

March 17, 2025

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

Re: Northwest Forest Plan Amendment Draft Environmental Impact Statement

Dear Regional Foresters Buchanan and Eberlien:

Please accept the following comments on the Northwest Forest Plan Amendment (NWFP) Draft Environmental Impact Statement (Draft EIS) from the undersigned groups, representing tens of thousands of advocates who wish to see public forests in the Northwest thrive for generations to come.

For 30 years, the Northwest Forest Plan (NWFP) has guided management of 17 national forests stretching from western Washington and Oregon, south to northwestern California. The plan curbed the destructive over-logging of our forests and protected habitat for salmon, northern spotted owls, marbled murrelets, and many other species. It also safeguarded watersheds and provided climate benefits, while still allowing commercial logging.

Despite its successes, the plan failed to include input from Tribal Nations or incorporate Indigenous Knowledge and stewardship practices in forest management. These practices will help redress decades of unbridled industrial logging.

On March 1, Donald Trump signed an executive order entitled "[Immediate Expansion of American Timber Production](#)," calling on federal land managers to "fully exploit our domestic timber supply," and instructing agencies to bypass existing federal laws and regulations that protect statelike forests, rural communities, clean water, imperiled species, recreation, and the climate. This directive wrongly seeks to elevate timber production above all other forest uses and values. This would lead to disastrous outcomes for public forests and our groups adamantly oppose its implementation in the Northwest Forest Plan area.

We face worsening climate change, biodiversity loss, and uncharacteristically severe wildfires, and we need an ecologically sound and socially just plan that not only ensures intact, thriving ecosystems, but also meaningfully respects Tribal sovereignty, to guide us into the future.

We ask the agency to support or improve analysis of the following components in the Final Environmental Impact Statement and any resulting decision:

1. **Support Tribal Sovereignty and Indigenous Knowledge:** Any decision made by the Forest Service should advance all of the Tribal Inclusion components analyzed in each of the action alternatives in the Draft EIS. The Forest Service should collaborate with Tribes to identify and manage for desired ecological conditions and support Tribal management for first foods and species as defined by Tribes. The agency should revise and further expand the Tribal Inclusion section in the Draft EIS to provide a more comprehensive analysis that reflects the breadth and importance of the proposed plan components to Indigenous communities and more accurately discloses the impacts of the proposed amendment on Tribes.
2. **Elevate Environmental Justice:** The Forest Service should address environmental justice by analyzing impacts on air, water, and communities and ensuring fair, sustainable working conditions.
3. **Ensure Recreation Access:** The Forest Service Draft EIS does not consider the effects its proposed increased logging will have on outdoor recreation opportunities in the region. Outdoor recreation is one of the primary economic drivers in the region, and 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.
4. **Ensure Adequate Staffing and Funding:** The efficacy of the Forest Service's proposed logging to reduce wildfire hazards in the region will depend on the work being done in the appropriate forest type, what the logging prescriptions are, and ensuring post-logging treatment of slash piles and repeated burning and follow up treatment/removal of undergrowth vegetation responses. The Forest Service must ensure that these practices are appropriately staffed and funded, otherwise logging will only increase fire risk.

We also request the agency exclude any components in the final plan that would lead to the following outcomes:

5. **Weakened Protections for Mature and Old-Growth Forests:** We support the parts of the proposed amendments that provide long-overdue protections for mature and old-growth forests. Communities value these areas because they are resilient to wildfire, provide essential habitats for a host of imperiled species, store carbon, serve as climate refugia, and protect water quality. However, the draft amendments redefine these forests in a way that leaves far too many of them open to logging and road building. The Forest Service has no social license for commercially exploiting mature and old-growth forests.

6. **Altered Purpose of Late-Successional Reserves (LSR):** In the Draft EIS, the Forest Service proposes expanding the purpose of LSR management to include the “restoration” of habitat for species that depend on young forests. Restoring young forests is a euphemism for regeneration harvest, and including this as a LSR objective directly contradicts the purpose and role of these reserves, which were designed to achieve late-successional and old-growth characteristics. The shift would inappropriately allow new and unprecedented regeneration harvest in these reserves. While our organizations support management to restore traditional and historic oak woodlands and other meadow habitats, provisions to facilitate this management exist elsewhere in the plan. If the Forest Service genuinely wanted to restore young forest habitat, it would not permit salvage logging following natural disturbances. This change to the fundamental purpose of these reserves undermines the reserves network’s purpose and efficacy and will increase fire risk across the planning area.
7. **Weakened Protections for Imperiled Fish and Wildlife:** The Draft EIS encompasses changes that radically alter the fundamental assumptions and management of forest habitats depended upon by a host of wildlife species, including the northern spotted owl, marbled murrelet, marten, red tree vole and numerous imperiled aquatic species, including salmon. The effects of the proposed changes on these species and their habitats must be properly analyzed and considered by the decision maker.
8. **Fire Resilience Efforts That Remove Mature Trees:** Fire risk reduction efforts should focus on community preparedness and home hardening. Any logging practices that may be used to increase fire resilience must focus on retaining the larger-diameter trees in the stand, work to increase overall tree diameters in the stand in the short-term, and avoid negative impacts to wildlife and carbon storage. These treatments must also be accompanied by prescribed burning, as studies have shown thinning alone to be ineffective at altering wildfire behavior. These treatments also have no ecological justification in moist forests.
9. **Alterations to the Survey and Manage Program:** The Draft EIS discusses recommendations to eliminate the Survey and Manage program that documents and protects unique and uncommon species and their unique habitats. We agree with the Forest Service’s conclusion that any changes to this program are outside the scope of the proposed amendment and cannot be addressed through this process. This program is vital and should continue.
10. **Expansions to the Road Network:** The Draft EIS fundamentally fails to consider impacts from road construction, which could harm key watersheds, drinking water, and habitat for salmon and other species, and increase the costs of proposed logging. The Forest Service should be focused on reducing the overall road network in the Northwest Forest Plan area. The Draft EIS as written mandates aggressive timber targets that will require extensive road construction or reconstruction. An analysis of the requisite road effects is necessary to inform a responsible decision on this amendment.

In summary, we need a strong forest plan that ensures robust Tribal inclusion, advances ecologically-sound forest management for biodiversity, wildfire resilience, and climate stability, and supports the needs of current and future generations. There are positive steps outlined in

the proposed amendments related to robust Tribal inclusion and beneficial fire use. There are also shortcomings in the proposed amendments that would place remaining mature and old-growth public forests at risk and hinder recovery of imperiled fish and wildlife species and their habitat. If the Forest Service fails to remedy these shortcomings in the Final EIS, our groups are prepared to challenge them.

Thank you for your consideration.

Sincerely,

Grace Brahler	Wildlands Director	Cascadia Wildlands	Eugene, OR
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