

Data Submitted (UTC 11): 3/18/2025 3:31:45 AM

First name: D. Brady

Last name: Green

Organization:

Title:

Comments: Comments to Draft Environmental Impact Statement (DEIS) for the Amendment to the 1994 Northwest Forest Plan (NWFP)

D. Brady Green

March 17, 2025

Thank you for the opportunity to comment on this important amendment to the DEIS NWFP. Following are my comments. I am a retired 31-year federal employee with 27 years working as a fisheries biologist for the US Forest Service, the last 20 years on the Mt. Baker-Snoqualmie National Forest. I am very familiar with and have been working with the NWFP since its inception in 1994. I also attended the November 20, 2024 NWFP webinar presentation by the USFS.

#### NWFP Background

Since its creation in 1994 the Northwest Forest Plan (NWFP) has maintained and improved watershed conditions and helped reduce threats to ancient forests and species dependent on these ecosystems on federal lands. The Aquatic Conservation Strategy (ACS) objectives and Standards and Guidelines (S&G's) including for Riparian Reserves (RR), Key Watersheds, Watershed Analysis and Restoration, have been critical in protecting streams and rivers and other important aquatic habitats, and their dependent species. These S&G's do need more clarification and strengthening.

Late successional reserves (LSR) have also been helpful in protecting and enhancing conditions that promote long-term old growth forest. Harvesting forest stands greater than 80 years old in LSR was prohibited.

Due to lack of funding, much of the existing forest road system is in disrepair and needs at least basic maintenance (ditch and culvert cleanout, etc.) to maintain and improve aquatic habitats in each watershed.

#### DEIS NWFP

I support the NWFP regional approach to maintaining the viability of fish and wildlife associated with old growth forests and supporting local communities over the 24 million acres across Washington, Oregon, and California. This effort will be helpful in protecting old-growth forests, maintaining watershed integrity, and encouraging fire ecology in restoring fire prone areas.

#### Key Issues:

Lack of USFS Ability to Implement the NWFP.

Throughout the DEIS there are many statements and assumptions made about the number of US Forest Service (USFS) personnel and expertise there will be available to implement all the identified work (Sections 3.8 Sustainability of Regional Communities, 3.2 Increased Tribal Inclusion, 3.3 Forest Stewardship, 3.8 Sustainability of Regional Communities, 3.8.1.6 Federal Agency Employees, 3.9.2.1 Incorporation of Indigenous Knowledge and Increased Tribal Involvement, etc.).

Unfortunately, this has all changed under the Trump Administration. The USFS was already understaffed before the new administration took over and now has been hit with recent firings and planned near-term additional RIFs. This has greatly reduced the USFS capacity to accomplish work and must be described in the DEIS.

Not Including Any State Fish and Wildlife Agencies as Cooperating or Participating groups

Only the BLM, EPA, Washington Department of Natural Resources, and Oregon Department of Forestry, are listed as being Cooperating or participating agencies (Executive Summary, Section 3.9.2.2 Forest Stewardship).

Washington Department of Fish and Wildlife, Washington Department of Ecology, Oregon Department of Fish and Wildlife, California Department of Fish and Wildlife and California Water Quality Control Board were not included. These state natural resource, and fish and wildlife, agencies have the experience, expertise and jurisdiction over their state fish, wildlife, and water resources on USFS lands. The USFS manages the habitat on federal forest lands, while state fish and wildlife agencies, along with co-manager tribes in Washington State, manage the wildlife and fish populations on the same lands. In the past the USFS has always coordinated and

consulted with these agencies and Forest Plans require such formal consultation. Lack of involvement from these state agencies will result in poor project outcomes and lack of trust between agencies.

#### Environmental Justice

Recent Trump Administration executive orders (EO) have rescinded EO 12898 (Environmental Justice) which has been in place for 30 years, and may have rescinded EO 14096. How will the USFS plan to implement EO 13175, regarding tribal consultation at the project level in this DEIS?

#### Purpose Statement

The core of the stated purpose in the DEIS in both the Executive Summary and on page 105, states "Amending these land management plans would provide an opportunity for the forest Service to incorporate findings from the 2020 Bioregional Assessment; the Synthesis of Science and supplements, which identify changed conditions across the NWFP area since it was approved in 1994; and new information relevant to the NWFP including monitoring reports."

