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Comments: Subject: Northwest Forest Plan DEIS Comment Date: March 13, 2025

To: Regional Foresters Jacque Buchanan and Jennifer Eberlien

The Earth Law Center urges the U.S. Forest Service to take meaningful steps to protect the mature and old-growth forests of the Pacific Northwest. We have fought tirelessly to defend the legacy forests of the Elwha Watershed in Washington State and understand it is our responsibility to continue to protect nature for its intrinsic value, for our climate, and for generations to come. These forests are invaluable not only for their ecological, cultural, and climate benefits but also for their intrinsic worth as living ecosystems that should be allowed to exist for their own sake, beyond human utility. Please accept this comment on the draft EIS for the proposed Northwest Forest Plan amendment.

The Northwest Forest Plan has played a critical role in preserving ancient forests, safeguarding clean water, and supporting wildlife that depend on these ecosystems. However, we are deeply concerned that the proposed amendment to the Plan weakens protections for our region's forests, clean water, and wildlife habitat. If enacted, these changes would double or even triple logging levels across our public forests, open mature and old-growth trees to chainsaws, and sideline the protections that communities, wildlife, and ecosystems depend on.

Mature and old-growth forests are irreplaceable ecological treasures. These forests provide critical habitat for imperiled species like the northern spotted owl, marbled murrelet, and coho salmon. They serve as natural carbon storage systems, helping to mitigate climate change, filter our drinking water, and regulate local temperatures. Forests are not simply timber stockpiles; they are complex, living communities that have intrinsic value beyond their economic benefits.

The current draft amendment dangerously weakens protections for these ancient ecosystems. By allowing increased clear-cutting in mature and old-growth forests, particularly in Late-Successional Reserves and dry forest zones, the plan jeopardizes the integrity of the very ecosystems the NWFP was designed to protect. Instead of fragmenting and degrading these forests, the Forest Service should be focusing on preserving and expanding old-growth protections, ensuring their longevity for generations to come.

A promising aspect of the DEIS is its support for Indigenous-led stewardship, cultural harvesting, and beneficial fire practices. Indigenous communities have cared for these lands since time immemorial, and their deep ecological knowledge should be at the heart of any forest management plan. It is crucial that the Forest Service retains and strengthens the provisions of Alternative B that promote co-stewardship agreements, cultural fire use, and expanded Indigenous leadership in land management. However, these provisions must not be used as leverage to justify increased commercial logging under the false premise of "forest health" treatments.

Science has shown that mature and old-growth forests are naturally more fire-resistant than young, clear-cut plantations, which burn at much higher severity. Protecting and restoring old-growth forests should be a fundamental strategy in addressing wildfire risk. Fire management should prioritize non-commercial, science-backed approaches like Indigenous cultural burning and small-diameter thinning around communities rather than large-scale logging operations that increase long-term fire hazards.

Preserving biodiversity and connected wildlife habitat across the region should be a core principle of this forest plan amendment. This includes not only threatened species, but others that have been impacted by the loss and fragmentation of their habitat, and those awaiting state and/or federal Endangered Species Act listing decisions.

The amendment should recognize the wide variety of social and economic benefits National Forests provide for local communities and the region as a whole [ndash] not just timber, but also clean water, climate stability, quality of life, and outdoor recreation.

Fire resistance and resilience can be bolstered by preserving and restoring mature and old-growth forests. Fuels and fire management should focus on the home ignition zone and on non-commercial treatments and beneficial fire use, not commercial logging. Indigenous cultural burning and wildland fire use should be prioritized. Commercial logging for fuel reduction can negatively impact wildlife habitat, remove large fire-resistant trees, introduce invasive species, and create hazardous fire conditions. Standards must ensure that fuel reduction is both needed and effective before logging is allowed.

The Forest Service must reject plans to weaken core protections of the Northwest Forest Plan, and do the following:

- \* Strengthen protections for mature and old-growth forests to ensure habitat, water quality, and carbon storage, and recruit more mature and old forests to restore a functional ecosystem.
- \* Maintain or expand protections for the network of forest reserves to allow natural processes to flourish, ensure connectivity for wildlife, and support the recovery of imperiled species. Any reduction in forest reserve protections would increase harmful impacts such as habitat destruction, sediment in streams, and carbon loss, further endangering sensitive ecosystems.
- \* Genuinely consult with Tribes, respect their sovereignty, and provide resources to support their full participation in decision-making. The Forest Service must support co-stewardship agreements, cultural burning practices, first food harvesting, and youth education while ensuring equitable access to planning processes. Pairing these components with the Forest Service's plan for weakened environmental protections is a false choice manufactured by the agency.
- \* Address environmental justice by analyzing impacts on air, water, and communities and ensuring fair, sustainable working conditions.
- \* Shift wildfire strategies to prioritize community safety and proven prevention measures over logging.

The Northwest Forest Plan should help us move towards a more livable future, not take us backwards toward the

destructive logging practices of the past. We urge the Forest Service to adopt an alternative that prioritizes both Tribal sovereignty and meaningful, enforceable protections for mature and old-growth forests, clean water, biodiversity, and our collective future in the face of climate change.

Thank you for your consideration. Elizabeth Dunne, Esq.

Director of Legal Advocacy Earth Law Center

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ATTACHMENT-LETTER TEXT: Northwest Forest Plan Comment.pdf; this is the same content that is coded in text box; it was originally included as an attachment