492 Diebert Road
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March 3, 2025

To Whom It May Concern;

I write today to comment on the Northwest Forest Plan amendment. I write as a concerned citizen and affected party. My family was economically affected by the adoption of the Northwest Forest Plan. As an adult, I am a resource professional who has worked in salmon restoration, tribal policy, and environmental permitting. As such, I offer both professional and personal commentary on this proposed amendment.

NWFP Amendment Does Not Address Its Purpose

Thirty years into the Northwest Forest Plan (NWFP), Northern spotted owl (NSO) declines have not been meaningfully addressed.

In 1994, FEMAT estimated that there was sufficient existing habitat to provide for stable, well-distributed Northern spotted owl populations on federal lands (pg 281, Conservation Biology Volume 20, No. 2 April 2006 Thomas et al). In spite of this recommendation, the Clinton administration made additional changes to Option 9 including enlarging buffers, creating 40-ha reserves around existing owl nests in matrix, and creating a 'survey and manage' list.

The Northwest Forest Plan adopted these strategies to affect a recovery trend for the Northern spotted owl. Yet this DEIS states that Northern spotted owl losses continue. The most recent reporting from the indicates that barred owls are the primary factor negatively affecting Northern Spotted Owl survival. (25-year-nso-population-meta-analysis-briefing.pdf) Franklin, A.B. et al. 2021. Range-wide declines of northern spotted owl populations in the Pacific Northwest: A meta-analysis. Biological Conservation, Volume 259, July 2021, 109168, ISSN 0006-3207.) The report goes on to note that annual survival rates have been declining since 1993 with notable declines occurring after 2012.

And in the Biological Resources section, the DEIS flat out says that the NSO face 'extirpation.' Plain English? **Extinction.** Despite the major actions employed over 30 years.

Increasing old growth prevalence and stand size was a key strategy in Northern spotted owl recovery. We are also not seeing increases in old growth habitat. Why? Forest fire accounts

for over 70% of old growth habitat loss in the reporting time period. The analysis does not even account for the traumatic losses of 2020-2025.

While this does not mean that we did the wrong thing, **perhaps we should reassess our assumptions about what we are doing and why, if the targeted recovery goal is not working.**

This information underscores that despite this clear lack of a recovery trend, the USFS directed employees and the Federal Advisory Committee to amend, rather than revise, the NWFP.

NWFP Amendment Constraints

The amendment does not observe and track initial NWFP implementation successes and failures.

When the Federal Advisory Committee was formed in 2022, it was asked to provide recommendations on planning topics such as the national Wildfire Crisis Strategy or application of best available science on several topics. None of the evaluation options addressed NSO habitat or status.

Additionally, some recommendations from the Federal Advisory Committee are at odds with the proposed actions. Recommendations:

- FORSTW-ALL-DC (03) Desired conditions: Vegetation structure and composition provide ecosystem resilience to climate change, wildfire, and other stressors including altered fire regimes, drought, and flooding in riparian systems.
- FORSTW-ALL-DC (07) Fire occurs as a key ecological process in fire-adapted ecosystems where it does not pose an unacceptable risk to life and property. Fire regimes, including the frequency, extent, and severity of fire, are ecologically appropriate and enhance ecosystem resilience and habitat heterogeneity, diversity, and quality.
    - Guidelines focus on stand level interdisciplinary approach using plant associations, including TEK, and land management history
    - Mapping environmental variables
    - Using scientific approaches for differentiating forest types
    - Planning teams should use a variety of approaches to determine stand age

This is an emphasis on site-specific treatments. Yet the specific management objectives drop actions into buckets that are both broadly worded geographically and narrowly constrained by stand age:

- FORSTW-LSR-MOI-STD (01) No timber harvest shall occur in moist forest stands older than 120 years old in Late-Successional Reserves except to provide for tribal co-stewardship and cultural use or to reduce wildfire risk to communities.
- FORSTW-LSR-MOI-GDL (01) In young, moist forest stands less than 120 years old in Late-Successional Reserves, forest management activities should be designed to maintain or restore late-successional and old-growth forest conditions
- FORSTW-MTX-MOI-OBJ (01) Within 10 years of amendment approval, treat at least one tenth (65,000 to 81,000 acres per decade) of young stands (established after 1905) in moist forest Matrix lands across the Northwest Forest Plan area
- FORSTW-MTX-MOI-PMA Young stands are a priority for active management, including variable density thinning and variable retention harvesting.

If the USFS adopts the DEIS revisions as written, the result will be status quo; forest management will be set using the Land Use Allocation and the GIS stand age, rather than site specific, stand focused treatment as recommended by the Federal Advisory Committee.

Further, a major impediment to initial NWFP objective implementation was lack of funding – this has not been overcome and has in fact been exacerbated by recent staffing cuts and axed agency funding.

Finally, the No Action is the NWFP *as administered*, not as it was written. Therefore 'No Action' is not valid for comparison, because the NWFP "as administered" never underwent NEPA review.