The Purpose is largely based on two USFS published papers, and unspecified "new information relevant to the NWFP including monitoring reports." The content and analysis of these reports is never described in the DEIS and cannot be considered. Additionally, some of the statements in those two reports are not supported by data and do not include other pertinent related published literature. The basis of the Purpose statement is in question since it is largely based on these two documents.

#### Key Comments on the DEIS:

- \*Do not raise the forest stand age limit in the NWFP that prohibited the harvesting stands greater than 80 years old in LSR to 120 years, as proposed in the NWFP. This would allow harvest of thousands of areas of fully functioning, natural forest, that is critical to maintain watershed integrity for ESA-listed threatened and endangered fish species and older forest wildlife species.

- \*Harvesting stands up to 120 years old will not contribute to the recovery of ESA-listed wildlife species (northern spotted owl, marbled murrelet, and coastal marten) or other old-growth dependent species, and will harm these species. Exceptions should be made for uniform, monoculture stands, that were artificially planted and have little ground cover and lack a multi-layer canopy, particularly old clear cuts. Encourage restoration of these logged forest stands in wetter forests, especially 80-120-year-old stands, to enhance structural complexity and other LSR characteristics.

- \*Maintain aquatic and terrestrial habitat connectivity by maintain existing forest roads that are important to provide recreation public access to trails and viewpoints. Due to lack of funding, much of the existing forest road system is in disrepair and needs at least basic maintenance to maintain and improve aquatic habitats in each watershed. There is no need to build new roads

- \*Improve S&G's that do a better job of restoring old-growth forest in dry forests by recruiting more trees from the largest and oldest size classes to help restore old-growth forest distribution and abundance across the region.

- \*Encourage restoration of logged forest stands in wetter forests, especially 80-120-year-old stands, to enhance structural complexity other LSR characteristics.

- \*Where feasible and practical, encourage wildland fire to restore ecologically appropriate fire behavior across the drier forests.

#### Specific Comments

The DEIS indicates that Watershed Analyses, an integral part of the ACS objectives and S&G's, will be updated, but there is nothing to support this claim, since they have not been updated in decades and current USFS staffing and funding is significantly reduced from the 1990's and will drop further in 2025 and beyond. As stated in the 1994 ROD S&G's, "Watershed Analysis is an analytical process and not a decision-making process with a proposed action requiring a NEPA document. Current/updated watershed analysis is required for support documentation for Riparian Reserve proposed actions and for Watershed Restoration proposals."

Section 1.9 Issues on page 1-10 lists seven issues, including Biological Resources and Air Quality, but fails to discuss these two issues in the DEIS. Throughout the entire DEIS there is no description of the Affected Environment and Environmental Consequences of effects of timber harvest and road construction on Hydrology,

Soils, and Water Quality. There is no explanation as to why these critical resources are not discussed in the DEIS. Analysis of the potential effect on these resources and natural processes must be included in the DEIS. The effects on air quality are discussed but there is no analysis of the potential impact to water quality which is a critical resource that would be impacted under any of the action alternatives.

Section 1.10 Other Resources Considered or Dismissed indicates that the text of the ACS will not be changed and assumes that the USFS is currently abiding by all the requirements in the ACS, which is not true. It also assumes that abiding by the ACS avoids significant adverse effects to aquatic and riparian resources. This however is not always true. The ACS requires that the extent of riparian reserves (RR's) be identified, but the distances from streams can vary, and are not consistently identified in similar situations between projects and Forests.

The ACS allows timber harvest in riparian reserves if the action can be analyzed and justified that it would reduce fire risk or improve stand conditions. These two exceptions have been used to justify a wide range and intensity of timber harvest and resultant yarding in RRs as ACS does not identify any set "no cut buffers" within RR's. Buffer widths vary greatly from project to project and are often inconsistent among similar locations with similar resource concerns.

The Purpose Statement beginning on page ES 1-4, states "The purpose of the Proposed Action is to amend, all or part of 17 national forest land management plans, as amended, within the NWFP area to establish new or modify existing plan components to better enable the Forest Service to meet the original intent of the 1994 NWFP to conserve mature and old-growth ecosystems and habitat for the conservation of northern spotted owl and other Endangered Species Act (ESA) listed and non-listed species, protect riparian areas and waters, and provide sustainable supply of timber and non-timber forest products."

