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Pacific Northwest Region

Pacific Southwest Region

U.S. Forest Service

U.S. Forest Service

1220 SW 3rd Avenue

1323 Club Drive

Portland, OR 97204

Vallejo, CA 94592

Re: Northwest Forest Plan Amendment Draft Environmental Impact Statement

Dear Esteemed Foresters:

As a:

1. 6.5', 72yo, White male, born and raised in privilege;
2. A critic of the hyperbole of both "environmentalists" and "timber beasts" when advocating for or defending their demands for policies and their promulgations;
3. For a decade (circa 1990s) a highly sought public participant by the USFS
4. Being able to point to where every one of my comments on the National Fire Plan were incorporated into it.
5. Chosen, due to my encyclopedic grasp of it, to be a keynote speaker at a 3-day, WNF, internal workshop on evaluating the Willamette NF Plan for performance and updating;
6. The only non-agency participant in several multiple-agency meetings/conferences. Including several by invite only.
7. Co-author of the first (and maybe still the only) citizen-scientist Alternative proposed as public comment on a USFS DEIS, to be fully analyzed in its Final EIS;
8. The author of an analysis of the USFS 5100 (Fire) Codes and their implementation in the 15 years since their last significant amendment at that time (hint: not one shred of compliance) that caused waves through the agency;
9. Sole author (although incorporating sought-feedback from agency specialists) of the W.A.R.N.E.R. Proposal (a landscape level fire-process RNA, coining the term "Fireshed");
10. The instigator and co-designer (with the Willamette National Forest) of an unprecedented Wildfire Symposium of top fire scientists from all over Region 6 in the mid 1990's;
11. The second chairman of the then (circa 2012) nascent Southern Oregon Prescribed Fire Network, asked to stay on for another two terms by the 5 other members, who, among them, had over 150 years of wildland fire management experience;
12. I declare that I have the research, analysis, intelligence, intuition, and predictive foresight chops for standing and to be taken seriously and assumed that I am likely to be correct when it comes to wildland fire matters, most often initially, but always after considering feedback and ferreting out and digesting other additional information.

I hereby submit to you:

Let me first get this out of the way.

As a resident of Southwestern Oregon for now 14 years, I agree with all of the region-specific positions with regard to the failures of and needs of the Northwest Forest Plan Amendment Draft Environmental Impact Statement Draft Amendment to the Northwest Forest Plan ("Draft Amendment", or "DA") that have been put forward to you by the Applegate Siskiyou Alliance.

So I am not here to re-lobby those. Nor have I taken the time away from my numerous "family" rescues to read the DA myself.

I am here to make an over-and-under-arching argument for the entire Region (although it applies geographically even much wider) for you to hopefully have in your mind as you digest other public comments.

Yes, the Pacific Northwest Forest Plan ("Plan") failed to result in saving the Northern Spotted Owl ("Owls") from population decline vectoring towards extinction. But that was NOT because of faulty environmental analysis. It does NOT mean that the scale and pace of logging on federal lands should, instead, have been allowed to continue. It does NOT mean that, had such logging continued, the timber industry would be in better shape today, or that lessening the restrictions of the Plan today will result in its salvation (and even more certainly, not in its resurgence to its former "glory"), or that local timber industry jobs and the rural lifeways that it once manifested and powered would return.

Quite the opposite, in fact. On all counts.

Even before the Plan was made, the timber industry, itself, in its decadal (circa 1979) meeting to take stock and make projections for itself, the collapse of the federal timber supply powering the Northwest timber industry had been self-predicted - due to the unsustainable pace of Old Growth logging on Federal lands (for a variety of factors, NONE of them regulation nor any imagined legislative restrictions. Just simple, straightforward, operational and market factors.) But, did they therefore plan to re-tool, re-image, or otherwise re-pace its character? Did they announce it to the press and their workers? Did they plan and design easing their workforces and their rural communities into different means of livelihood?

All together now:

Fuhk no. "Full speed ahead, damn the torpedoes."

Why? Because it never was about what was best for the forests, the general population, nor anything else other than rich getting richer. Logging for them was just another means of making money, with which to make even more money - for themselves. When one well slows down, move the money into another commodity, ad infinitum. It is still so.

