



March 5, 2025

RE: Comments on Northwest Forest Plan Amendment DEIS

Dear Regional Forester Jacque Buchanan and Regional Forester Jennifer Eberlien,

Great Old Broads for Wilderness is a women-led national grassroots organization that engages and inspires activism to preserve and protect wilderness and wild lands. Please accept these comments for the draft EIS Northwest Forest Plan Amendment on behalf of 6 Pacific Northwest chapters (called “Broadbands”): Rogue Valley (southern Oregon), Willamette Valley (Salem to Eugene), Bitterbrush (Central and Eastern Oregon), Cascade-Volcanoes (Portland area and Southwestern Washington), Salish Sea (Northwestern WA), and Polly Dyer (Seattle). Our roughly 500 members and supporters in the region include a diverse range of experience and expertise, and many have raised families and enjoyed careers in this region. We enjoy the National Forests included in the proposed amendment for many purposes - from boating and hiking, to bird watching and foraging. We also know how important these forested public lands are for storing carbon to battle climate change and filtering our drinking water. And while we value these forests for ourselves, we also value them for the benefits they provide for our children and grandchildren, and the countless species of plants, animals, and fungi that live in the Pacific Northwest.

For the past 30 years, the Northwest Forest Plan has provided a global example of a successful and comprehensive landscape-scale ecological management strategy. Envisioned as a 100-year plan, it has simultaneously conserved and recovered habitat for imperiled species like salmon, northern spotted owls, and marbled murrelets, protected drinking water supplies, and stored immense quantities of carbon from the atmosphere as a natural – if unintended – climate solution.

Thirty years after the Plan’s adoption, climate change and biodiversity concerns have only intensified, making protection and recruitment of mature and old-growth forests even more important. One of the most impactful measures the Pacific Northwest region can do to address these crises is to uphold and strengthen the Northwest Forest Plan’s conservation directives.

Significant Concerns with the Proposed Amendment

Any amendment to the Northwest Forest Plan must retain if not expand the network of forest reserves where natural processes can flourish, and maintain and recruit habitat needed by imperiled species like spotted owls and marbled murrelets in order to persist and recover. Any

amendment must also adequately protect streamside habitat that provides cool, clean water supplies for communities and salmon, while at the same time ensuring our Pacific Northwest forests continue to achieve their potential as carbon sinks that help mitigate climate change. These goals can all be achieved by protecting mature and old-growth forests from logging while supporting Tribal sovereignty and environmental justice.

Unfortunately, none of the action alternatives described in the Draft EIS adhere to these core elements. Instead of focusing on increasing the amount of old growth, which remains at a severe deficit across the landscape, the proposed amendment aims to exploit fear of fire in our forests by doubling – and potentially tripling – commercial logging from current levels. This dramatic increase in logging would occur across an even smaller footprint than the original Northwest Forest Plan, since the Bureau of Land Management has removed all of its 2.6 million acres of Western Oregon forest lands from the protective management scheme. In other words, all the adverse impacts associated with commercial logging – road-building, sediment delivery to streams, loss of carbon storage, disturbance and degradation of species habitat – would be even more concentrated on our national forests.

The Forest Service's fire suppression, fire exclusion, and clearcutting policies have significantly altered forests and degraded frequent fire-adapted ecosystems. To address the threat of wildfire, the agency has focused on increased logging across national forests. Logging mature and old-growth trees, though, is counter-productive to protecting communities and restoring fire to landscape. These trees are the most fire-resilient, and focusing on logging them takes resources away from proven community protection strategies such as creating defensible space and emergency preparedness. The agency should prioritize protecting communities over commercial logging, and establish the strongest possible protections for mature and old-growth trees as part of its wildfire strategy.

The Forest Service's proposal also shifts the fundamental purpose of the Northwest Forest Plan from developing more old growth across the landscape to, at best, maintaining what little old growth remains. It would open up over 800,000 acres of mature forests to destructive commercial logging that is not ecologically justified, and allow new loopholes to allow logging in reserves meant to protect fish, wildlife, and drinking water. The proposal would also permanently lock existing mature forest stands out of potential protection, which in turn would severely limit recruitment of old-growth to replace what will naturally be lost to disturbance over time. However, despite admissions in the Draft EIS that species that rely on older forests would be adversely affected by these changes, the Forest Service has not offered any measures to ensure protection of vitally needed habitat for spotted owls and murrelets. As proposed, the amendment will not allow the spotted owl to recover, but will instead jeopardize its chance of survival.