Alternative B, Recommended Alternative

Issue 1: Incorporation of Indigenous Knowledge and Increased Tribal Inclusion

The NWFP did not engage tribes in its process in 1994 (3.2.1.2). The decision to amend, rather than revise, the NWFP, disengages meaningful tribal engagement. Additionally, issue tracking under the NWFP has indicated that key recommendations still need to be implemented. The DEIS has a list of these recommendations and reports, of which the DEIS works to adopt in the tribal engagement objectives (page 3-10).

It is important to note that meaningful tribal engagement is difficult to do without trusting and collaborative relationships. Tribes have historically significant reasons to be concerned about federal involvement and commitment. The forests will need to hire or retain staff that can build these bonds while receiving consistent support from USFS leadership at all levels.

Consistent funding, staffing of tribal liaison within the specific tribe's employment, direct support for tribal/USFS initiatives, priority selection of tribal enterprises as vendors, tribal engagement in conducting forest health work, no-cost leases of unused or underused USFS facilities, and other initiatives that are flexible and collaborative would indicate a more genuine partnership.

And finally, the USFS should explain why the proposed action, Alternative B, excludes many suggestions in Alternative D, such as tribal inclusion in forest stewardship (TRIBAL-FORSTW-ALL-PMA-D) or expanded forest stewardship contexts that include traditional ecological knowledge (TRIBAL-FORSTW-ALL-GOAL-08-D).

Issue 2: Forest Stewardship

Alternative B does not address the ongoing losses due to wildfire except to broadly discuss risks to communities, which generally are a tiny fraction of the landscape in the National Forest areas. Working from the edges only (maybe) protects people, not important forest resources. The proposed forest stewardship actions are likely to continue the trend of diseased, dying, or dead forests interspersed with healthy forests. There is a serious risk that these (in)actions will continue to result in the loss of even more old growth to wildfire.

NWFP DEIS analysis does not evaluate the success, or failure, of designated land allocations in application. Failure to assess successful versus unsuccessful elements of the NWFP means the Amendment lacks context and scientific rigor.

Some Matrix areas have emerged to produce good quality forests with LSR features, while LSR allocations may have initially been established in plantations that, although older now, are not trending towards old growth feature development.

Our collective knowledge of landscape connectivity, fire risk, and special ecosystem features has all grown since 1994. The DEIS notes that large wildfires will increase in frequency, severity and extent in the coming years. Alternative B notes that 'the importance of considering structure conditions and not just age in determining treatment needs" is a consideration. Yet Alternative B prevents salvage in moist forest. In spite of increasing fire risks in moist forests.

A flexible framework strategy is desirable to blend these two needs; protection of valuable ecological systems from both human and environmental damage. Areas where flexibility exist in the Plan include management of Inventoried Roadless Areas, Late Successional Reserves, and authorization of small diameter or young age stands (page 3-35). Flexibility is critical to effective administration in a changing environment.

In conclusion, expectations that forest health treatments are feasible without an economic driver is unrealistic.

Issue 3: Fire Resistance and Resilience

Timber harvest, with or without prescribed burns, is a key tool in fire resistance and resilience planning and implementation. Fire suppression in the 20th century resulted in many areas of increased fuel loading, while management changes from heavy harvest and replanting to virtually no harvest or thinnings, resulted in dense industrial forests with ever increasing risks from pests, disease, and wildfire.

Societal resistance to logging in national forests, or any forests, has led to changes in forest management at all levels. Harvest technology has changed. Access impact strategies have been improved. Even how forest management actions are laid out has changed. Yet the discourse associated with cutting trees remains firmly negative. This is a disservice, in particular in the discussion around wildfire resistance and resilience.

2020 was a terrible year for everyone in the Pacific Northwest when multiple fires burned over 1 million acres, thousands of homes, and destroyed old growth and habitat for many, many miles. Eleven people were killed. While not all fires can be prevented, allowing dangerous fuel loading due to our start (overharvest) and stop (failing to manage a re-planted forest) timber practices is irresponsible.

Issue 4: Biological Resources

The DEIS notes that Northern spotted owl losses are primarily due to competition with the barred owl. Here is where we see the DEIS state that the NSO species faces 'extirpation.' **Extinction.**

When the NWFP was adopted, it was FOR the Northern Spotted Owl recovery. It explicitly was adopted against the express wishes and economic suitability of many communities. And yet here, we have acknowledgement using an oblique term, that the NSO may not recover. Here, we have the root of the NWFP, 142 pages into the whole document, **being amended without justification for why the Plan's objective is failing.**

Issue 5: Climate Change

Per the analysis provided in the DEIS, we see that summers will become drier and drought events more frequent. Greater wildfire risk and increasingly water-stressed vegetation. Higher volume, flashier rain events occurring more frequently. Loss of soil. Increased fire frequency, more landslides. Tree mortality. Reduced cold high-elevation forest. Higher dead and down forest litter storing greater amounts of total carbon.

