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Comments: My name is Noreen Parks. I worked for more than thirty years as a professional science writer, living in California, Hawaii, and Washington. As a freelance and contract writer for a broad number of science journals and other publications, forestry and ecology were key subjects in my work. From 2009-2016 I wrote "Science Findings" issues for the Pacific Northwest and Pacific Southwest research stations. I also worked for the Stanislaus National Forest in the late 1970s. In addition, for decades I have explored and recreated in forests in the Western US, Canada, Asia and South America.

I am deeply concerned about the proposed restructuring of the Northwest Forest Plan. For more than three decades, the NWFP has followed the dictates of the USFS's multiple-use policy in protecting mature and old-growth forests, and conserving their diverse wildlife on federal lands throughout the Pacific Northwest. Now the Forest Service is proposing a drastic amendment to the plan which brushes aside those priorities by accelerating logging, thereby putting our forests, fish, wildlife, clean water, and climate at risk.

Amped-up Logging is NOT Wise Forest Management

According to the DEIS, the Forest Service logged approximately 504 million board-feet of timber from the 17 National Forests within the NWFP area in 2023. Under Alternatives B and D, the Forest Service aims to double that amount, to more than one billion board-feet annually.

The DEIS makes the patently preposterous claim that grossly increased logging under the proposed amendment would not substantially lessen protections for forest-associated species throughout the planning area. On the contrary, basic ecology and community biology tell us that excessive fragmentation and loss of habitat negatively impacts species diversity and numbers. Yet, conveniently the DEIS fails to include measures to ensure the recovery of species listed under the federal Environmental Species Act or the viability of other native species!

Other changes in the preferred alternative, B, would wreak havoc on wise forest management by redefining essential terminology. For example, forest stands up to 120 years old would now be considered "young," in stark contrast to the previous NWFP definition of "mature" stands as 80 years old. This redesignation would allow logging in moist "young" stands up to 120 years old in late-successional reserves, thereby supporting the opening up of more than eight-tenths of a million acres to timber extraction, with all the attendant adverse impacts from associated road-building and heavy-machinery use. This shift would mean these mature stands would not be allowed to age and fulfill their potential as old-growth forest, thereby continuing the headlong demise of this ecologically distinct and invaluable forest type across the region.

Wise Forest Management Recognizes Complexity

The broad-brush oversimplification of forest stand categories flies in the face of abundant research showing that forests in different geographic settings and climatic conditions manifest their age differently. For example, old-growth Douglas-fir trees in the range of the Olympic rain-shadow-where I reside--which receive annually receive 18 inches or less precipitation, may measure only 30 inches in diameter, but reveal an age of up to 180 years when cored.

Another case in point are the 77,000 acres of "legacy" forests managed by Washington state. These structurally complex, mature, diverse forests are among the very best in the world at carbon storage and sequestration. As natural forests, they are highly resistant to wildfire and critical for biodiversity, water quality, and salmon habitat. Often logged prior to 1945, many of these conifer forests are close to a hundred years old. Technically outside

the reach of the USFS, they would fall into the preferred alternative's "young" category, and may not look their age.

Under a revised NWFP, will USFS and timber sale personnel be measuring and coring trees to gauge their actual ages? Given the haste and imprecision frequently involved in the management of logging, one thinks not.

Using Wildfire Prevention as a Red Herring

Finally, managing forests to prevent and wildfires is unquestionably a critical priority. However, just as suppressing all wildfires (a la Smokey Bear) was a tragic historical error of biblical proportions, likewise logging entire forests under the guise of fire prevention would be disastrous.

It could be argued that no one knows more about wildfires than the USFS. Through its voluminous scientific research on causes, prevention, forecasting, and every other conceivable angle, the service is making progress in achieving resilient landscapes, fire-adapted communities, and safe and effective wildfire responses. With strong, reliable funding, a stable workforce, and support from the federal executive branch, I firmly believe the USFS can do an ever-improving job. Unfortunately, this support has been grievously withdrawn. It saddens me that so many loyal, hard-working personnel have received such poor treatment.

On the other hand, it's a welcome sign that the DEIS highlights partnering and consulting with the Western tribes, who have so much traditional knowledge to share on using fire and other time-honored land management techniques.

In conclusion, our forests are natural, national assets. They don't belong to the timber or wood products industries. They don't belong to the USFS or the Trump administration. They don't even belong to the current generation. They are planetary assets, to be wisely managed for perpetuity-for wildlife, future generations of humans, and their own integrity. We need a strong Northwest Forest Plan to protect our remaining mature and old-growth forests and the many species that depend on them for survival. We also need it to protect our collective interest in clean air, drinkable water, and the climate stabilizing benefits forests provide by storing and sequestering vast amounts of carbon.

Therefore, I strongly urge the adoption of Alternative A, with the addition of the proposed collaboration with Tribal entities. Thank you for the opportunity to comment, and your efforts in forging a complete final document.