We strongly oppose weakening critical environmental protections under the Plan. Mature and old-growth trees and stands are naturally fire-resistant and fire-resilient, as well as carbon-storing champions. The Forest Service must not sacrifice the immediate and near-term biodiversity values and the natural climate solution our older forests provide in exchange for a return to older forest logging and uncertain ecological benefits that may never accrue. We

urgently need to increase carbon storage in our national forests to mitigate climate impacts. In addition, the perilous state of coho salmon, spotted owl, and murrelet populations requires maintaining currently available habitat and recruiting additional habitat. Targeting mature and old growth forests for logging, as this proposal does, will only push these species closer to the brink of extinction and undermine efforts to stave off the most damaging effects of climate change.

Management in moist forest ecosystems

A century ago, the rain-drenched westside forests supported some of the oldest, largest trees in the world (coast Douglas-fir remains the second-tallest tree species in the world). Since the mid-twentieth century, industrial-scale logging on federal land has whittled down these giant forests to remnant stands. The Northwest Forest Plan halted most old-growth logging in the region and managed to save most old forest remnants. However, logging continues in unprotected stands of mature forests, often in the name of thinning or fuel reduction.

The high productivity of the moist west-side forests creates a continuously layered canopy with a variety of tree species, sizes, and ages, all growing in a moisture-holding environment of downed logs, thick moss, profuse epiphytes, and rich organic soils. They are naturally fire-resistant. Thinning forests compresses the soil, destroys the understory layers, increases susceptibility to erosion and windthrow, accumulates broken branches as fuel, and opens the canopy for more rapid drying. All of this increases fire susceptibility and releases carbon into the atmosphere.

In moist forests of western Oregon and western Washington, thinning doesn't deter wildfire. Because of the abundant rainfall in this ecosystem, a thinned understory will grow back quickly, too quickly to make any difference to the relative infrequency of fire in this region. Dr. Beverly Law (2021)¹ states that west of the Oregon Cascades there is no scientific basis to attempt to reduce fuels because they grow back rapidly; it is not possible to reduce their flammability.

In addition, thinned, open understories provide little shelter for moist-forest species (marbled murrelets; northern spotted owls; red tree voles) and invite an influx of predators (ravens, barred owls, great horned owls) that further threaten these already threatened species. Fragmentation of the understory vegetation as well as the canopy disrupts the movements of many animal species, creating barriers for foraging and migration.

We are concerned that the proposed amendments will degrade LSRs in moist forest ecosystems by removing protections from logging for stands between the ages of 80 and 120 years. This would open 824,000 acres to commercial logging.

We are further concerned that rather than continue to prohibit logging activities in moist LSRs unless they restore or accelerate late-successional or old-growth conditions to benefit

¹ Law, Beverly 2021. Statement to the United States House of Representatives Subcommittee on National Parks, Forests and Public Lands, concerning "Wildfire In A Warming World: Opportunities to Improve Community Collaboration, Climate Resilience, and Workforce Capacity." April 29, 2021.

ESA-listed species, new exceptions would be added to allow logging to “restore habitat for other species that depend upon younger stands” and to “achieve other desired conditions,” all but eliminating the core purpose of LSRs.

We have concerns that moist matrix stands established after 1905 would be open for commercial logging using “ecological forestry” – a vague term that agencies contend includes forms of clearcutting - as well as opening up stands established between 1825 and 1905 for commercial logging under a long list of rationales.

This shift away from stand age considerations to stand establishment dates essentially means these old stands will never age into protection, severely limiting if not outright curtailing recruitment of additional old growth—especially when combined with new logging loopholes in LSRs.

