



Howard Lake, Mt. McGregor Trail, above Stehekin Valley, Stephen Mather Wilderness, North Cascades National Park Service Complex, Washington state, June 2024, photo Teri Shore

March 7, 2025

United States Forest Service

1400 Independence Ave., SW

Washington, D.C. 20250-0003

SENT VIA PUBLIC COMMENT PORTAL

Re: Northwest Forest Plan Draft Environmental Impact Statement – Public Comment

Summary: The proposed changes to the Northwest Forest Plan undermine and reverse decades of forest stewardship; none of the proposed alternatives are supported; instead USFS needs to create a new alternative that prioritizes protection and conservation of forests, habitats and species, prevents negative environmental impacts to wilderness areas surrounded by impacted forests, and that includes tribal consultation and co-management.

Dear USFS,

Please accept these public comments from the following individuals for the Northwest Forest Plan (NWFP) Draft Environmental Impact Statement (DEIS). We are all people from the North Bay Area in

Marin and Sonoma Counties, California, who vote and care for, recreate in, help to restore, volunteer in and work to conserve the forests and public lands covered by the NWFP. We support the highest level of stewardship on our treasured public lands and the continued and enhanced legacy of the NWFP.

Overall, we reject all of the alternatives proposed in the NWFP DEIS as they undermine and reverse decades of forest stewardship and instead seem intent on taking the last remnants of old growth forests, degrading habitats, and weakening endangered species habitats under the guise of wildfire management, re-opening timber mills and potentially growing the polluting biomass energy industry.

The USFS needs to create a new alternative that protects forests, habitat and species at least to the level of the current NWFP--though stronger protections are warranted as well—that prevents negative environmental impacts to designated wilderness areas, national parks, and preserves (referred to primarily as Congressionally Reserved Areas in the DEIS) that are contained in the impacted forests; and that includes tribal consultation and co-management and addresses Environmental Justice.

The proposed amendments to 30-year-old federal protections for forests, old growth reserves and spotted owls would allow for the doubling or even tripling of commercial logging and threaten old-growth trees and multiple wilderness areas on a vast 24 million acres of public lands stretching from Northern California to Oregon and Washington. We cannot support these changes. Instead, we urge the USFS to restructure the proposed NWFP changes to prioritize conservation, habitat and endangered species protection, climate health and accurate carbon accounting, wilderness character and values, tribal consultation and co-management and environmental justice.

Wilderness + Cumulative Impacts

Wilderness lands are grouped in the NWFP under Congressionally Reserved Areas (CRAs) that include wild and scenic rivers, and national parks and monuments totaling 7 million acres and about 30 percent of the total area covered.

While commercial logging would remain banned in wilderness areas, exemptions in the Wilderness Act for wildfire management opens the door to mechanized thinning and logging operations that are already bulldozing swaths of forest land, such as in designated wilderness in Mt. Hood and Willamette Valley National Forests in Oregon and Washington, respectively.

In other NWFP land use designations including Late Successional Reserves (LSAs) and Riparian Reserves (RR), increased commercial logging and tree removal with associated disturbance from heavy equipment and new roads and fuel, are sure to have direct negative environmental impacts on the forests, habitat and wildlife like the spotted owl. These cumulative actions will threaten the character and value of adjacent wilderness. It did not appear that these indirect impacts on wilderness were analyzed nor mitigated in the DEIS; and should be under NEPA.

National Parks and Preserves

Similarly to wilderness areas, the cumulative impacts to national parks and preserves and other lands categorized as CRAs within the NWFP from the proposed alternatives in the DEIS were not analyzed nor mitigated in the DEIS and should be under NEPA. As proposed, the changes to the NWFP are likely to further fragment and degrade the adjacent watersheds and ecosystems in national parks and preserves. This is a major failing of the DEIS.

Old Growth and Late Successional Reserves (LSRs)

The USFS must reject the proposal to change the age status of “old growth” forest stands from 80 years old to 120 years old. Forest stands would now be considered “young” even if they are 120 years old—a major change from the previous NWFP definition of “mature” stands as 80 years old.



Headwaters Preserve, Humboldt County, CA, Legacy of the NWFP, photo courtesy of <https://www.visitedwoods.com/listing/headwaters-forest-reserve/488/>

Rather than continue to prohibit logging activities in moist LSRs unless they restore or accelerate late-successional or old-growth conditions to benefit 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.

In response we demand that the proposed age definitions of Old Growth remain at 80 throughout the plan area with no cuts after that age in both moist and dry forests.

The DEIS reveals that the USFS is planning to take all trees in moist forests under 120yrs and all trees in dry forests under 150yrs. We strongly oppose this amendment.

We need mature forests and old growth that take hundreds or even thousands of years to grow. In the Northwest, we’ve already lost at least 75 percent of our ancient forests due primarily to commercial logging. Now more than ever to increase climate health and resiliency we need to save what we have left from commercial logging and other activities such as aggressive wildfire treatments and salvage logging for future generations.

