

Data Submitted (UTC 11): 3/17/2025 10:33:13 PM

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Comments:

March 17, 2025

Regional Forester Jacqueline Buchanan
Pacific Northwest Region
U.S. Forest Service
1220 SW 3rd Avenue
Portland, OR 97204

Regional Forester Jennifer Eberlien
Pacific Southwest Region
U.S. Forest Service
1323 Club Drive
Vallejo, CA 94592

Submitted online via <https://cara.fs2c.usda.gov/Public/CommentInput?Project=64745>

****Re: Northwest Forest Plan Amendment Draft Environmental Impact Statement****

Dear Regional Foresters Buchanan and Eberlien:

I am writing to express my deep concern regarding the Northwest Forest Plan Amendment (NWFP) Draft Environmental Impact Statement (Draft EIS). As someone who values our ancient forests, clean watersheds, and vibrant ecosystems, I believe we must maintain and strengthen protections for these invaluable public lands.

For the past three decades, the Northwest Forest Plan has served as a vital blueprint for managing our 17 national forests across western Washington, Oregon, and northwestern California. This plan significantly reduced destructive logging practices while protecting crucial habitat for iconic Northwest species like salmon, northern spotted owls, and marbled murrelets. It has balanced ecological preservation with sustainable timber production.

However, I'm troubled by recent developments that threaten to undo this progress, particularly the March 1st executive order calling for "immediate expansion of American timber production" and instructing agencies to bypass established environmental protections. This short-sighted approach would prioritize timber extraction over all other forest values and uses—a position I strongly oppose.

As we confront the triple challenges of climate change, biodiversity loss, and increasingly severe wildfires, I urge you to adopt a plan that centers ecological integrity and social justice. Specifically, I request that the final plan:

1. ****Honor Tribal Sovereignty****: Integrate Indigenous Knowledge and stewardship practices by collaborating with Tribes to identify and manage for desired ecological conditions and culturally significant species. The original NWFP failed to incorporate this vital perspective, and we must rectify this oversight.

2. ****Protect Mature and Old-Growth Forests****: Strengthen, not weaken, protections for these irreplaceable ecosystems. These forests provide critical wildlife habitat, store carbon, build climate resilience, and safeguard water quality. The proposed redefinition of these forests in the Draft EIS leaves too many vulnerable to logging

and development.

3. ****Maintain the Purpose of Late-Successional Reserves****: Reject the proposed expansion of LSR management to include "restoration" of young forest habitat, which effectively enables regeneration harvest in these critical areas. This directly contradicts the purpose of these reserves and undermines their ecological function.
4. ****Preserve Wildlife Protections****: Ensure that changes don't undermine habitat for endangered and threatened species, including the northern spotted owl, marbled murrelet, and numerous aquatic species. The Draft EIS proposes radical alterations that could jeopardize these species' recovery.
5. ****Implement Ecological Fire Management****: Focus fire resilience efforts on community preparedness and home hardening rather than mature tree removal. Any forest treatments must retain larger-diameter trees, be paired with prescribed burning, and avoid negative impacts to wildlife and carbon storage.
6. ****Reduce, Not Expand, the Road Network****: Address the impacts of road construction on watersheds, water quality, and wildlife habitat. The Forest Service should prioritize reducing the overall road network rather than expanding it to facilitate aggressive timber targets.
7. ****Maintain Survey and Manage Programs****: Continue documentation and protection of unique and uncommon species and their habitats through the Survey and Manage program.
8. ****Support Environmental Justice****: Analyze impacts on air, water, and communities to ensure equitable outcomes and sustainable working conditions.
9. ****Preserve Recreation Access****: Consider the economic and social value of outdoor recreation, which is compromised by increased logging activities and associated area closures.
10. ****Ensure Adequate Resources****: Provide sufficient staffing and funding to properly implement any proposed management actions, particularly those related to fire risk reduction.

I understand there are positive elements in the proposed amendments, including steps toward Tribal inclusion and beneficial fire use. However, the shortcomings that place mature and old-growth forests at risk must be addressed in the Final EIS.

The Northwest's public forests are irreplaceable treasures that deserve thoughtful, science-based management for generations to come. I urge you to strengthen the Northwest Forest Plan's conservation framework rather than weaken it.

Thank you for considering my comments.

Sincerely,

Adina Eggen
Rhododendron, OR