Management in dry forest ecosystems

In January 2022, Department of Agriculture Secretary Vilsack and Randy Moore, head of the Forest Service, unveiled a 10-year strategy for “confronting America’s wildfire crisis through increased logging, thinning and prescribed fires to reduce high fuel loads”. 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 have concerns about the NWFP amendment proposal to log at least one third of dry forest stands across all land allocations (LSR and Matrix) over 15 years—964,000 acres. The proposal to increase the tree age for nominal protection from logging from 80 years to 150 years cannot be justified as ecologically sound, and is counter to the need to protect mature and old-growth trees. The broad exceptions for “restoration” and “to reduce wildfire risk” are problematic.

Rather than more timber harvest, forest management in dry forests should consider the need to reverse decades of fire exclusion by prioritizing non-commercial fuel treatments and managed use of fire, and protecting fire resistant mature and old-growth trees. This will ensure carbon storage is not lost, and that ecological processes like fire are restored to these forests.

Salvage logging

We have grave concerns about the proposed allowance of post-fire, so-called “salvage” logging in moist LSRs under a number of justifications, including “along existing system roads.” Even fewer restrictions would be placed on salvage logging in dry LSRs, and no real restrictions would exist in matrix.

Salvage logging post-fire landscapes is like ripping a scab off a wound and converts burned areas into sterile tree farms. We do not support this expansion.

Raising Age of Allowed Harvesting

There is no sound scientific reason for redefining what is considered a mature tree, raising the age of allowed harvesting from 80 to 120 years in reserves.

As noted by Van Pelt², “In order to identify mature and old forests, the great diversity of environments present in western Washington must be acknowledged.” These diverse environments create diverse vegetation zones, with different dominant tree species, and different paths and times to achieve mature tree stands. Van Pelt describes several different maturity levels. The Forest Service supports this complexity with a description of a mature forest as in the 2024 report FS-1215a³, page 5:

“Mature forests vary widely in character with age, geographic location, climate, site productivity, relative sense of awe, characteristic disturbance regime, and the values people attribute to or receive from them. Dialogue with stakeholders and Tribal Nations and integration of local and Indigenous Knowledge with evolving scientific understanding are critical in effectively managing mature forests.”

The Forest Service report FS-1215a, which is cited in the DEIS, over many pages describes the complex ecology of mature and old-growth forest stands. It is unreasonable for the DEIS to simply state that an LSR stand may be logged if younger than 120 years. In achieving the goal of recruiting additional and maintaining existing mature and old-growth stands, staying with the existing NWFP restriction on harvesting stands and trees 80 years old and older is appropriate. This is, after all, the original intent of the NWFP, to recruit more mature trees, and increasing the age is counter to that intent.

There are some components of the proposed amendment that we support, and some other concerns we want the Forest Service to address:

Supporting Tribal Sovereignty and Environmental Justice

The Northwest Forest Plan encompasses lands occupied and stewarded by over 80 Tribes since time immemorial. As it considers future management of our national forests, the U.S. Forest Service must uphold its obligation to genuinely consult with Tribes during decision-making processes. This includes providing the resources and support necessary to ensure equitable access to these processes and engaging with Tribes in a way that respects their sovereignty and connection to the Pacific Northwest’s forests and waters. Further, the

² Van Pelt, Robert. 2007. “Identifying Old Trees and Forests in Western Washington.” Olympia, WA: Washington State Department of Natural Resources. <https://www.dnr.wa.gov/programs-and-services/forest-resources/habitat-conservation/identifying-mature-and-old-forests>.

³ USDA Forest Service and USDI BLM. 2024. Mature and Old-Growth Forests: Definition, Identification, and Initial Inventory on Lands Managed by the Forest Service and Bureau of Land Management in Fulfillment of Section 2(b) of Executive Order No. 14072. FS 1215a. April 2024 (revised). 82 pp. Available online: https://www.fs.usda.gov/sites/default/files/fs_media/fs_document/Mature-and-OldGrowth-Forests.pdf

agency should prioritize additional Tribal community engagement and support during the planning process. Any changes to the Northwest Forest Plan should support Tribal access to harvest first foods, accommodate cultural burning practices, promote the use of co-stewardship agreements, and support workforce development and youth education.

