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Comments: To whom it may concern,

I wish you well and am excited to submit a comment on the Northwest Forest Plan Draft Environmental Impact Statement. My name is Jay Tavaréz-Brown and I am a project specialist working for Snohomish County's Office of Energy and Sustainability in the state of Washington. I have a Bachelor of Science degree in forestry from the University of the South. In my work with Snohomish County, I train and lead groups of volunteers to implement riparian habitat restoration projects through the county's Healthy Forest Program. My supervisor in the Office of Energy and Sustainability encouraged me to submit a comment on behalf of the county. In preparation to submit my comment, I attended a public meeting about the draft EIS in January and I read Appendix A Volume 2 of the document. I prefer Alternative D with Alternative B as a second. I do not find Alternative C acceptable. In the following pages, I will discuss my reasoning and reference the plan. References will be made using abbreviations of policies which are also found in the policy table in Appendix A Volume 2.

I prefer Alternative D mainly because of the inclusion of tribal groups and the recommended use of fire as a management tool. Tribal consultation on 10 projects annually and integration of indigenous knowledge into NW Forest operations will benefit tribal groups as well as other residents of the Pacific Northwest (TRIBAL-FORSTW-ALL-OBJ-03-D). Since time immemorial, tribes have used prescribed burns as a tool to maintain open land for hunting, to reduce fuels, and to cultivate important foods like huckleberry and camas. Restoring fire to the landscape as a management tool will allow tribes to continue cultural practices and will protect other northwest residents from fire (TRIBAL-FORSTW-ALL-GOAL-08-D; TRIBAL-FORSTW-ALL-GOAL-09-D; TRIBAL-FORSTW-ALL-PMA-D). This alternative also provides for more reforestation treatments after fire than the other alternatives (FIRE-ALL-OBJ-03-D). One aspect that I disagree with is the push to treat community buffers while exempting them from pre-disturbance surveys (FIRE-ALL-GDL-06-D). While I understand the urgency to treat community buffers for fire safety, I would prefer that these areas are submitted to survey before treatment. Overall, I think that Alternative D of the NWFP is the most inclusive for tribes and the most fire wise alternative.

I also prefer Alternative D because it plans for the northern spotted owl to return to its historic range, requires Forest Supervisor review before the NEPA process, and provides for new recreation facilities and updates to older facilities. While it is unknown how the northern spotted owl will respond to treatments recommended by the plan, I think it is wise to plan for a population resurgence of northern spotted owl (FORSTW-MLSA-DRY-DC-03-D). I also appreciate the policy which requires the Forest Supervisor to review treatments before the NEPA process (FORSTW-LSR-PMA-D). I think this will create greater alignment with local values, regardless of the NEPA process which will likely be affected (at least in the short-term) by upheaval of environmental protections at the federal level. Last, I am grateful for the inclusion of provisions to update and create new recreation facilities (CLIMATE-GDL-03-D). Snohomish County and other western counties of Washington are growing very quickly, and the pandemic encouraged many residents to pick up outdoor hobbies. New and updated facilities will accommodate our growing population of outdoor hobbyists and hopefully minimize conflict between recreators and other user groups, especially tribes.

Alternative B has many of the same positive aspects as Alternative D and is also acceptable. I liked that this Alternative allows salvage harvests in moist Late Successional Reserves for tribal stewardship, cultural use, public safety, etc (FORSTW-LSR-MOI-STD-02). Additionally, while I like the ambition present in Alternative D, I think that the acreage goals for treatments are generally more realistically achievable than those in Alternative D. While B is an acceptable Alternative, I would recommend writing resilience goals for managed LSAs for this alternative as well.

I do not find Alternative C acceptable because the definition of old growth does not reflect scientific consensus. In a region where our largest trees are capable of living over 1,000 years, 80 years old is not an old growth forest (FORSTW-LSR-MOI-STD-01-C). A forest of this age has barely had enough time to recruit a second age class to the canopy. 80-year-old forest stands are relatively young and these stands should be capable of weathering timber harvest or other treatments. 200-year-old stands, while more complex than younger stands, are also not

that old. Retaining trees in these older stands should be a goal for the USFS, however management of these stands must be a goal. As mentioned, humans have managed forests in the Northwest region since time immemorial. The exclusion of fire and other management techniques has significantly altered our forests' resilience to disturbance. Counterintuitively, in order to preserve these forests, we must manage them. To retain older trees in these areas, selective thinning and variable density thinning should be encouraged in combination with the use of fire where appropriate. While I find Alternative C unacceptable, I will highlight its positive commitment to reduce wildfire risk to northern spotted owl habitat and to existing recreational facilities (FORSTW-MLSA-DRY-GDL-01-C; FORSTW-MLSA-DRY-GDL-02-C; ECONSUST-PMA-C). While these commitments are positive, to achieve these commitments, timber harvest and other management techniques will be necessary.

Thank you for considering my comment. In summary, I prefer Alternative D with Alternative B as a second because of the proposed collaboration with tribes and commitments to fire preparedness. I do not endorse Alternative C because its basis is unscientific. If you would like to further discuss my comment with me, please email me at isabellajay.tavarez-brown@co.snohomish.wa.us or call +1 (425) 626-0770.

Best,

Jay Tavarez-Brown