I have a T-shirt from those days, purchased in a saw shop where I took my chainsaws to be serviced. It has a painting on it of a planet, covered with tree stumps, with space ships orbiting it, tugging barges of logs. Across the top, the caption reads: "Earth First!" Across the bottom: "We'll log the other planets later!" It had been a hot seller - there was only one left, and in my size. (I have kept it as a collector's item.) As I paid for it, I exclaimed; "I don't know about you, but I think it is damn funny." The clerk and other customers agreed. But not for the same reasons as I. To them, it was a first-level pun. A poke at radical environmentalists. An in-your-face mock. To me, it was a third-order pun. And the third order was a laying bare of the paradigm they clung to that was taking them (and all of us) towards falling off a cliff. As the river guides were fond of saying in those days: "It's Recreation, not Wreck Creation".

An environmental emergency was unfolding. The Plan was the best that could be managed to be done to try to mitigate it. And the timber industry owners secretly smiled. The enviros were going to give them cover. They were going to have a scapegoat for the rage of their employees.

Despite the Plan's implementation, Owls continued to decline. For two reasons.

One was that their habitat had already been severely reduced, and most of what remained had been fragmented.

The other was that the Bard Owl ("Bards") migration westward across Canada's boreal forests was already well underway, Bards are more aggressive than Owls, they are more "generalists" than are Owls, and thus they were bound to outcompete the Owls, no matter what. (Mass killings of Bards would only be a game of whack-a-mole.)

Did the enviros and wildlife biologists fail to recognize that dynamic underway? Probably. But, even for any of them that did, or would have, the Owls would still have been the species used to lever reductions on logging, because they were the only lever with which to pull for that, because the body of science around Owls had the only mass at the time capable of substantiating a scientific argument that could prevail in court, given the available statutes, the existing rationales for both commercial logging and for not doing so, and the emotional acceptance of the plebiscite. But only for Old Growth logging.

The prevailing argument identified that the Owls were also a surrogate for a list of other Old Growth-dependent species. But that list was limited to the several that had any appreciable amount of science in the hopper. There were, and still are, literally countless other species (as we now know of, for instance, mycorrhizal fungi and their associated soil microbiota) that logging Old Growth endangers. Yet, there are even more species that managing forests as essentially "tree farms" also significantly affects.

So, the Owls got the limelight. They were served up as the proverbial canary in the coalmine.

But it was already too late.

Then came the focus on Wildland Fire. Some of us began busting the sacred cows of wildfire management (a big business, easy extra bucks for federal land managers, and gravy "salvage" for timber companies. All powered by junk science and hand-waving.)

And, even as still practiced (other than the best prescribed burns, conducted by such outfits as Lomakatsi Restoration Project, of Ashland, OR) are detrimental to more species than they are beneficial for.

Decades later, came "Climate Change". Well, that is, decades later to the general population. The Petrochemical swingers already were already hip to that. But they had kept their mouths shut for decades (and had sewn shut those of those in their employ who would otherwise have Town Cried.)

So, now comes the Draft Amendment (DA), which is in danger of completely missing the point:

A) There is now no preventing large wildfire in forests.

B) But logging can and does increase their severity, especially because the subsequent replanting creates the forest type that most contribute to creating stand-replacing fires: plantations.

B) There is rarely getting them "under control" on our terms.

D) There is ever less possibility of preventing large-scale fires that burn from less-than-wildlands into very-tame-lands (which, from the point of view of more "natural" ecosystems, could look like clearing out noxious weeds.)

E) "Rebuilding" in such areas is an invitation to re-burns at some point (although if all structures are Three Little Piggies Brick, at least the shells might still remain.)

F) The emotional trauma of that specter (and its reality, when occurring) smothers common sense and rational

thinking.

G) It is a giant, never-ending, self-feeding, money pit.

I do not envy the position you are in as Draft Amendment composers/editors. The paradigms you are working with and within are all wrong. It is basically bad protoplasm. You are like medical doctors trying to figure out the longest life support for a terminally ill/damaged patient. No matter what you do, other humans will hurt/cry/die/blame you for their misery.

However, HUMANS are the problem, not the solution. The 5th and higher dimensions of ecosystem "reality" are the drivers. Try to remember that. Do your best to imagine how to give those levels the most freedom.

BEWARE arguments/proposals that just so happen to financially favor their advocates. (For example, a certain freshman US Senator that owns the largest company providing support for proposed increases in wildfire "response", the now co-opted term for "direct attack". Yeah ,yeah, I have seen the rhetoric that "it does not mean suppression". But, for anyone who believes that, please call me about a bridge . . . )

Jim Wells