To address environmental justice concerns, the Forest Service should conduct a comprehensive analysis at the landscape level of any proposed management changes, including assessment of impacts to air quality, water quality and quantity, climate, recreation, and cultural use. To support and protect workers, the Forest Service should ensure safe, sustainable, and equitable working conditions and fair compensation for any forest management work.

Incorporating Traditional Ecological Knowledge, facilitating Tribal involvement, and addressing environmental justice concerns in the management of our national forests, however, does not require weakening the core conservation protections of the original Northwest Forest Plan. We support the Forest Service moving forward with strong Tribal inclusion and environmental justice components. Pairing such components with the Forest Service's plan for weakened environmental protections, however, is a false choice we do not condone.

Focus on effective fire risk reduction and prevention

Older, moss-draped forests of the Cascade Mountains and Coast Range are fire resistant. Most fuel reduction projects in the highly productive, moist forests of western Oregon and Washington are ineffective. Instead, these projects reduce carbon storage in these carbon-rich forests, thus reducing one of our most effective climate mitigation strategies. Promoting natural fire processes and protecting mature and old-growth trees (the most fire-resistant and carbon rich trees) are essential in dry forests as well. We are concerned that focusing on commercial thinning projects direct limited funds away from more effective strategies.

The most effective fire resilience strategy is preservation of mature and old growth stands. These are the most fire resistant. In particular, many dry forest species have evolved with frequent fire and are fire-resistant, cutting them down removes the most fire resilient components in these forests.

Fuel reduction should focus on non-commercially treating small fuels. Logging commercially viable trees as fuel reduction tends to decrease a forests' resilience to fire by removing fire resistant trees, generating hazardous slash, making the stand hotter-drier-windier, and stimulating the growth of surface and ladder fuels. Fuel and fire risk reduction "treatments" can also have negative impacts on wildlife habitat and seldom result in actual risk reduction because fires don't often intersect with fuel reduction areas during conditions when such treatments are effective.

Non-commercial thinning and fuel treatment should also be prioritized to high-risk locations such as the wildland-urban interface and home ignition zone to protect structures. Forest

management for wildfire protection is most effective in the 60-100 feet zone from structures, “defensible space”: the home outward strategy (Bevington, 2021)⁴.

Fuel reduction should focus on treating small-diameter surface fuels. Commercial logging for fuel reduction has too many corrupting economic influences that can make fuel conditions worse instead of better, such as by removing large fire resistant trees that shelter surface fuels and vegetation from the sun and wind.

Reducing roads is another important way of reducing fire risk, as most human-caused fires start along roads.

Beneficial fire use

There are a number of provisions in the draft EIS regarding beneficial fire use that we support. We recognize that fire is a vital and inevitable ecological process that rejuvenates fire-adapted ecosystems, regenerates fire-dependent species, and maintains habitat mosaics that enhance biodiversity. The misguided era of attempted fire exclusion and aggressive fire suppression across public wildlands must be replaced with a new paradigm of fire inclusion and ecological fire management.

Federal resources should support Tribal fire management programs including an expansion of the Tribal wildland fire workforce and elimination of bureaucratic barriers to implementing cultural burn projects.

Mature and old-growth forests are degraded by conventional firefighting operations that include the use of bulldozers, feller bunchers, chemical retardants, and high-intensity backburns. Mature and old-growth forests are better protected with ecological fire use from proactive prescribed burning rather than reactive aggressive firefighting.

Climate Change and Mature and Old-Growth Ecosystems

While the new Trump administration may have rescinded President Biden’s Executive Order 14072⁵ on Strengthening the Nation’s Forests, Communities, and Local Economies, the fundamental facts and science supporting the importance of protecting all mature and old growth (MOG) trees and forests to address climate change remain. The BLMs are supportive of additional protections for mature and old-growth trees and forests across the country.

⁴ Bevington, Douglas. Working from the Home Outward: Lessons from California for Federal Wildfire Policy. Compiled by D. Bevington, PhD, Forest Program Director, Environment Now. May 5, 2021. <https://environmentnow.org/wp-content/uploads/2021/05/Home-Outward-report-2021-1.pdf>

⁵ USFS. Mature and Old-Growth Forests: Definition, Identification, and Initial Inventory on Lands Managed by the Forest Service and Bureau of Land Management Fulfillment of Executive Order 14072, Section 2(b). April 2023.

