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RE: Notice of Intent for Northwest Forest Plan amendment

Thank you for this opportunity to comment on the Notice of Intent to prepare a Draft Environmental Impact Statement (DEIS) for the Northwest Forest Plan (Plan) amendments. Safe Alternatives for our Forest Environment (SAFE) and the Northcoast Environmental Center (NEC) request that all of our comments in this input be included in the forthcoming DEIS.

Have the Original Goals of NWFP been met?

The NOI states: *“In many cases, the land management plans within the NWFP area are delivering effective, landscape-scale management, achieving positive community benefits and moving toward long-term desired ecological conditions by maintaining vegetation conditions that support the Spotted Owl and marbled murrelets, protecting mature and old-growth forests, and retaining and improving habitat for aquatic and riparian-associated organisms.”*

While our two groups are in qualified agreement with this statement, the reduction of timber cut levels in most Late Successional/Old Growth (LSOG) forests, protections of the Late Successional Reserve (LSR) System, and the cessation of new forest road construction are primarily responsible for the improvements identified by this statement in the NOI. We still believe there is room for improvement. We see that agencies have continued to use every loophole possible to continue cutting in LSRs and harming Old Growth and Mature stands

The reason for creating the Northwest Forest Plan was to ensure viability of LSOG-dependent species. It seems pretty obvious to us that these species, forest wide, are in decline and that their habitat has been seriously degraded or, in some cases, eliminated. The only way for this precipitous decline in these species to be slowed is to protect the remaining habitat that they need for survival: Late Successional/Old Growth forests. Forests must be kept viable to support these populations and should be well-distributed across the planning area in order to support the likelihood of species survival and persistence over an extended period of time.

Any amendments to the original Northwest Forest Plan must guarantee species viability.

The goal for this amendment process to the Northwest Forest Plan must be to strengthen protections, while at the same time addressing any issues, like fuels reduction, that may include and/or rely upon vegetation management. Increasing the intensity and scope of vegetation management actions, as suggested by the NOI, will keep the plan from meeting the primary objectives of “Protecting and enhancing biodiversity of mature and old growth ecosystems [that] is a central tenet of the NWFP” and the Forest Service’s stated goal of increasing “fire resistance” in light of the serious effects climate change.

It is suggested in the NOI to expanding logging opportunities by eliminating the current stand age limits for no cutting in LSRs or raising it to older than 80 years, and/or increasing the diameter limit on allowable cutting in order to supposedly ‘improve fire resistance’ or increase ecosystem adaptability. We see this in direct conflict with the objective “to meet the original intent of the NWFP to conserve mature and old-growth ecosystems and habitat for the Spotted Owl and other species, protect riparian areas and waters...”

The use of the term “clarifying direction” sounds like a green light to raise the planned cut levels across Land Use Allocations (LUA) where cutting is now prohibited or limited. This sounds like opening up the back door to allowing over cutting of these sensitive lands.

Fire & Tribal Consultation and Involvement

SAFE and the NEC are in full support of the Forest Service’s commitment to a NW Forest Plan amendment that incorporates traditional Indigenous ecological knowledge (TEK) into landscape stewardship techniques and ensures robust collaboration with the Tribes who have used and stewarded these lands using fire based cultural practices and subsistence since time immemorial. We would like to see Tribes have more control over management decisions of their ancestral lands.

SAFE and NEC support the use of prescribed fire in fire-adapted ecosystems as a practice to promote biodiversity, to restore vegetative communities and natural fire regimes, and to provide an additional wildfire safety buffer for communities. We also think it is an important tool for maintaining roadside shade fuel breaks. Individual burns should respect Tribal treaty and consultation rights, prioritize the safety of firefighters and residential communities, comply with applicable environmental laws, minimize air quality impacts, and be based on best-available ecological and fire science - including Traditional Ecological Knowledge.

Indigenous peoples in many ecological zones of North America engaged in cultural burning for millennia. Indigenous people burned – and continue to burn – for a wide variety of reasons, including dangerous fuel loading and to produce basket materials and materials for arrows, to stimulate growth of preferred foods, to create deer and elk habitat for hunting, and to protect villages from wildfire. We recognize the important cultural and ecological role of Indigenous cultural burning, and support reducing or removing policy barriers that impede such practices.

