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Title:

Comments: Sunday, March 16, 2025

Subject: Protect our forests and communities by strengthening the Northwest Forest Plan -- Northwest Forest Plan Amendment #64745

To Forest Service Chief Tom Schultz:

I strongly urge you to strengthen and expand the protections afforded by the Northwest Forest Plan to safeguard our drinking water, wildlife, and mature and old-growth forests. The proposed changes would weaken core environmental protections for our forests and create loopholes to allow logging in places meant to protect wildlife. The Northwest Forest Plan has conserved millions of acres of our national forests, and any amendment must recognize the critical role these public lands play in providing clean water, mitigating climate change, and protecting biodiversity.

The Northwest Forest Plan was enacted to halt and reverse the devastation caused by past logging and road building practices, which were driving the extinction of old growth-dependent wildlife, polluting our water, and destroying ecosystem function. The Northwest Forest Plan centered ecosystem health as a primary goal. It remains unique in its vision, and uniquely successful as a model for forest management. In the decades since unchecked logging across national forests in the northwest, the Northwest Forest Plan has largely been successful, has preserved remaining old-growth forests, and has kept towering Douglas firs, western red cedars, western hemlock, and Sitka spruce standing tall. It has, thereby, preserved: critical habitat for endangered old-growth dependent species such as the spotted owl and marbled murrelet; cold and clean streams for species including salmon and bull trout, as well as for downstream communities' drinking water supplies; and an irreplaceable store of carbon. But, considering the climate and extinction crises and its failure to incorporate Tribes, it must be strengthened and expanded to meet the Forest Service's obligations to Tribes and to protect our last remaining mature and old-growth forests and the benefits they provide to all of us.

The central pillars of the Northwest Forest Plan were put in place to ensure this ecosystem can be sustained. Those pillars include land use allocations such as the Late Successional Reserves which have helped ensure distribution and abundance of old-growth forests in perpetuity, and measures like the Aquatic Conservation Strategy to protect river corridors from degradation. Any amendment that undermines the foundation of the Northwest Forest Plan should strongly be rejected.

Unfortunately, the Forest Service's Proposed Action (Alternative B of the Draft Environmental Impact Statement) would remove important protections for species and ecosystems that the Plan was developed to protect, harming our region's wildlife, watersheds, and resilience to climate change.

*I reject the Proposed Action because it fails to protect the Pacific Northwest's biodiversity and ecosystems. The Proposed Action would substantially weaken the Plan's ecosystem and wildlife protections by opening to logging over 800,000 acres of previously protected older forest stands and creating new loopholes to allow the logging of older trees that do remain protected. This significant increase in logging ignores the Forest Service's duty to protect species listed under the Endangered Species Act, and would drive northern spotted owls, marbled murrelets, salmonids, and other old-growth dependent species toward extinction. Instead of increasing logging, the Forest Service must protect all remaining mature and old-growth moist forests in the Plan area to preserve ecosystems, save more carbon-storing trees, and improve fire resilience.

*I oppose the Forest Service's exploitation of wildfire fear that would allow for logging that could reduce the landscape's resilience to wildfire. The logging that could occur pursuant to the Proposed Action and Alternative D under the guise of "fuels reduction" largely represents a handout to the logging industry and could make wildfires worse by removing older, fire resilient trees. It would also cause harm to biodiversity and watersheds. While dry, fire-prone forests may at times benefit from interventions, those interventions are already permitted under the Northwest Forest Plan. The Forest Service should instead focus its limited resources on logging small, young trees in commercial plantations nearest to communities, prescribed burning, and on promoting community resilience through home hardening.

*The Forest Service should modify and select Alternative C to better protect ecosystems, increase carbon storage, and meaningfully incorporate Tribes into forest management. While Alternative C is more protective of ecosystem function than the Proposed Action, it fails to incorporate the tribal involvement provisions contained in the Proposed Action and should be modified to include the same robust commitments to Tribal stewardship contained in the other action alternatives. Alternative C should also be modified to prohibit post-fire salvage logging, which harms an ecosystem's regeneration processes, pollutes our water, removes important habitat features, and reduces carbon storage. Salvage logging should be prohibited in all late-successional reserves except in the rare circumstance where it is warranted, such as for the removal of roadside hazards.

There are valid reasons to update the Northwest Forest Plan. We must include indigenous communities in the creation and implementation of a plan. We do need to ensure appropriate management in an era of wildfire, and that must be directed by the restoration of ecosystem health, not by timber profits. It is beyond time we recognize the enormous climatic benefits we get from oldest forests. And we can fix what is broken without undermining what works.