Here in the Pacific Northwest, protecting trees that are 80 years or older is important for ecosystem function and has many co-benefits alongside increased carbon storage. An 80-year-old conifer can live for hundreds of more years, absorbing more and more carbon from the atmosphere and storing it in its wood, roots, soil, and supporting diverse wildlife. These are among the most carbon-rich forests in the world, holding more carbon per acre than tropical rainforests. Nowhere else in the *world* are there so many different species of big, long-lived conifers together in one place as in the Pacific Northwest. The NWFP governs the largest natural carbon reserves found in North America and the amendment must prioritize increasing carbon storage.

Researchers throughout the region have documented the value of these forests as carbon reserves because of their massive carbon storage, their fire resistance, and their likelihood to survive for decades or centuries because of their *potential* protection as public forests. In addition, mature and old forests provide the highest proportional area of terrestrial vertebrate habitat for supporting threatened or endangered species. Clearly, these forests are far more valuable standing, holding carbon, cleansing air and water, providing habitat, than being cut for a one-time profit and emitting tons of carbon into the atmosphere.

Law and Moomaw (2024)⁶ report that “In the U.S., forests remove 12% of the nation’s greenhouse gas emissions annually and store the carbon long term in trees and soils. Mature and old-growth forests, with larger trees than younger forests, play an outsized role in accumulating carbon and keeping it out of the atmosphere. These forests are especially resistant to wildfires and other natural disturbances as the climate warms.”

Protecting these older forests can also help contribute to the goal of conserving 30% of land and water by 2030 (30x30). There are nearly 11 million acres of MOG in federal forests in Oregon and Washington (about 19% of the lower 48 states). Despite the important role they play in carbon storage and climate mitigation, only about 24% of MOG on federal land in our two states are fully protected from logging (GAP 1 & 2 designation). The remainder have varied levels of protection, some under the Northwest Forest Plan, in Late Successional Reserves, or in Inventoried roadless areas (which may be subject to post-fire logging.) This analysis was released in a mapping study by DellaSala et al. in 2022.⁷

⁶ Law, B.E. and W. Moomaw. 2024. Old forests are critically important for slowing climate change and merit immediate protection from logging. The Conversation. <https://theconversation.com/old-forests-are-critically-important-for-slowing-climate-change-and-merit-immediate-protection-from-logging-220771>

⁷ DellaSala, Dominick A., Brendan Mackey, Patrick Norman, Carly Campbell, Patrick J. Comer, Cyril F. Kormos, Heather Keith, and Brendan Rogers. Mature and old-growth forests contribute to large-scale conservation targets in the conterminous United States. *Frontiers in Forests and Global Change*, September 28, 2022. <https://www.frontiersin.org/articles/10.3389/ffgc.2022.979528/full>

Law et al (2022) proposes strategic reserves in Oregon forests for biodiversity, water and carbon to mitigate and adapt to climate change⁸. The researchers look at ways of achieving the Executive Order 14008 goal of “conserving 30% of our land and waters by 2030.” They also look at preservation targets of 50 x 50 proposed by the Intergovernmental Panel on Climate Change. They state that *“protecting mature and old growth forests on federal lands fulfills an urgent need for protection and provides a low-cost way to simultaneously meet national and international goals.” (Emphasis added.)* The Pacific Northwest forests, especially on the moist western part, are carbon dense, with a high potential for climate mitigation, and also lower vulnerability to wildfire. Selection of areas for the highest priority for preservation were ranked by aboveground carbon stocks, biodiversity, and climate resilience. They defined landscape resilience as the capacity of a landscape or ecoregion to maintain biological diversity and ecological function despite climate change. They identified areas not currently protected that could be strategically protected at GAP 1 or 2 (USGS ratings). About 10% of Oregon’s forests currently are fully protected.

The proposed amendments to the NWFP undermine these goals by allowing increased logging/harvest in MOG forests, leading to increased ecosystem fragmentation and carbon emissions.

