will to move government into an era of forest conservation from a bottom-up stewardship regime -- one which should include USFS scientists. We must reduce wildfire impacts by calling for ecologically-sound forest management and wildfire-risk reduction. We must become educated in and funded in fire resilience at the community, home, and ecosystem levels. We must "fire harden" our communities and homes. And we must maximize the climate resilience benefits of preserving forests as carbon sinks; after all, forests protected from logging can sequester up to five times as much carbon as tree-planting does.

Changes in organizational structure and collaboration offer a way forward

I note that USDA Forest Service Chief Tom Schultz's 2018 essay "Cooperative Federalism, Serving the Public Interest: A Policy Analysis of How the States Can Engage Local Stakeholders and Federal Land Managers to

Improve the Management of the National Forests" (in 193 Million Acres: Toward a Healthier and More Resilient US Forest Service, S. Wilent, ed.), was not about calling for the gutting of NEPA or the ESA, but rather for the decentralization of the Forest Service's organizational structure. I applaud the Chief's point that USFS decision-making about public lands must shift away from Washington and return to District Rangers who can foster collaboration among local stakeholders, community members, public-safety experts like fire marshals, tribal members, and state and local officials.

I am not suggesting that anti-federalist thinking is some kind of panacea for best future forest preservation and management or wildfire mitigation. But, while I know that federal power has historically sometimes served as the leveling-agent in terms of environmental protections and justice, also I know that what kills the benefits of federal power is when federal-level decisions override invaluable state and/or local insights -- for example, when it comes to the wealth of knowledge about forests and wildfire available from affected communities (not to mention how clearcutting policies have significantly altered forests and degraded fire-adapted ecosystems). To address the threat of wildfire, the agency has focused on increased logging across national forests. Logging fire-resilient mature and old-growth trees, though, is counter-productive to protecting communities and restoring fire to the landscape.

We do not want federal decisions that negate the NWFP Amendment and instead call for increased timber harvesting on public lands. And we conservationists do not agree with the January 2022 strategy for the next 10 years unveiled by Randy Moore, then-head of the USDA Forest Service, for "confronting America's wildfire crisis through increased logging . . . Nationwide, the plan calls for 'forest health treatments' on an additional 50 million acres of forest land over the next 10 years; that is twice the current levels of timber harvest. . . ."

We do need Forest Service forest-science experts going forward, but also we do need funding support for a more bottom-up strategy to manage forests. And we desperately need the USFS experts to aid in forest-level fire resilience and human community-level wildfire hardening to maximize these carbon sinks as a major antidote to climate change.

Regarding Proposed NWFP Amendment and Action Alternatives

Regarding my response to the "Forest Stewardship" component offered in the NWFP Amendment under the Proposed Alternatives:

* I believe that the USFS should expand protections for the network of PNW forest reserves to allow natural processes to flourish and to ensure connectivity for wildlife -- which includes preventing any reduction in forest reserve protections that would increase harmful impacts such as carbon loss, habitat destruction, endangerment of sensitive forest ecosystems, and unjudicious use of prescribed burning, salvage logging, or hazard fuels reduction.

* I oppose elements of the NWFP Amendment that would expand commercial logging in mature and old-growth forests across the Pacific Northwest.

* I do not support a "predictable supply of timber" from public lands. Promote legislation that helps local timber harvesters move away from timber sales and into the future of building homes from recycled wood and non-wood materials.

* I want to see forest management decisions according to forest type and scale, including by differentiating between dry vs. moist. Greater clarity and specificity are needed in plan components intended to identify an ecologically appropriate treatment within moist and dry forest stands that vary from the surrounding biophysical environment and fire regimes at landscapes scales.

* I advocate for revisiting the "age of allowed harvesting." I agree with those calling for protections for extant old trees, regardless of size, to retain existing old trees and old forests, promote recruitment of future old forest structure, and facilitate conservation as an imperative for maintaining American forests as needed source of carbon sequestration.

* I oppose the use of salvage logging as a blanket post-fire remedy.

* I would like to see fuel-reduction work designated close to home, by those who know the landscape.

* I defer my judgment regarding specific Forest Stewardship statements and objectives in the Amendment Alternatives to experts who have submitted comments. Particularly, I respectfully refer your attention to the "NWFP DEIS Comments" PDF submitted to you from Klamath Forest Alliance and Applegate Siskiyou Alliance, submitted electronically by Luke Ruediger on 27 February 2025.

Regarding my response to the "Fire Resilience" component in the NWFP Amendment:

* I would like to see inter-agency directives at the federal level for the USFS to work with NFPA and other agencies and groups on Firewise objectives.

* I believe there should be involvement at all levels, including tribal nations, in decision-making about use of prescribed fire to prevent catastrophic wildland fires.

* I suggest there be funding for initiatives like Firewise communities.

* I support the importance of natural fire regimes, including most of those practiced by tribal nations in R6 and R5.

* I urge the establishment of funding ASAP for community-level wildlands fire-resilience "hardening" and defensible-space clearing, and avenues for funding individual-level home-hardening for wildfire resilience.

Sincerely,
DJ Fletcher
Central Point, Oregon

[Text submitted electronically via USDA Forest Service public comment portal at
<https://cara.fs2c.usda.gov/Public/CommentInput?Project=64745>]