



MOUNT SHASTA BIOREGIONAL ECOLOGY CENTER
Honoring and Protecting our Mountain Environment Since 1988

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Submitted electronically to:

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

Dear Regional Foresters Buchanan and Eberlien:

Please accept the following comments on the **Northwest Forest Plan Amendment (NWFP) Draft Environmental Impact Statement (DEIS)** from the Mount Shasta Bioregional Ecology Center (MSBEC), representing bioregional advocates who seek to ensure the long-term prosperity of public forests in the Northwest. MSBEC, a bioregional organization established in 1988, has dedicated itself to preserving, protecting, and restoring the Mount Shasta bioregion. We have cultivated longstanding partnerships with Tribal Nations within our bioregion to comprehend the intricate relationships that indigenous peoples have with the landscape. We have also collaborated closely with the three National Forests that intersect the Mount Shasta bioregion.

The Northwest Forest Plan (NWFP) has guided management of 17 national forests stretching from western Washington and Oregon, south to northwestern California. The plan attempted to curb the destructive over-logging of our forests and protected habitat for salmon, northern spotted owls, marbled murrelets, and many other species. It also tried to safeguard watersheds and provide climate benefits, while still allowing commercial logging. Despite the lofty ambitions of the first plan, it has been clear to many in the conservation community, that it has largely failed to curb the collapse of biodiversity in forested ecosystems. None of the action alternatives in the DEIS meet the 100-year



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timeline of the NWFP in restoring the ecological integrity of late-seral forests and dependent species.

The DEIS proposes increased mature and old-growth tree logging, which is often justified using subjective terms such as “resilience,” “climate-smart,” and “stewardship.” The removal of large trees for any commercial purpose remains controversial and is not “ecologically appropriate,” “stewardship,” “restoration,” or “climate-friendly” (all terms used in the DEIS). Incidental removal of large trees for road construction or hazard mitigation must also be subject to increased scrutiny.

Given that carbon sequestration primarily occurs in mature and old trees, which represent the largest above-ground carbon sink, it is imperative to refrain from removing mature or old-growth trees for commercial purposes. There is no scientifically proven method to compensate for the carbon loss incurred during the logging of mature and old-growth trees. The DEIS fails to thoroughly examine the application of proper carbon accounting and life cycle analysis, and it exhibits a significant bias towards suggesting that the wood product pool constitutes a substantial portion of retained carbon. Logging and road construction generate substantially higher emissions compared to natural disturbances. Furthermore, increasing the permissible age of trees for harvest would lead to a substantial increase in carbon emissions to the atmosphere.

We have identified that the DEIS employs flawed and selective studies to assert that fire poses a greater threat to the Northern Spotted Owl (NSO) than logging. Furthermore, the DEIS selects scientific evidence that supports the notion that substantial logging within owl territories is necessary for the conservation of NSO populations.

Over the initial three decades of the NWFP, it became evident that habitat loss due to logging has endangered this indicator species. Despite the Endangered Species Act’s mandate for the recovery of listed species, the NSO is on the brink of extinction. Continued logging in NSO habitat will only accelerate its demise. Notably, the DEIS fails to provide research that underscores the significance of NSO habitat as fire refugia.

The older habitat favored by NSO tends to burn at lower severity, even in areas with higher tree density and canopy closure. This information has been published by the Forest Service’s own research branch.

Roads significantly impact the NWFP area, increasing the risk of wildfires, wildlife mortality (collisions, poaching), water quality issues (sediment runoff), and invasive species spread.



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The DEIS should include more details on road impacts, and consider decommissioning problematic roads that impact water quality, cause habitat fragmentation, and closing roads seasonally to reduce human-caused fires or pathogens like *Phytophthora lateralis*.

Based on Forest Service NWFP monitoring reports, riparian areas and watersheds in general have been improving as a direct result of reduced timber harvest under the NWFP coupled with road decommissioning. The DEIS should capitalize on this success by suspending commercial logging within riparian areas, decommissioning more roads on steep slopes or fragile soils, improving failing culverts to handle more rain-on-snow events, and installing more water bars to limit sediment transport into streams from the road prism. Water quality remains impaired by roads and other stressors such as livestock grazing. The DEIS should conduct a comprehensive cumulative impacts analysis on these stressors and the excessive road densities in the plan area, as the preferred alternative would only exacerbate these degrading stressors.

The amendment should recognize the wide variety of social and economic benefits national forests provide for local communities and the region as a whole – not just timber, but also clean water, climate stability, quality of life, and outdoor recreation opportunities.

The original plan failed to include input from Tribal Nations or incorporate Indigenous Knowledge and stewardship practices in forest management. The DEIS makes important progress toward allowing more tribal management participation. We support the objectives of allowing more tribal cultural burning where it meets ecological and cultural objectives. These practices will help redress decades of unbridled industrial logging that has occurred with only the minimum legal requirements of tribal consultation.

We would conclude by adding that none of the action alternatives align with the original purpose of the Northwest Forest Plan. Expanding logging would reverse the decades of progress made, increase climate impacts by releasing emissions from cutting down large trees, cause cumulative effects from logging, roads, livestock, and invasive species. Increased harvest will also exacerbate climate change, damage wildfire and climate refugia properties of the late succession reserves and mature forests, and likely lead to a jeopardy determination for the NSO and other endangered species.

Thank you for the opportunity to comment,
Nick Joslin, Forest and Watershed Watch Program Manager
Mount Shasta Bioregional Ecology Center