ENDANGERED SPECIES ANALYSIS

The DEIS must evaluate the effects of alternatives on all listed Species in the NWFP region; ESA Requirements

The existing protections under the NWFP are not ‘single species’ oriented (*as asserted on page 231, as Recommendation 8 [Referring to BioA Chapter 2 Management Recommendations] found in Chapter 4 of the Supplemental Reports to the Bio regional Assessment*) as the species protected by the NWFP include, in addition to the Northern Spotted Owl, a long list of other protected species such as the Marbled Murrelet, the Wolverine (recently listed), various salmon and steelhead as well as other species. In addition, there are the species which must be monitored and protected under the Survey & Manage Requirements under the Standards and Guidelines of the NWFP. The DEIS must evaluate the effects of the alternatives on all listed endangered and threatened species.

The DEIS must evaluate compliance of the alternatives with ESA requirements for all listed species, and the DEIS must also evaluate compliance of the alternatives with applicable legal requirements associated with State issued listings.

The DEIS must also consider whether alternatives satisfy USFS obligations under the ESA to ensure that the ecosystems supporting those listed species are also resilient in the face of climate change, and not only avoid jeopardy, but also satisfy the obligation to further conservation of the

Northern Spotted Owl, the Marbled Murrelet, the Wolverine, the Canadian Lynx as well as listed salmon and steelhead, and all other listed species living in the region of the NWFP.

By way of example, the DEIS must document all US F&WS listings of threatened and endangered fish species within the NWFP Region and evaluate the effects of the alternatives on those species.

In addition, the proposed alternatives and analysis of the effects of alternatives in the DEIS must address the continued decline of anadromous fish within the Region.

The Aquatic Conservation Strategy (ACS) was incorporated into the 1994 NWFP to help address the significant decline in salmon and steelhead runs occurring in the Northwest and Northern California in advance of these F&WS listing of species.

Maintaining and strengthening the ACS in order to address the ongoing challenges of endangered native fish throughout the area of the NWFP is clearly necessary, and even more important due to climate change impacts. The DEIS must evaluate alternatives that involve strengthening the ACS, including but not limited to the following requirements for the ACS and for habitat protection, specifically dramatically reducing: sedimentation from legacy roads that have not been eliminated; impacts to watersheds from logging, which contribute to warming water temperatures; and scouring of streambeds from increased rain. The EPA and other government agencies are working to restore shading along watersheds and create/recreate cold water refugia and remove and replace improperly sized and located culverts which must be removed to restore historic habitat.

DEIS must require new surveys of occupied and potential nesting habitat of all listed species and other habitat for foraging prior to consideration and/or adoption [implementation] of any boundary changes of LSRs or Matrix or AMAs, as well as any management changes from those included in the original 1994 NWFP.

DEIS must evaluate and favor alternatives that will avoid and minimize any take, as defined in the ESA of ESA-listed species, and will also avoid and minimize take of state-listed species in the NWFP region.

The agency's Barred Owl Management Strategy is a misguided attempt to cover up the real cause which is the destruction of old growth forest habitat which has been the leading- and, arguably, the primary - cause of the decline of the northern spotted owl. Despite the feeble attempts to address habitat destruction through development and implementation of the Northwest Forest Plan, spotted owl populations continue to be in free fall in large part due to delayed and cumulative effects of habitat destruction and loss of existing suitable habitat to wildlife and other climate-related stressors. The Northwest Forest Plan amendment must address existing habitat loss by conserving all remaining mature and old growth forest throughout the

spotted owl's range and through landscape level forest restoration, including corridors for connectivity, to increase the resilience of these habitats to frequent fire events. Nesting areas for spotted owls must be protected from logging and forestry practices. Barred owls are edge area nesters, and forest fragmentation contributes to their establishment in forests.

Fire in Congressionally Reserved Areas and Administratively Withdrawn Areas and Inventoried Roadless Areas

We are opposed to any blanket approval of prescribed fire in either Administratively Withdrawn Areas or Congressionally Reserved Areas, or Inventoried Roadless Areas or any other LUA where logging is not now permitted, and the DEIS must not include any such approval. Any use of prescribed fire in these areas should be evaluated on a case by case site specific evaluation.

SAFE/NEC does support restoring the natural role of wildland fire in backcountry areas – where the bulk of congressionally reserved areas in the National Forest are located – and monitoring wildland fires to ensure the safety of communities and benefit to the ecosystem.

Efforts to reduce WildFire Risks

SAFE/NEC supports the reduction of wildfire risks with the following limitations: the agency must retain old trees and large mature trees and reduce threats to them; limit new and reconstructed roads; prohibit mechanical entry into all Roadless Areas, only utilizing hand crews; protect soils; retain derivative snags and logs; retain and enhance fire resilient hard across the landscape.

We strongly support the creation of a network of roadside shaded fuel breaks throughout the road network of the National Forest system creating potential control lines for future wildfires and valuable escape routes for rural residents during wildfire events.