The DEIS fails to provide data and justification for how this Purpose would be achieved through amending the 1994 NWFP under Alternative B, the "Preferred Alternative to "conserved mature and old-growth ecosystems and habitat for the conservation of northern spotted owl and other Endangered Species Act (ESA) listed and non-listed species, protect riparian areas and waters." It contends that cutting large, mature trees would accelerate the growth of old-growth over the "long-term" but never defines this and is unacceptably vague. The DEIS also contends that removal of large mature trees would not adversely affect the very limited current habitat for the northern spotted owl, marble murrelet, and other species dependent on these large mature stands. Growth of old-growth stands take many decades, if not centuries, and removal of suitable mature trees now under the premise that more old-growth will occur in decades in the future has the potential to cause severe adverse effects in the foreseeable future. There is no data and justification included in the DEIS that supports that Alternative B will improve habitat for these ESA-listed species within the next few decades.

Page ES-1 states "In recent years, large, high-severity wildfires have resulted in losses of mature and old-growth forests, eliminating gains achieved during the first 25 years of implementation." There is no data included in Chapter 3 to support this statement, in fact, Section 3.4.1 (Trends) contradicts increased mortality of old-growth trees in recent years. Protection of old growth trees is stated to be a primary goal of need to revise the NWFP, so data on fire mortality to old-growth must be included. In addition, the DEIS does not cite, much less discuss, any published literature that predicts significant increases in mortality of old-growth trees on moist forests. Old-growth trees are the least susceptible to fire, followed by large mature trees on both "wet" and "dry" forests. On the same page it states "Research on climate change and on the effects of past forest and fire management regimes indicates that large wildfires and other disturbances will increase in frequency and extent throughout the area covered by the NWP." This implies that fire regimes will change every basin on every forest within the 17 national forests, which is not supported by the published literature.

## Chapter 2. Alternatives

All the Action Alternatives should focus on younger trees, especially plantations regenerating from clearcuts since about 1950 when the USFS began heavy and widespread clearcutting as the primary timber management method, which means stands that are less than 80 years old in many locations.

The acres and timber volumes proposed to be treated on "dry" Forests is significantly more than current USFS staff and funding has the capacity to implement and staffing is already decreasing under the Trump Administration. This makes targeted increases in timber production under Alternatives B and D unachievable, setting up the USFS for failure. In addition, it is unclear in the DEIS if the targeted volumes under action

alternatives are based solely on acres that are truly available, and do not include any wilderness, roadless, other administratively withdrawn allocations, acres of recent treatment, acres within recent wildfire footprints, or other areas where timber harvest could not occur. The USFS needs to make sure that such areas have not been unintentionally included in the ASQ targets.

Alternative B would have conflicting goals between recruiting and maintaining mature and old-growth stands, versus providing much greater annual supplies of timber. To achieve the land stewardship goal only smaller, younger trees in LSR's should be harvested (less than 80 years old on "moist" Forests, and less than 21-inch dbh on "dry" Forests).

#### Chapter 3. Affected Environment and Environmental Consequences

The chapter fails to include the affected environment and environmental consequences regarding: Clean Water Act; soil erosion and potential landslide and slope stability related to the preferred Alternative B; hydrology; Magnuson-Stevens Act; Migratory Bird Treaty Act; EO 11988 - Floodplain Management; Wild and Scenic Rivers Act. There is a brief discussion of the Clean Air Act, but no discussion of these other important laws that are more relevant to the proposed action. Even though the DEIS is programmatic in nature there is no justification for these issues to not be assessed in this DEIS or its Appendices.

The only place that the effects to hydrology is even mentioned is in issue 6. Climate Change. Excluding these issues regarding large scale increases in timber harvest in this DEIS is unacceptable.

There is no discussion whatsoever, about the impacts of additional permanent and temporary roads and drainage features associated with the extensive logging planned, in areas where new roads would need to be built, or re-opened and later decommissioned, or continued to be maintained.

