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Comments: Please accept the attached comment from the Willamette Valley Broadband (chapter) of the Great Old Broads for Wilderness.

March 14, 2025

RE: Comments on Northwest Forest Plan Amendment DEIS

To: Regional Foresters Jacque Buchanan and Jennifer Eberlien

Please accept this comment on the draft EIS for the proposed Northwest Forest Plan amendment on behalf of the Willamette Valley chapter (aka Broadband) of the Great Old Broads for Wilderness. Great Old Broads for Wilderness is a women-led national grassroots organization that engages and inspires activism to preserve and protect wilderness and wild lands.

Our Broadband has also submitted comments as part of a letter on behalf of six Pacific Northwest chapters. We would like to offer this additional comment based on the experience and concerns of our membership, which ranges from roughly Albany to Eugene in the Willamette Valley and includes over 100 dues-paying members.

The Northwest Forest Plan continues to be instrumental in keeping the Pacific Northwest a special place through the restoration of forests and watersheds damaged by irresponsible past logging and road building, recovery of economically and ecologically valuable salmon runs, protection of wildlife habitat and old-growth forests, and ensuring our National Forests are part of a natural climate solution. We are concerned that the Forest Service's 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.

Our members have a rich relationship and experiences in the National Forests impacted by the Northwest Forest Plan.

In the Siuslaw National Forest, we have formally volunteered to maintain a section of the Corvallis to Sea trail, partnered with the Wetlands Conservancy to remove invasive species, and held a campout with activities that included a field tour and discussion with Forest Service staff. As part of this campout, we visited and discussed management of both plantation and older forest stands, and we saw marbled murrelets, threatened by habitat destruction in the Siuslaw. Groups of our members have gone on organized hikes on Marys Peak, at Cape Perpetua, and to Kentucky Falls.

This fall, on multiple days, several of our members visited sites on the Siuslaw National Forest specifically to document mature and old-growth forest stands in the age range that might be opened to more logging under the amended NWFP. In these stands, we observed a mix of Douglas-fir, hemlock, alder, and big-leaf maple trees in the canopy and a great diversity of native understory vegetation, signs of wildlife, edible mushrooms, and snags and down wood. These mature forest stands were healthy and showed little to no signs of past logging. They provided exactly the type of habitat needed by spotted owls, marbled murrelets, and other old-forest dependent species [ndash] or were developing into that habitat naturally.

Another national forest our members frequent is the Willamette National Forest. Here our engagement has included participation in volunteer stewardship activities, field monitoring of proposed timber projects, Wilderness monitoring, hiking, and education. To date, we have held two group campouts with educational and volunteer stewardship components in cooperation with Forest Service staff. We have done on-the-ground monitoring of proposed timber projects to document waterways, species diversity, and road conditions which informed our public comments. And in 2021 and 2023, we received grants from the National Wilderness Stewardship Alliance to perform monitoring of solitude and recreation sites in the Mount Washington, Diamond Peak, and Middle Santiam Wilderness Areas which increased the Forest Service[rsquo]s Wilderness Stewardship Performance scores. Our members performed over 900 hours of volunteer service as part of this project. Part of this wilderness monitoring also occurred on the Deschutes National Forest.

In late October, several of our members visited sites on the Willamette National Forest specifically to document mature forest stands in the age range that might be opened to more logging under the amended NWFP. In these LSR stands, aged 110 years old based on Forest Service data, we observed a mixture of Douglas-fir and hemlock, with understory components of huckleberry, hazelnut, vine maple, oregon grape, rhododendron, sword fern, salal, and vine maple. The average Douglas-fir trees were 30 inches in diameter. These naturally-developed stands did not appear to be in need of any kind of active management to continue to provide healthy and diverse habitat, carbon sequestration, water filtration, or recreational opportunities and ecosystem functions.

Based on our knowledge, experience, and deep connection to these national forests, we are asking the US Forest Service to choose components of the proposed DEIS alternatives that:

- * Keeps the age limitation for timber harvest in LSRs at 80 years.
- * Adopts age limitations for harvest of trees in matrix, but rather than tying that limitation to establishment date of 1825, use an age restriction of 80 years.
- * Keeps the primary purpose of LSRs for protecting and restoring habitat for species that depend on mature and old-growth forests.
- * Uses the strictest possible allowance for salvage logging, including in matrix. Post-fire forests provide needed

diversity and high-quality early seral habitat which is set back by logging.

- * Places more emphasis on the benefits of older forests for carbon sequestration and storage and for climate change mitigation.

- * Does not mandate treatment or harvest acres or volume.

- * Reduces emphasis on aggressive logging techniques such as regeneration harvest and variable retention harvest.

- * Adopts recommendations around tribal sovereignty, inclusion, and co-management/co-stewardship.

In short, we do not support the commercial harvest of any mature or old-growth trees or forests. We believe the goal of the Forest Plan should be to expand the abundance and distribution of mature and old-growth forests like those we have spent time observing, enjoying, and advocating for for many years. Amendments to the Northwest Forest Plan that follow these guidelines will support our efforts to steward, enjoy, and explore our local National Forests, and allow us to work more collaboratively with local agency staff rather than focus on projects we feel have negative impacts to forest and watershed health.

We appreciate the opportunity to provide comments on the DEIS and hope they inform a final amendment that addresses our concerns.

Sincerely,

[], Brownsville, OR [], Eugene, OR

Co-leaders of the Willamette Valley Broadband On behalf of our leadership team and members

[2 photographs of people in front of trees - SEE PDF]

ATTACHMENT-LETTER TEXT: WV Broadband NWFP DEIS comments 3.14.25.pdf; this is the same content that is coded in text box; it was originally included as an attachment