The pressures from climate-driven threats, along with increased scientific understanding and information gleaned from the Northwest Forest Plan's monitoring protocols, highlight the need for targeted updates to the plan to maintain healthy, resilient forests. In modernizing the Northwest Forest Plan, it is crucial that we ensure that beneficial ecosystem services continue to flow from our national forests and that they are able to adapt to a changing climate. An amended Northwest Forest Plan must:

*Protect and conserve all remaining mature and old-growth trees and forests in both moist and seasonally dry forests to preserve ecosystems, save more carbon-storing trees, and improve fire resilience. While the Northwest Forest Plan reserved many older forests in 1994, it did not protect them all, which has led to controversy among stakeholders. Thus, the Northwest Forest Plan amendment must sustain and replenish older trees and forests into the future.

*Ensure consistency with President Biden's 2022-23 Executive Orders on forest protection and climate resilience, including the 30x30 initiative, which recognize the critical role our National Forests play in halting the climate and biodiversity crises.

*Preserve biodiversity and improve connectivity of wildlife habitat. This includes not only threatened and endangered species, but all species that have been impacted by the loss and fragmentation of their habitat. Conservation of the northern spotted owl, marbled murrelet, and native salmonids was a cornerstone of the 1994 Northwest Forest Plan, and an amendment should only maintain and enhance protections for at-risk fish and wildlife. The Northwest Forest Plan amendment should bolster efforts to recover wildlife, recognizing the ongoing threat of climate change and past management practices. To protect biodiversity in the era of climate change, the amendment must ensure habitat resilience from disturbances such as wildfire, drought, disease, and insects.

*Protect and expand the reserve network of the Northwest Forest Plan. The Plan has been a success because it moved many older forests into "reserves" that limited commercial logging. It is imperative that these reserves continue to be protected from attacks by the timber industry.

*Protect complex early-seral forests from logging. We worsen the condition of present and future fire-affected forests by "salvage logging" after fires, which destroys the soil and important wildlife habitat, pollutes our water, and erodes natural forest regeneration processes.

*Recognize and address the effects of climate change, particularly the increase in very large and severe wildfires. While the Northwest Forest Plan considers the essential role that wildfire plays in our forests, the size and severity of wildfires has far exceeded expectations. The U.S. Forest Service should reassess current management strategies in light of escalating wildfire threats and consider incorporating Indigenous cultural burning practices.

*Increase and improved Tribal involvement in forest management of their ancestral lands and increase use of Traditional Ecological Knowledge. Consultation with local Tribal Nations and incorporation of Indigenous Knowledge will be critical steps for the Forest Service to take in amending the Northwest Forest Plan.

*Recognize shifts in the region's socioeconomic landscape since 1994 and de-emphasize timber production. While forest management will continue to be a part of the Pacific Northwest economy, recreation and other pursuits now draw more people to the region than ever before. The amended plan must set new timber targets that recognize communities' decreased reliance on forest exploitation and more appropriately limit the amount of commercial logging that occurs on public lands. Building a modern forest restoration workforce will contribute to ecological resilience of our National Forests and ensure continued public enjoyment of these lands we all value. Mature and old-growth trees are worth more standing than logged.

*Expand and strengthen the Aquatic Conservation Strategy. The ACS has been one of the most successful components of the Northwest Forest Plan, but as climate change and the freshwater extinction crises worsen, expanded riparian buffers and additional key watershed designations are necessary to protect salmon runs and water quality.

*Bring back our beavers. Beavers are critical to watershed health and are missing from much of their historic range. The Northwest Forest Plan amendments offer an exciting opportunity to help restore beaver populations and the benefits they provide.

The Northwest Forest Plan is critical to the health of our ecosystems and human communities, and any amendments must maintain and strengthen its ecosystem-based conservation goals while meaningfully incorporating Tribes' perspectives and respecting their sovereignty. The extinction and climate crises we face demand nothing less. I urge the Forest Service to use a transparent, science-based approach that reflects public values, Tribal perspectives, and the interests of future generations.

The highest values of our oldest forests can only come from keeping them standing. The Northwest Forest Plan recognized this in 1994. We cannot go back now.

Thank you for your consideration of my comments. Please do NOT add my name to your mailing list. I will learn about future developments on this issue from other sources.

Sincerely,
Christopher Lish
San Rafael, CA