Acknowledge and protect the co-benefits of protecting older forests

Biodiversity is strongly associated with mature and old-growth forests. The Northwest Forest Plan was devised to protect old-growth-dependent threatened and endangered species. Prohibiting logging in MOG forests, as originally defined as 80 years and older, would better protect Threatened & Endangered species, and benefit a wide range of wildlife and plant species.

Harvest prohibition of MOG preserves streamflow and summer flows. Downstream drinking water has better water quality and quantity. One study evaluated the long-term impact of forest harvest on summer low flow deficits in the Oregon Coast Range⁹. The study found streamflow was 50% lower in a 40–43-year-old plantation relative to a nearby 110-year-old forest. Summer low flow deficits persisted over six months or more each year. Thus, logging prohibition of MOG will also provide better habitat for aquatic species.

Retention of water in the stream and riparian zone can also provide a natural fuelbreak, with higher water content of riparian vegetation. The wider riparian zones also serve as wildlife refugia during wildfires.

⁸ Law BE, Berner LT, Mildrexler DJ, Bloemers RO and Ripple WJ (2022). Strategic reserves in Oregon’s forests for biodiversity, water, and carbon to mitigate and adapt to climate change. Front. For. Glob. Change 5:1028401. <https://doi.org/10.3389/ffgc.2022.1028401>

⁹ Segura, Catalina, Kevin Bladon, Jeff Hatten, Julia Jones, Cody Hale, George Ice. Long-term effects of forest harvesting on summer low flow deficits in the Coast Range of Oregon. Journal Of Hydrology, Volume 585, June 2020, 124749. <https://doi.org/10.1016/j.jhydrol.2020.124749>

Sustainable economic opportunities and communities

It has been more than 30 years since the Northwest Forest Plan drafted a roadmap to help timber-dependent communities create more sustainable economic futures. Most of these mill towns have succeeded in diversifying their economies without cutting the last old forests on public land. The remaining communities have had an entire generation to uncouple their dependence on publicly owned forests. [See also: Beverly Law, “Wildfire in a Warming World: Opportunities to Improve Community Collaboration, Climate Resilience, and Workforce Capacity,” Statement to the United States House of Representatives Subcommittee on National Parks, Forests and Public Lands. April 29, 2021.]

The proposed amendment does not adequately recognize that the socioeconomic benefits of the Northwest Forest Plan include much more than wood products. The economic benefits of clean water, biodiversity, watershed protection, climate stability, fire moderation, recreation, and quality of life need to be recognized as first-order economic benefits of forest conservation. We understand that these benefits can be hard to quantify, but they should not be overlooked and they should be weighed accordingly. For example, outdoor recreation on public lands is a growing industry, employing more than 5 million people across the country in 2022¹⁰, whereas the timber industry has a declining fraction of the region’s economy.

Ongoing restoration of forests and watersheds is also an important part of the economy in the region. From improving salmon habitat by replacing culverts and removing roads, to non-commercial fuels treatments and prescribed fire in ecologically-appropriate areas, the restoration economy can provide jobs and learning opportunities, and benefit from Indigenous co-management principles.

In conclusion, we strongly oppose the elements of the Northwest Forest Plan amendment that significantly expand commercial logging in mature and old-growth forests across the Pacific Northwest. Our region is facing twin extinction and climate crises, and this proposal would make both of them worse. We support reforms that would result in better consultation, co-stewardship, and integration of Indigenous perspectives into the management of our national forests. The Forest Service can and should improve Tribal inclusion and environmental justice in forest management while at the same time preserving and advancing ecological protections in our national forests. However, any amendment to the Northwest Forest Plan that weakens core protections for mature and old-growth forests and the suite of water quality, species habitat, and carbon storage values they provide should not move forward.

Our Great Old Broads for Wilderness chapters raised many of these points and concerns in the scoping period of the Northwest Forest Plan amendment in 2024. We appreciate the opportunity to provide comments on the DEIS and hope they inform a final amendment that addresses our concerns.

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<https://headwaterseconomics.org/economic-development/trends-performance/outdoor-recreation-economy-by-state/>

Sincerely,

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