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Dear Regional Forester Jacque Buchanan and Regional Forester Jennifer Eberline,

The Northwest Forest Plan (NWFP) as developed in 1994 and implemented on the western Oregon, Washington and northwestern California National Forests and the Oregon BLM lands west of the Cascade Range was a stellar attempt to manage the forests with care for the old growth-related species. These species have been hanging on to survive in the small amount of land populated with large trees capable of sustaining their populations. This was to be a one-hundred-year effort to develop the old growth character of these mountain ranges. Only 30% of the way into this plan, the proposals laid out in the NWFP Revision DEIS are an abandonment of the original intent.

Reading the DEIS I see several items that need addressing. These include a Purpose and Need that reflects a biased attempt to achieve a desired outcome, a lack of a full range of alternatives, abandonment of the original guidelines of the NWFP and [hellip]..

Purpose and Need:

The purpose and need of the DEIS is stated to be

[ldquo]to better enable the Forest Service to meet the original intent of the 1994 NWFP to conserve mature and old-growth ecosystems and habitat for the conservation of northern spotted owl and other Endangered Species Act (ESA) listed and non-listed species, protect riparian areas and waters, and provide a sustainable supply of timber and non-timber forest products.[rdquo]

The proposed action alternatives (B,C and D) allow the cutting of old trees up to 120 years of age, in direct violation of the original NWFP. Such actions will erase the 30 years of progress that have been made in growing a dynamic and healthy older forest for these dependent species as well as all the other good that has come from their protection (ie. Carbon sequestration, hydrologic improvement, reduction of forest floor temperature from shading).

Providing a sustainable supply of timber should not be a driving feature of the purpose of this DEIS and yet it appears that the change to allow cutting of the 80 to 120 year old trees, (now under the NWFP limited to less than 80 year old trees) was proposed expressly to provide timber for the timber industry. The unsustainable cutting of the 1920s to 1990s brought on the need to protect the small remaining uncut landscape and initiated the planning for the NWFP. This planning addressed the overcutting, worked to reestablish old stands, and to preserve and enhance the habitat of old growth dependent species. This loosening of the cutting regulations flies in the face of honest attempts to restore our forests. Timber volume will come with the thinning of young stands less than 80 years of age as there are many plantations that need careful thinning to grow into older stands of trees.

Lack of Full Range of Alternatives:

The DEIS does not address a full range of alternatives. None of alternatives investigate or propose expansion of

restrictions on harvesting of trees in the NWFP forests beyond that allowed in the current NWFP. The NWFP was to include the management of all or parts of 17 National Forests and the Western Oregon BLM O&C lands. The BLM has backed out from following the NWFP, leaving the success of the plan as is, in question. Removal of the BLM lands from the NWFP removes some 2.6 million acres that were a critical part of the plan and also provided connectivity between the coastal ranges and the Cascade Range populations of old growth-related species. To further erode the protections on the National Forest lands will further degrade these important habitats and endanger old-growth associated species with extinction.

In order to address the BLM lands no longer involved in the NWFP, the Forest Service should develop an alternative that expands protection of and development of older stands of trees beyond that which was identified in the NWFP. This is needed to ensure the success of the protection of these species and for other purposes (ie carbon sequestration, etc).

Abandonment of the Original Guidelines of the NWFP:

The guidelines laid out in Alternatives B, C and D abandon limit on cutting of trees over 80 years of age. This is a foolhardy maneuver to appease the timber industry. I see no other purpose in the DEIS that would necessitate the cutting of trees up to 120 years of age. The purpose of the NWFP was to slow down cutting on the National Forest and BLM to allow development of additional old age stands that could then be utilized by species that had been in a steep decline. Thickly stocked stands that were plantations less than 80 years of age were able to be thinned with the specific purpose of developing larger old stands. To now allow the cutting of trees up to 120 years of age will undo the good that has come from the reasonable work of the last 30 years.

In 2006 the authors and scientists involved in the development of the NWFP wrote a paper on the successes of the plan and changes that needed to be made. Below are some quotes from this paper [“The Northwest Forest Plan: Origins, Components, Implementation Experience, and Suggestions for Change, Jack Ward Thoman, Jerry F. Franklin, John Gordon and K. Norman Johnson In: Conservation Biology, Volume 20, No. 2, p 277-287, April, 2006.