Post Wildfire Silvicultural Direction:

For each alternative the DEIS must provide a full description of all post-wildfire silvicultural direction as it would affect each NWFP LUA (Land Use Allocations).

If “post-wildfire silvicultural direction” is another description for “post fire salvage logging” it must be noted that past practices have included removal of live (green) trees and the construction

and reconstruction of roads; such action should be strictly avoided since it is not consistent with the objectives of “protecting and enhancing biodiversity of mature and old growth ecosystems.”

Fire in the North West Forest Plan area

The NOI states:

“In recent years, large, uncharacteristic wildfires have resulted in losses of mature and old growth forests eliminating gains achieved in the first 25 years of implementation of the NWFP, and research indicates that large wildfires, with impacts to mature and old growth forests and associated NSO habitat, will increase in frequency and extent in both the wetter (e.g., western Cascades) and drier (e.g., eastern Cascades, Klamath province) portions of forests within the NWFP area.”

That gains have been eliminated is an exaggeration. We are concerned by the lack of differentiation between areas that have burned at high and moderate intensity, and areas that burn at low intensity or in mosaic pattern and areas where stand replacement occurs.

The DEIS must include specific data that fully describes the areas that have burned for each ecological province. These area descriptions should be disaggregated for at least the period 1990-2022, by National Forest administrative unit and include the following information:

- geographic province,
- burn intensity and severity,
- the state of development (roadless areas, and areas that were roaded),
- the cause of each fire,
- the year the fire occurred, and land use allocation of the area burned.

While dramatic climate change is virtually certain, and will affect forest conditions, the agency’s management practices must reflect best available science.

The DEIS must provide more clarity on this, and incorporate the detail that was utilized in the Background Documents.

Vegetation management

SAFE and the NEC assert that the use of herbicides as a management tool is unacceptable and is a threat to humans, plant and animal species that live in and use the forest. Herbicides should not be used on national forest lands. Instead, we support the use of mastication, chipping, goats and prescribed fire.

Broaden Protection of Mature and Old Growth Trees, Stands and Forests, and Protect and enhance biodiversity of Mature and Old Growth ecosystems

This process must ensure that all aspects of the amended NWFP, clearly and without reservation, meet the objective of ensuring the persistence of all late successional species, across their historic range, that were intended to be protected in the 1994 NWFP;

This amendment of the NWFP must retain a strong and robust “system of reserves and leave tree requirements” that are not weakened by “clarified” management direction”, “active management”, and/or “nuanced direction.”

We strongly agree with the statement in the NOI that “*mature and old growth stands outside of reserves do not have the same level of protection*” as the same stands in other LUA’s, particularly in LSR. That protection must be added in the DEIS for those stands in all other LUAs, including in Matrix, so as to prohibit the cutting of mature and old growth trees and stands in those LUAs.

The REO must no longer have discretion to waive the prohibitions in the NWFP, including REO Memos, and must at minimum enforce the terms and provisions of REO Memo 694, as amended by Memo 801, so as to protect mature and old growth trees in LSRs

The primary focus of the NWFP, and the amendment process effectuated through the DEIS, must be to attain ecological sustainability of forest and habitat and species.

Chapter 3 of the Bioregional Assessment includes the following statements on page 98:

“The late-successional reserve Workgroup has identified many late-successional reserve assessments that may need to be updated to allow additional beneficial activities that would reduce large-scale wildfire risk and promote maintenance of late-successional forests. The standard for the consistency review is based on how proposed activities in late-successional reserves will protect or enhance old-growth forest conditions. This means that projects with multiple objectives (for instance, old-growth enhancement plus fire-risk reduction near the wildland urban interface) and projects that include portions of a late-successional reserve and other lands such as matrix, may not fully meet the standards set forth in the NWFP.”

The suggested concerns in the above quoted paragraph clearly contemplate significant changes by the Forest Service to the original LSR management requirements, and once again makes no mention that any such suggested changes must first and foremost comply with ESA requirements as well as ensure the persistence of late succession species - a critical objective of the 1994 NWFP.

We strongly object to any reductions in the protections of LSRs and urge increased protective management requirements for all LSR, and strong requirements of compliance with ESA requirements.

Canopy Cover and Shade

Shade is a very important component in climate resiliency It is critical for the many wildlife species that depend on old growth and mature forest it's also proven to be more fire resistant than forests that are opened to direct sunlight The temperature difference in a closed canopy forest condition can be as much as 20 degrees cooler than forest conditions open to sunlight.

Thank you for this opportunity to comment. We look forward to engaging throughout this process.

Larry Glass

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