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Comments: The NWFP is a critically important piece of our lands management which has been guiding and protecting for over 30 years. We are disturbed that the four options given in the USFS DEIS are seriously lacking in intent, protections, and actions of the original plan. With the exception of the inclusion of tribal influence and participation, the options are unacceptable. The USFS needs to acknowledge that ever greater protections are needed in this time, and to not fail to act with boldness in creating a plan which follows real science, true understaning of how much we've lost, how much we need to protect, and that this CANNOT BE ABOUT MONEY. At this point, it just cannot.

There is no legitimate scientific reason for the Forest Service to abandon its obligation as the nation's steward of remaining late-seral forests that are linked to the viability of dependent species. IN FACT, we now can see we live in times of GREAT PERIL to our forests and natural landscapes & amp; habitat, with executive, legislative and judicial branches suddenly at the ready to derail a century of protections in our national forests, national parks, conservation areas, refuges, waters, and everywhere possible.

It has never been more important to DOUBLE DOWN on protections which keep LOGGING and egregious degradation of our lands, particulary in our most precious NW forests, at a significant minimum....not to OPEN THEM UP to further clearcuts and wipeout not only of what's above the ground, but also of our mitigating soils and myceliumw which are so much more critical than forest science seems to understand. What we need is the crucial power of these forests and soils and trails and lands to mitigate carbon, provide babitat for multiple species, and protect our lands for the many uses humans also find important to spirit physic

habitat for multiple species, and protect our lands for the many uses humans also find important to spirit, physical and mental health.

At the time of the original NWFP, options were formulated by a team of highly respected FEMAT scientists that operated in the absence of political pressure and were skilled in old forest ecosystems, spotted owls, marbled murrelets, salmonids, and rare species (survey and manage).

Unfortunately most of this necessary NWFP expertise is greatly diminished in the DEIS that represents a major setback in the regional conservation strategy and the use of best available science inherent in the NWFP's origins.

In contrast to the original NWFP that based options on best available science (i.e., FEMAT) and a biodiversity/ecosystem management objective, the DEIS used a hand-picked FAC process that is a substantial departure from the original science emphasis on the plan's core conservation framework. Instead, the DEIS relies on a multi-stakeholder team to construct its preferred alternative with most members lacking the relevant expertise in: population viability (not a single FAC member); wildlife management (not a single FAC member); carbon life cycle analysis and carbon dynamics (not a single FAC member); spotted owl and marbled murrelet habitat needs (not a single FAC member); aquatic ecosystems, salmonids, and riparian areas (not a single FAC member); biodiversity as in survey and manage (not a single FAC member); impacts of postfire salvage logging and roads (not a single member); and conservation reserve design (not a single FAC member). Consequently, the groundbreaking science of FEMAT was shoved aside for a process-based approach that largely lacks the relevant expertise and foundational science of the original plan.

The NWFP was built on fundamental principles of conservation biology, including a coarse filter approach anchored by reserve distribution, connectivity, and reserve redundancy principles whereby the loss of late-seral forests in any one place or region (e.g., dry forests)

from natural causes would not affect the overall network in that region or across the owls' range (FEMAT, DellaSala et al. 2015). This was supplemented with a fine-filter approach focused on rare and poorly surveyed species (i.e., survey and manage); habitat needs of imperiled species associated with late-seral and intact watersheds (spotted owl, murrelet, salmonids); and watershed analysis to monitor and restore aquatic ecosystem integrity degraded by decades of road building and logging (i.e., the Aquatic Conservation Strategy).

As such the NWFP was deemed a global model in ecosystem management and biodiversity conservation and still is. That history of science-based options is clearly absent from the DEIS that rolls back forest protections using a house-of-cards series of questionable scientific and bioregional assessments (e.g., Spies et al. 2018 cited in theDEIS) previously criticized in comments yet ignored by the agency in the DEIS.

None of the action alternatives in the DEIS meet the 100-year timeline of the NWFP in restoring the ecological integrity of late-seral forests and dependent species. The recovery of imperiled species and ecosystems hinges on protecting the reserve network from logging and restoring some 40% of the previously degraded reserves recovering from clearcut logging by protecting ALL old trees (>80 years) from logging. The DEIS instead proposes substantial increases in old tree logging cloaked in highly subjective terms like

"resilience," "climate smart," and "stewardship."

It further blames forest losses on natural processes like wildfires and insects while downplaying logging as the main threat to ecosystem integrity even if at reduced levels. The FAC process essentially wiped away decades of underlying science on the 100-year timeline of the NWFP, replacing it with a questionable stakeholder process and agency led biased assessments. In doing so, the DEIS will harm & amp; degrade forest ecosystems and imperiled species due to increased logging of large trees and roads that would amplify climate-related drivers of ecosystem integrity decline. Importantly, we disagree with the modeling findings of Davis et al. linking 'declining' spotted owl habitat in dry forests to wildfires as the Davis models have not been ground-truthed and conflict with the published literature on owl use of high severity burn patches.

There is so much to say, but let me wrap up by making the main point:

The NWFP original was grounded in the science of its time and supported by subsequent analysis of the plan's efficacy over the decades of implementation of a plan meant to span 100 years given how much degradation occurred in the region from logging and road building. While the threats from barred owls and climate change have increased in that time span, this is no excuse for lifting old tree protections as the DEIS relies on a biased FAC process and selective use of the literature to support activities that are not restorative but degrading to ecosystem integrity. None of the action alternatives meet the original intent of the NWFP as the expansive use of logging will setback the decades progress of the original plan, amplify climate impacts by contributing emissions from logging large trees, cause cumulative impacts from logging, roads, livestock, and invasive species interacting with climate change, damage wildfire and climate refugia properties of the reserves and old forests generally (DellaSala et al. 2022b), and likely result in a jeopardy determination for the northern spotted owl and associated imperiled species.

Building a plan amendment on a faulty FAC process and the selective use of the literature including the agency's questionable scientific assessments does a disservice to what the original plan already has accomplished. The amendment should build on the NWFP accomplishments by additions to the reserve network rather than subtractions via allowing more logging in them.

Thank you for considering our comments in the DEIS.