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Comments: Public Comment on Proposed Amendments to the Northwest Forest Plan

I am writing to express my strong opposition to the proposed amendments to the Northwest Forest Plan (NWFP), which significantly weaken protections for old-growth and mature forests, increase logging allowances, and fail to uphold the plan's core purpose of conserving biodiversity and critical habitat. These changes threaten the long-term health of Pacific Northwest forests, undermine climate resilience, and put at risk the ecological integrity of some of the most carbon-rich and biodiverse landscapes in the United States.

Late-Successional Reserves

One of the most concerning changes is the redefinition of "young" forest stands, allowing logging in forests up to 120 years old, a major departure from the previous 80-year threshold. This shift would open 824,000 acres of Late-Successional Reserves (LSRs) to logging, undermining their original purpose of fostering old-growth conditions and supporting threatened species. The introduction of vague new justifications for logging in LSRs, such as "restoring habitat for other species" or "achieving other desired conditions," further weakens protections and could lead to widespread degradation of these critical forests. Additionally, allowing salvage logging along roads in moist LSRs risks converting recovering burned areas into industrial plantations rather than allowing natural regeneration to occur.

Matrix Lands

In Matrix lands, where logging is already concentrated, the proposed changes would remove meaningful protections for older forests. Logging would be permitted in stands up to 200 years old under broad exemptions, including the justification of "fire risk reduction," despite scientific evidence that logging often increases fire hazards in wet forests by drying out the landscape and creating fuel-laden conditions. The Forest Service also plans to log 81,000 acres per decade in moist Matrix forests purely to bolster timber production, prioritizing extraction over ecosystem health. All forests over 80 years old that were previously designated as Matrix lands should be reclassified as old-growth reserves, ensuring they receive the conservation safeguards necessary to support old-growth affiliated species, carbon storage, and ecosystem resilience.

Perhaps most alarming is the failure of this amendment process to uphold the original biodiversity conservation purpose of the NWFP. Despite rolling back habitat protections and expanding logging allowances, the DEIS asserts that these changes will not substantially impact species protections, yet it fails to include species-specific recovery measures to ensure the viability of ESA-listed and other native species. This is a direct contradiction to the intent of the NWFP and ignores the best available science on species conservation.

I urge the Forest Service to reject these amendments and instead prioritize science-based conservation strategies that maintain the NWFP's foundational goals of protecting old-growth forests, supporting biodiversity, and preserving the region's critical role in carbon sequestration. The NWFP was designed to ensure long-term ecological integrity, and any updates should strengthen, not weaken, its protections in the face of climate change and biodiversity loss. Logging at the scale proposed in these amendments is incompatible with these goals, and I strongly oppose any efforts to undermine the NWFP's original conservation commitments.

Managing these forests for carbon sequestration and storage

The Draft Environmental Impact Statement (DEIS) fails to fully recognize the immense future carbon storage potential of the moist, wet, and rainforest zones within the NWFP region. These forests are among the most productive carbon sinks on Earth, capable of sequestering vast amounts of atmospheric carbon as they grow and mature. However, without a clear acknowledgment of their future carbon storage potential, the DEIS risks

undervaluing the critical role these forests must play in meeting climate goals.

The old-growth rainforests of Western North America, particularly those within the NWFP, are unparalleled in their ability to store and sequester carbon over long timescales. These forests accumulate biomass at extraordinary rates. Additionally, the dense understory, rich soils, and abundant organic material found in these ecosystems further contribute to their carbon storage and sequestration capacity. Protecting and managing these forests for carbon storage is not just an environmental priority, it is a necessity for meeting both national and global climate targets.

Out of 154 National Forests, the NWFP currently manages nine of the ten highest carbon-storing forests in the United States, highlighting its critical role in mitigating climate change. Beyond their function as carbon sinks, these forests support exceptional biodiversity, providing habitat for countless species, including threatened and endangered wildlife such as the northern spotted owl, marbled murrelet, and Pacific salmon. The ecological integrity of these forests is closely tied to their ability to sequester carbon, meaning that conservation strategies focused on protecting biodiversity also enhance their role in stabilizing the climate.

Ensuring these landscapes remain intact and are managed with climate change in mind is not just a regional concern; it is a global imperative. The carbon stored in these forests represents one of the most effective natural solutions to mitigating rising atmospheric carbon levels, making their protection a necessary component of national and international climate strategies. Investing in their protection and responsible stewardship will not only safeguard biodiversity but also provide long-term climate benefits that extend far beyond the Pacific Northwest.

The Risks of Forest Thinning and Logging in Wet Forests: Increased Fire Hazard to ecosystems and Local Communities

Forest thinning and logging in the wet forests of the Pacific Northwest are often promoted as wildfire prevention strategies, but in reality, these practices can make these ecosystems more vulnerable to fire and pose greater risks to nearby communities. The moist and temperate rainforests of this region, including the old-growth and mature forests covered by the NWF, have historically been characterized by infrequent, low-intensity fires due to their naturally high moisture levels. However, thinning and logging disrupt these ecosystems in ways that reduce their natural fire resistance and increase the likelihood of more severe wildfires.

Increased Flammability and Fire Spread?

Logging and thinning operations remove large, fire-resistant trees and replace them with younger, smaller vegetation that is far more flammable. Old-growth and mature trees in wet forests have thick bark, high canopies, and retain moisture, making them naturally resilient to fire. When these trees are removed, they are often replaced by dense, fast-growing vegetation and logging slash (branches, needles, and debris left behind after cutting), which dries out quickly and creates highly combustible fuel loads on the forest floor. This fuel buildup can increase fire intensity and spread, transforming historically fire-resistant forests into more fire-prone landscapes.

Changes to Microclimate and Drying Effects

Thinning and logging also alter the microclimate of wet forests by opening up the canopy, which reduces shade and exposes the forest floor to direct sunlight. This leads to drier conditions as moisture evaporates more quickly from soils and vegetation, further increasing the risk of fire. In contrast, intact wet forests maintain a cool, humid environment that naturally suppresses fire ignition and spread. Removing large portions of the canopy through logging disrupts this natural fire-dampening effect and accelerates drying, making fires more likely to start and spread rapidly.

Greater Risks to Local Communities

As logging and thinning operations increase fire hazards in these wet forests, they also create significant safety risks for nearby communities. Increased fire frequency and severity can threaten homes, infrastructure, and air

quality, putting local residents at greater risk of property loss and health impacts from wildfire smoke. Moreover, logging roads and human activity in previously intact forests can introduce more ignition sources, further compounding the risk.

Using thinning and logging as a fire prevention strategy in the wet forests of the Pacific Northwest is not only ineffective but also dangerous and unsupported by scientific evidence. While thinning may have some fire management benefits in dry forest ecosystems with frequent natural fire cycles, applying the same approach to wet forests ignores the fundamental differences in their ecology. Promoting logging under the guise of fire prevention in these fire-resistant landscapes ultimately undermines their natural ability to regulate fire and puts communities at greater risk. A science-based approach to fire safety should focus on protecting homes, restoring natural fire regimes where appropriate, and maintaining the integrity of wet forests as climate-resilient landscapes, rather than resorting to industrial logging practices that increase both fire hazard and carbon emissions.

- I endorse the Coast Range Association's (CRA) comments on the DEIS. Please fully consider the CRA's comments.

- I incorporate by reference all tribal related recommendations contained in the Federal Advisory Committee's Report