Old growth forests are essential for:

- Safeguarding biodiversity and
- Establishing climate refugia
- Reducing flood and erosion risk
- Providing clean, cold drinking water
- Fire resilience
- Cultural values
- Outdoor recreation and
- Mental and spiritual well-being

Endangered Species

The proposed alternatives weaken protection for the Northwest Forest Plan’s forests, clean water, endangered and threatened species such as the Northern Spotted Owl, salmon and bull trout, and wildlife habitat, substantially weakening the science-backed, ecosystem-driven vision of the original plan.



USGS photo
<https://www.usgs.gov/media/images/northern>

The DEIS fails to take into consideration the whole purpose of the 1994 original NWFP – to take into consideration the protection of Northern Spotted Owl (NSO). The DEIS fails to take into consideration the 2012 critical designated habitat protections of the NSO. The DEIS disregards the fact that the NSO is the indicator species for all old growth dependent species.

The USFS must address these deficiencies in the DEIS for the proposed amendments to the NWFP.

Commercial Logging

There is little rationale in the DEIS ecologically or economically for doubling or tripling of commercial logging from 2023 levels in our already decimated forests. The proposed amendments call for cutting one BILLION board feet of wood from our public forests. This amounts to more cutting concentrated on fewer forests under the NWFP since the BLM withdrew millions of acres of forest that are no longer under the NWFP.

In addition the proposed amendments include plans to “treat” 2.65 million acres per decade across all land use allocations—the equivalent of two and a half Mt. Hood National Forests—with all the attendant adverse impacts from associated road-building and heavy machinery use.

The American public and the forests and wild lands that they treasure will never benefit from such mass destruction. It is a backward, short-sighted approach that will only enrich timber companies and their shareholders with short-term profits.

The DEIS needs to analyze and mitigate the long-term ecological and economic impacts of the proposed amendments and explain to the American public why such measures are proposed.

Outdoor Recreation

The DEIS does not consider the effects its proposed increased logging will have on outdoor recreation opportunities. Outdoor recreation is one of the primary economic drivers in Pacific Northwest forests covered by the NWFP. Timber harvest usually requires large area closures during and following implementation that disrupts these recreation activities and access. There are myriad economic benefits from leaving landscapes intact, including recreation, fishing, and water quality. The Forest Service must analyze these economic benefits in the Final EIS.



Backpacker at Caribou Lakes in Trinity Alps
Wilderness in Shasta-Trinity Forest

Wildfire “Treatment”

We strongly oppose the proposed wildfire management “treatment” along with any salvage logging after wildfires. Forest science is increasingly demonstrating that while long-time wildfire suppression is a major problem for the health of our forests, that stripping forests of vegetation and removing burned trees from the forest are just as problematic—and tend to create conditions that allow hotter, bigger wildfires to spread more quickly and easily.

The DEIS calls for complete removal of the 1994 restrictions on salvage harvest as indicated in Appendix B; and doesn’t address the significant impacts of salvage harvest on regeneration, regrowth, and recovery, nor use of salvage on the viability of threatened and endangered species dependent on forests. DEIS must analyze and mitigate these deficiencies.

When it comes to prescribed burns, many or perhaps even *most prescribed burns these days* are associated with logging up to 60% of the mature trees - this is the fine print that no one notices re: prescribed burns. Current science questions those types of prescribed burns (due to massive carbon emissions, forest/chaparral/wetland/soil destruction).

The DEIS does not reveal the significant impacts of increased use of prescribed fire and cultural fire in old growth stands and all forest land or on threatened and endangered species habitat. The USFS must address these deficiencies in the DEIS.

The DEIS must consult the most recent and best available science on wildfire “treatment” such as salvage logging and burning and analyze and impacts and mitigation before moving forward any changes to the NWFP.

Ultimately, the USFS should invest more in home hardening and defensible space for homeowners and enterprises that are situated in the Wildland-Urban Interface if protecting lives and homes is the priority.

Carbon Emissions and Accounting

While the DEIS addresses the carbon sequestration benefits of conserving forests, it fails to account for the massive carbon emissions that are emitted from logging including the use of heavy equipment, road building and related activities. These emissions must be analyzed and mitigated in the DEIR before the changes to the NWFP move forward.

Tribal Consultation and Co-Management

While we don’t claim to represent tribes or have traditional knowledge, we do support the inclusion of tribal consultation and sovereignty, forest co-management and traditional knowledge.

Adequate Staffing and Funding

The Forest Service must ensure that our public forests are appropriately staffed and funded at all levels to ensure conservation and stewardship that protects old growth and all forest lands, habitat, endangered species, watersheds and ecosystems.

Sincerely yours,



Teri Shore, Sonoma, CA

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List of citations where some comments were sourced, most comments original to signers

Sources: Initial Analysis of Northwest Forest Plan Amendment Draft Environmental Impact Statement Alternatives; Oregon Wild, Bird Alliance of Oregon, Cascadia Wildlands and Wild Earth Guardians, December 2024

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