

# Guidance on submitting comments Northwest Forest Plan Amendments DEIS using the CRA's 14 points as a guide (and more)



**Step 1.** Compose your comments (See page 3)

**Step 2:** Prepare your comments file. We suggest you submit your comments as a pdf file. Regarding personal information – see the Forest Service statement on the [CARA](#) page.

**Step 3:** The federal government's web-based comment system is called [CARA](#) and it allows you to upload a maximum of 50 files per submission. The total file upload size cannot exceed 200 MBs. Electronically submit your comments at this link:

<https://cara.fs2c.usda.gov/Public//CommentInput?Project=64745>

“Option to Submit Comment Electronically”

At the [CARA](#) webpage you will see:

## **Northwest Forest Plan Amendment #64745 Commenting on This Project**

*“The Forest Service values public participation. Communications from the public regarding this project, including commenters' names and contact information, will become part of the public record. Comments, including anonymous comments, will be accepted at any time. However, comments posted after the close of a designated comment period may not be able to be given full consideration. Anonymous comments and comments submitted after the close of the final designated comment period will not provide the commenter standing for administrative review. Comments, or in some cases other expressions of interest, along with respondent's contact information, submitted during the comment period may be necessary to establish a respondent's eligibility to participate in an administrative review for this proposed action.”*

There is more to read but you get the point. The Forest Service is very interested in hearing from the public. Comments often reveal to the agency legal or other flaws in the DEIS. The Coast Range Association comments reveal several missed issues and science studies.

The [CARA](#) webpage goes on to say:

## **“Option to Submit Comment Electronically**

“The form below can be used to submit your comments to the responsible project official.”

“.....post comments for public viewing on this web site via a public reading room. Active reading rooms allow the public to read or download your letter, including your contact information. If this project has an active reading room, a link labeled “**Public Comment Reading Room**” will appear on the main project page. The agency may withhold letters containing proprietary information, sensitive cultural or habitat locations, profanity, etc. All letters, including those not posted, will be considered and included as part of the project record.”

“**Disclaimer:** All contact information is optional; however, anonymous comments will not provide standing to object.”


“The form below can be used to submit your comments to the responsible project official.”

|   |  |                 |                      |
|---|--|-----------------|----------------------|
| First Name  | <input type="text"/>                               | Last Name       | <input type="text"/> |
| <input type="checkbox"/> I officially represent an organization |  |                 |                      |
| Address 1   | <input type="text"/>                               | Address 2       | <input type="text"/> |
| City  | <input type="text"/>                               | State           | <input type="text"/> |
| Province/Region   | <input type="text"/>                               | ZIP/Postal Code | <input type="text"/> |
| Country   | <input type="text" value="United States"/>         | Phone Number    | <input type="text"/> |
| Email   | <input type="text"/>                               |                 |                      |
| How would you like to be contacted about this project?          | <input type="text" value="Contact me via e-mail"/> |                 |                      |

Next, the page states: “Enter your comment in the textbox below. Enter contact information in the form fields above.”

“**Do not enter any personally identifiable information (PII) such as address or email in the text editor below. Your name and all information entered into the text box below may be published on this website.**”

|  |   |
|--|---|
| Do not embed images in the text editor. Use <b>Attachments</b> to upload images. |   |
| Letter Text  | <input type="text"/>  |
| Attachments  | Click the button below to select attachments. Please note that there is a maximum of 50 files per submission and total file upload size cannot exceed 200 MBs<br><input type="button" value="Select Files"/> Total Size: 0 Total Files: 0 Upload Progress: <input type="text"/> |

|  |   |
|--|---|
| <input type="checkbox"/> I'm not a robot |  |
|--|---|

The submission process is easy and straight forward. You have two choices: compose your comment as a file on your computer and upload the file. Or write a text message directly into the text form. Also, if you find a science paper or article important, you may submit the document or a link to it.

## Coast Range Association

Comments-A: [Fire Resistance, Forest Stewardship, and Climate Change](#)

Comments-B: [Sustainable Communities](#)

Comments-C: [Cumulative effects](#)

The CRA's comments are written for and to the Forest Service. They may or may not be easy for you to understand. Comments-B is new and contains interesting information. Our comments have information and perspective you won't find anywhere else.

Below is a list of talking points to help with your comments. Pick several points you feel comfortable using. We urge everyone to let the Forest Service know the DEIS must address points 1, 5, 6, 9, 11, 12 and 14 from Comments-A.

It is particularly important to let the Forest Service know that point 14 is important. Losing any more Siuslaw National Forest native forest is unacceptable and wrong.

Look over all the CRA talking points and refer to our comment's for explanation. Then expand on a point or two by way of using your knowledge and personal experience. Here is the CRA's list of issues:

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 decisions 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 Siuslaw National Forest (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 is 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's approach of not using fuel load 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.

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 impacts 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 Northwest Forest Plan forest management. Please re-read the set of scientists' warnings to humanity.

**8.d Ecosystem Integrity:** Wet and rainforest temperate ecosystem integrity is not supported by **commercial** timber removal and extensive road networks. Non-commercial plantation thinning (minimum canopy cover of 75%) and underplanting are warranted.

**8.e Carbon:** World class sequestration of atmospheric CO<sub>2</sub> is a natural outcome of proper forest stewardship when managing for wildfire resistance and ecosystem integrity. This is especially true for the Siuslaw National Forest.

9. The DEIS must be seriously revised for wet and rainforest life zones and incorporate wildfire refugia science for the goal of wildfire resistant forests.

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 75% canopy cover post-thinning. 75% or more forest canopy is necessary for wildfire resistance in wildfire refugia management strategies.

12. Commercial forest thinning must be replaced by Forest Service budget funded thinning.

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

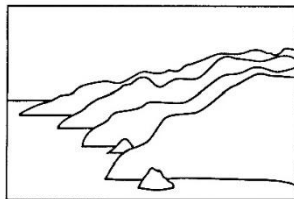
14. We applaud the Forest Service for maintaining Late Successional Reserve (LSR) areas. However, we strenuously oppose future commercial timber harvest as a management practice in LSRs. The harvest of naturally regenerated stands in LSRs within the Siuslaw National Forest, no matter what age, will engender vigorous public opposition. Option 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.

### **Endorse the CRA's Comments**

There is no need to re-submit the CRA's Comments documents. But you might add the following statement in your comments "I endorse the Coast Range Association's (CRA) comments on the DEIS. Please fully consider the CRA's comments."

If you are working to submit substantial comments using our comments documents and have a question - call Chuck at 541-231-6651 or write at [chuckw@coastrange.org](mailto:chuckw@coastrange.org)

The CRA's comments always are on web at: <https://coastrange.org/>



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