Suggestions for the Future

1. Recognize that the NWFP has evolved into an integrative conservation strategy.
2. Conserve old-growth trees and forests wherever they are found.
3. Manage NWFP forests as dynamic ecosystems.

In making these recommendations we reaffirm the virtues of the NWFP. It precipitated the first large and serious attempt to manage whole forest landscapes in an integrated way so that all forest values are maintained and triggered an enormously useful and beneficial surge of forest science as a result of the effort to monitor the plan’s progress.

Conserve Old-Growth Trees and Forests

Reserve classic old-growth forests of the wetter habitat types. The classic old-growth forest (large, multistoried older forests of Moer et al. [2005]) of western Washington and Oregon, including portions of the Klamath Province, evolved with infrequent high-severity fire. They can survive for very long periods without human intervention except, perhaps, to suppress fires. The agencies should seek to conserve these forests wherever they occur.

Undertake the appropriate fuel treatments in the threatened old-growth forest of the drier habitat type. These habitat types include the ponderosa pine and dry mixed conifer plant associations.

Restoration treatments are needed and should focus on the removal of young trees and protection-not just retention-of all old trees.

The comments by Thomas, Franklin, Gordon and Johnson appear to be in stark contrast to the recommendations proposed by the NWFP Revision DEIS in either Alternatives B, C or D.

The Forest Fire Prevention Need to Harvest Big Trees:

The DEIS focuses on reducing fire and impacts from global warming to justify the cutting of larger trees. Cutting the trees to protect them does not make any reasonable sense. Wet forests along the coastal ranges of Washington, Oregon and Northern California benefit from having large trees that are more fire resilient than the smaller plantations of trees where excessive harvest has occurred in the past. Open stands of younger trees allow the forest floor to heat up and dry out increasing the fire potential and severity. Large trees with closed canopies can withstand ground fires and these fires will not flash through the forest floor due to its dampness. These wet forest old-growth areas are essential for the sequestration of carbon from the atmosphere and essential to the protection of the wider range of old-growth related species than in other areas covered by the NWFP.

Harvest of trees opens stands up in the Western Cascade Range as well. Although this area is dryer than the coastal range forests, their canopy closure cools the ground surface, retaining the moisture there to help restrict fire spread and intensity. A common refrain heard today is that the large fires of recent years is due to the lack of clearcutting on the National Forests. This is an obvious falsehood. A review of the results of the 2020 fires found that fires that burned very large swaths of forests in Western Oregon were more destructive on heavily managed private timber lands than on National Forest lands.

Overall, the report on the 2020 fires indicates that 260,700 acres of large privately owned timber land was within the fire perimeter of the twelve fires included in the study. Of these acres, 52% of the timberland was burned at a High Severity (>75% canopy mortality). On National Forest lands only 43% of the acres were burned at a High Severity condition. This is directly contrary to the notion that intensively managed (harvested) landscapes are less susceptible to high intensity fire damage.

Holiday Farm Fire: Of the 81,600 acres that were burned on Large Private Timber lands at Medium or High Fire Severity, 62,400 acres were considered [ldquo]Pre-merchantable[rdquo] which included recently harvested acres as well as plantations that were too young to harvest. This indicates that clear-cutting of lands does not halt or prevent destructive wildfire as some would contest. (Oregon Forest Research Institute-Labor Day Fires Economic Report, Sept. 2021, page 77). In the Holiday Farm Fire, 67% of the National Forest lands were burned with moderate to high intensity fires (25 to 100% mortality) whereas 75% of the private forest lands were burned to that severity.

Thinning stands in the Western Cascades and Coastal Ranges in Washington, Oregon and Northern California within the NWFP lands will open up the stands to further drying and endanger them to the fire damage that the thinning has been proposed to prevent. To thin a stand to the point that the canopy does not form a closure over the forest floor would create a stand that does not meet the definition of an old growth stand and would not provide the needed habitat to support the old-growth related species.

Due to a faulty purpose and need, the inadequacies in providing a full range of alternatives, inadequate justification for violation of current NWFP guidelines, and what appears to be an unjustified violation of the endangered species act to placate the timber industry, this DEIS should be reworked to address these concerns. The DEIS as presented will imperil several endangered species and will make the forests MORE susceptible to the wildfire and global warming threat that the DEIS claims to address.

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