

March 17, 2025

To: U.S. Department of Agriculture

I am writing to comment on the Draft Environmental Impact Report of the Proposed Amendment to the Northwest Forest Plan. I support option C, although even this option does not provide enough protection for old growth forest ecosystems required for endangered and threatened fauna's survival. In addition to choosing option C, the Forest Service should protect virtually all old growth forests and ancient trees (that is, older than 80 years old) and manage the forests to increase the acreage for old growth stands over time.

Below, I mention two species of particular concern, the Marbled Murrelet and the Northern Spotted Owl. However, these are only two of many species that utilize old growth ecosystems and are threatened by its degradation.

Marbled Murrelet

The USFS produced a report in 2021 summarizing the status and trajectory of the population of the marbled murrelet in the NWFP region (McIver, 2021). The following quotes are excerpted from that document.

"A conservation goal of the NWFP is to stabilize and increase murrelet populations by maintaining and increasing nesting habitat."

"Both the NWFP (FEMAT 1993) and the species' recovery plan (USFWS 1997) anticipated a challenge in maintaining murrelet populations for 50 to 200 years, until new nesting habitat develops. In light of observed trends in at-sea abundance, our findings underscore the importance of the goal to maintain existing nesting habitat."

Overall, the study concluded that we are not making progress with a net overall population improvement of approximately zero (with some loss in the north and some gain in the south).

My specific request is that the Forest Service implement a management plan that protects the marbled murrelet and then verifies that the protection is effective before proceeding to reduce the protection of old growth forests and trees older than 80 years old.

Northern Spotted Owl

The Northern spotted owl is still in decline (Franklin, 2021). Competition from the barred owl is often cited as a primary cause. If we look a little deeper at why the barred owl is “winning”, it becomes clear that modification of the core habitat (i.e. logging of old growth), is a core reason why this is taking place. Barred owls use a wider variety of nesting sites including younger stands. Sadly, barred owl removal is apparently effective at stemming losses of spotted owls (Wiens, 2021). We have created an unfortunate situation that requires this or other abatement strategies to buy time until sufficient mature habitat can be re-established for the Northern spotted owl to have a stable block of habitat. Displacement of spotted owls by barred owls may have further negative effects as the barred owl is a more omnivorous predator that may threaten vulnerable species such as salamanders and shrews (Baumbusch, 2023).

Again, the root cause of the species decline is Forest Service removal of old growth forest ecosystems, despite existing plans.

Conclusion and Support Statement

Many other species are dependent on mature and old-growth habitat for their survival. Given the lack of progress, we must do more to protect and recruit mature and old-growth forests.

The most desirable alternative of the proposed amendment is Option C, but it does not go far enough to ensure the survival of these species. Specific recommendations to improve the likelihood of species survival include:

- Adoption of Option C which, among other things, maintains the 80-year criterion as opposed to the 120-year criterion.
- Reject the idea of changing from stand age to “stand establishment dates.” This insidious proposal will largely prevent the recruitment of new mature stands and allow logging in older forest which is desperately needed to build mature forest for the future.
- Please maintain species specific management plans for threatened and endangered species within the region.
- Regardless of which criterion is adopted, all old stands should be permanently protected and exempt from thinning. Old stands in the matrix, especially those that have never been cut, should be changed to a protected status.

- Late Succession Reserves should be strategically expanded to create larger blocks of mature habitat and connected with corridors of mature forest for species mobility.

In conclusion, I urge the USDA to adopt Option C as the preferred alternative in amending the Northwest Forest Plan. This option represents the most balanced and forward-thinking strategy for ensuring the health, resilience, and sustainability of our forests.

Thank you for considering my comments. Please feel free to contact me if you have any questions or require additional information.

Sincerely,

Grant Pease

References:

Status and Trend of Marbled Murrelet Populations in the Northwest Forest Plan Area, 2000 to 2018 William R. McIver, Scott F. Pearson, Craig Strong, Monique M. Lance, Jim Baldwin, Deanna Lynch, Martin G. Raphael, Richard D. Young, and Nels Johnson (2021)

2) Range-wide declines of northern spotted owl populations in the Pacific Northwest: A meta-analysis, Alan B. Franklin et al, 2021, Biological Conservation 259(suppl):109168

3) Invader removal triggers competitive release in a threatened avian predator, Wiens et al, 2021, <https://doi.org/10.1073/pnas.2102859118>

4) Baumbusch, Ryan. 2023. Foraging ecology of barred owls where they are outcompeting the threatened northern spotted owl. Oregon State University, Phd Thesis.
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