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First name: Bill

Last name: Arthur

Organization:

Title:

Comments: Dear Regional Foresters,

Here are my comments regarding the DEIS to update the Northwest Forest Plan (NWFP). I appreciate the effort to update and build upon the strong foundation of protection for our old growth forest ecosystem, spotted owl and other endangered species. The NWFP has served us well over the past thirty years. The framework of Late-Successional Reserves (LSR's), Aquatic Conservation Strategy (ACS), provide a solid foundation on which to further protect this important ecosystem and the over 200 species that rely on it for all or part of their life cycle. This important framework and level of protection must not be weakened.

I was involved with the development of the original NWFP serving on Sierra Club Northwest Office staff during that period. I was a panelist at the Forest Conference hosted by President Bill Clinton in the spring of 1993. The NWFP is the first ever landscape level, ecosystem-based management strategy and its creation was largely driven by the listing of the spotted owl as an endangered species and minimum viable population standard from the regulations implementing the National Forest Management Act. The spotted owl was selected as and "indicator species" for the health of the old growth forests. In the previous decades we had badly overcut these forests and severely damaged the habitat, watersheds, and fabric of our old growth forest ecosystem. We cut like there was no tomorrow but tomorrow caught up with us as we logged the Northwest's old growth forests down the last 10% of what was once a vast forest system. The courts halted the destructive level of logging and public demand for protection led to the development of this first ever comprehensive forest management plan.

The viability of the spotted owl remains in doubt. The need to protect its critical habitat is more important than ever. The extensive fragmentation of the habitat coupled with the invasion of the barred owl makes expanding protection critically important as the NWFP is updated. The critical habitat recommendations of the U. S. Fish and Wildlife Service should be included in the plan update including lower quality habitat. Spotted Owls numbers have continued to decline. And the USFWS recommendation to reduce the number of barred owls may be well be terminated by the Trump administration. This makes including all critical habitat, including lower quality, habitat an essential action for the NWFP update. Climate change and impacts to habitat just make this more important.

Related to the need to protect more critical habitat for the spotted owl, marbled murrelet and other species is the need to retain protection for all stands of mature forest 80 year and older. This element was put in place in order to recruit more old growth forest over time given the enormous loss and fragmentation of the original old growth forests. The need to protect mature forests for recruitment has only increased with climate change and anticipated loss of old growth forest. I oppose any efforts to modify and raise the age threshold for forests in LSR's. We should expand the protection of remaining old growth forests through the matrix lands and retain the current integrity of the LSR's.

We should also be looking to increase the standards for the Aquatic Conservation Strategy. Since the NWFP was put in place multiple runs of salmon and steelhead have been listed under the ESA from Canada through Northern California. For example: California Coastal Chinook was listed in 1999 as was Upper Willamette River Chinook, and multiple runs of chinook salmon from Puget Sound Rivers. Chinook salmon are a critical food source for the endangered Southern Resident Killer Whales which feed on salmon from Puget Sound down the coast to Monterrey California. Recovering chinook salmon is a critical action for themselves and for the orca and the many tribes whose culture and lifeways depend on them. Oregon Coast coho salmon were listed in 1998. Many other runs have been listed as well. Recovering these threatened and endangered salmon runs is necessary to meet our treaty responsibilities with Tribal Nations. The draft EIS does not include analysis or recommendations as to what is needed to improve protection and recovery for salmon and steelhead. Climate change also makes this an important action to consider. Warming temperatures are increasing water temperature making the need for cold water refugia and assuring healthy watersheds critically important. We should be looking at increasing no logging buffer zones in the ACS.

Drinking water for many communities is also protected by the NWFP and ACS. Many communities benefit from the recreational use of these forests and watersheds. Hiking, hunting, fishing, wildlife viewing, all generate substantial, and sustainable, economic benefits to these communities.

The old growth forests are one of our most important carbon sinks. The value and importance of this was not a major factor in the development of the original NWFP. This is now one of the most important benefits of protecting these unique forests and argue for expanding that protection. The need to address increased risk of wildfire is a legitimate and there is increased risk of fire from climate change. So, some vegetation management for wildfire risk reduction is likely necessary. But this should not be used as an excuse for expanded logging or reducing the level of protection for mature and old growth forests or the LSR's. We must use best practice science for creating fire prepared communities along with ecosystem integrity and resilience.

I support the recommendations in the draft EIS that incorporate stronger role for Tribal Nations in managing these forests and utilizing native knowledge and practices.

In summary the NWFP is a critically important management plan and has overall served us well. The proposed alternatives weaken protection for mature forests, put critical habitat at further risk and won't adequately protect the spotted owl or other old growth dependent species. The failure to expand protection of the ACS continues to jeopardize salmon and steelhead runs and undermine major investments to recover these species being made by the federal government, states, and tribes. The options proposed increased logging rather than increased protection of these forests. They undermine both the ecological and legal integrity of the plan. The NWFP was put in place to address the decades of excessive logging that resulted in the near demise of this critical ecosystem. While progress has been made, we have a long way to go and must not risk be weakening current protections.

Bill Arthur