As noted on page 3-92, "[a]ll three action alternatives would provide additional plan direction that protects stands in moist Matrix established before 1825 and substantially limit treatments in stands established between 1825 and 1905." This statement is at odds with itself. While the *idea* of protecting trees is consistent with storing carbon, the *action* of preventing fire prevention actions from being contemplated means that in reality, much of this forest could be lost to wildfire in the near to mid-term.

Further, the *idea* that harvest results in carbon storage loss is false. Harvest activities may reduce total forest site carbon during harvest, but logs removed from the forest retain the carbon trapped in their cellular structure. It becomes stored in houses, commercial buildings, or delayed release when heating homes in pellet or wood applications. The plan should not conflate these issues. Table 3-16 does illustrate that wood use off-forest has carbon storage benefits (plan component Sustainable Communities) but does not assign the same description to other features (stewardship) which is confusing, as well as inaccurate, for a reader unfamiliar with forest management practices or carbon storage in general.

Issue 6: Air Quality

It is a valuable discussion to include air quality in the NWFP amendment process. Air quality in the PNW has increasingly been affected in the last decade by increasing wildfires and wildfire severity. Figure 3-4 shows the issue for the Bend-Redmond area quite clearly. A similar graphic for the Portland or Seattle areas might illustrate regional concerns associated with restricting wildfire prevention treatments to Matrix areas.

Issue 7: Sustainability of Regional Communities

"The NWFP has largely not achieved its timber production goals, which were the NWFP's primary criteria for supporting economies and community wellbeing. Impacts include not only timber-related employment, but also community and industry infrastructure, and community connection to management and conservation practices and activities."

First, this is true. As someone who grew up in a community that went from vibrant and busy to economically depressed and nearly impossible to remain in, the NWFP and listing of the Northern spotted owl nearly ruined my home community. Citing recreation as a trade off is a non-starter. Recreation has picked winners and losers, and the towns without recreation are not thriving.

Stewardship has been helpful to some rural communities. But it is variable, and the timber targets keep moving. In order to really support communities, the USFS needs to be ready to provide stable sale volumes to regional, or better yet, local mills, while also enabling local businesses to directly or indirectly, support action. Further, the primary stewardship

actions appear to be focused on the dry side of the NWFP planning area. More clarity is needed to address how community sustainability has been developed for moist forests.

Moving into Table 3-21, the direct employment figures and contribution for labor income are actually really small. The Port of Longview, located in Longview, WA, had a direct employment figure of 1250 jobs and a total jobs supported amount of 13,500 between direct, indirect, induced, and related jobs. The Port's supported wage contribution in the region $795,000,00, as compared to the entire NWFP planning area contributing $1.7 billion. This is not to discount the value of the USFS contributions, but to illustrate that a local port district is contributing approximately half the total economic impact in a small Western Washington economy. The USFS can, and should, do better.

Additionally, while noting **the value recreation plays for local communities in recovery from timber reductions, this plan should note that recreation is severely underfunded on the USFS side.** Cutbacks to seasonal staff, both historically and this past fiscal year, mean that trails, trailheads, and facilities lack needed much needed maintenance. And due to increasing wildfire activity, recreation-focused employees are often pulled off their forest during the critical repairs and maintenance window to fight wildfire. **This further damages relationships** with local towns and communities who are depending, again, on the forest service to adequately staff recreation and/or follow commitments.

Visitor-supporting services, like road maintenance, also struggle with consistent funding. In the Gifford Pinchot National Forest, despite support on forest and off, engineering and road maintenance staff have struggled obtain sufficient funds to maintain or repair roads. As an example, Forest Road 25 has been closed for over a year due to a landslide. This has closed a loop road between Randle and Cougar, two small and vulnerable towns, on a main route to Mount St. Helens.

Conclusions

The Northwest Forest Plan Amendment DEIS has logic gaps internal to the document and in the potential implementation pathway.

- The Amendment
    - ignores the recovery status of the Northern spotted owl
    - fails to adequately assign wildfire a role in losses of old growth features
    - did not fully integrate tribal consultation in either scoping the project or recommendation development
    - sets the no action alternative as the "NWFP as implemented," rather than as adopted, therefore invalidating all alternative discussion relative to the no action alternative

- Potential Implementation
    - Is overly optimistic about implementation outcomes given uncertain and unpredictable funding levels – this plan has no associated budget certainty
    - Desired conditions for forest stewardship do not adequately account for climate change
    - Dry and moist forest descriptions do not account adequately for the mixed-severity fire regimes; mixed severity is generally bucketed with moist, under representing the fire hazard and reducing the fire hazard reduction options.

Many of the pieces in this plan are suitable as a starting place, and many of the inconsistencies and failures can be rectified with the removal of the underlying faulty assumptions that we are doing this work <u>for the owl</u>.

Please consider the contents of this letter as spoken by an advocate and supporter of both the agency and the mission.

Sincerely;

Amy Boyd