In addition, extensive timber harvest, yarding, and new roads will result in decreases in canopy cover, snowpack retention, evapotranspiration, and soil cohesion. In addition, soil temperatures and erosion and increased risk of slope failures in some locations will occur. None of these are discussed in the DEIS and no discussion whatsoever about hydrology or soils in the DEIS. Extensive timber harvest will result in lower and more extended periods of low summer baseflows in some project areas, negatively affecting aquatic species. Also, they will increase the magnitude, frequency, and durations of storm flows in some locations which can degrade stream habitat and adversely affect aquatic and riparian dependent species.

To fulfill this requirement, the USFS will have to incorporate language into various sections of the 1994 S&G's and ROD Attachment A, using ACS Section B of the S&G's as an example.

#### Section 3.4 - Fire Resistance

##### Section 2.3.23 Wildfire Resilience and Section 3.4 Fire Resistance and Fire Resilience

Neither of these sections provide any data, including no summarized data, estimating current acreages and percent total of Forest land area via categorization by ages, species, and diameters in the 17 Forests within the NWFP. This data summary is needed to depict the affected environment and justify the need to increase the maximum allowable age trees from 80 to 120 years in LSR's (per Alternative B) on "moist" Forests to help increase fire resilience.

The same lack of data is true for "dry" Forests. Thus, the affected environment is not adequately described, and there is not enough information to help assess if the proposed increase in the maximum allowable harvest from 21-inch dbh to 24-inch dbh would meet the purpose and need regarding both fire resilience (Issue 3) and forest stewardship (Issue 2). This information needs to be added for both "wet" and "dry" Forests. In addition, the DEIS needs to explain why there are age limits on "moist" Forests, but diameter limits on "dry" Forests.

The DEIS needs to, at a minimum, estimate the approximate acreages of current stand conditions of trees younger than 80 years, those 80-120 years, those older than 120 years, and those that are old-growth (defining old-growth in years since the proposed actions are limited by age on "moist Forests). This could be done by Forests (they have it), by ecoregion, at any practicable scale. The DEIS needs to be revised to estimate the acreage of trees 21-inch dbh or smaller, those from 21 to 24-inch dbh, those larger than 24-inch, and those depicted as old-growth on "dry" Forests. This information is not provided in the DEIS, therefore, the USFS does not have sufficient data to justify and defend the need to harvest larger trees. All the DEIS does regarding any data about the affected environment is refer to other documents and it relies heavily on the Bioregional Assessment of Northwest Forests (USDA Forest Service 2020). This document is an overview with few specifics and does not provide information sufficient to justify and analyze how the Preferred Alternative B supports the

#### Purpose and Need.

The DEIS also does not provide, or even discuss, USFS produced and supported fire behavior and fire risk modeling on either "moist" or "dry" Forests for any of the alternatives. Considering that Fire Resistance and Fire Resilience is stated as being one of the four driving issues that represent the need to revise the NWFP, such modeling using easily accessible USFGS models is key, and need to be utilized.

There is also no discussion whatsoever about the increased potential for fires due to the slash from pre-commercial harvest. Some current and recent USFS EA's for vegetation management projects in "moist" Forests within the NWFP specifically state that the proposed action would increase fire risk for the first two or more decades due to slash. None of this is disclosed in the DEIS.

#### Section 3.5 - Biological Resources

##### Moist Forest - LSRs

This section states "Under Alternatives B and D, the age where timber harvest can occur in "moist" forest stands within LSRs would change from stands under 80 years (under Alternative A) to stands under 120 years. In addition, timber harvest would be authorized in "moist" forest stands older than 120 years in LSRs under Alternatives B and D to provide for tribal co-stewardship and cultural use to reduce wildfire risk to communities (FORSTW-LSR-MOI-STD-01)." The types and general range in numbers and acreage when trees older than 120 years could be harvested "to provide for tribal co-stewardship and cultural use and to reduce wildfire risk to communities" need to be provided.

##### Moist Forest - Matrix

This section states "In moist forests within Matrix, Alternatives B, C and D, would restrict harvest, with a few exceptions, in old-growth stands established before 1825 (FORST-MTX-MOI-STD-01) and add constraints on timber harvest in mature stands established between 1825 and 1905 to treatments that maintain and restore ecological integrity (FORSTW-MTX-MOI-GDL-01). This would result in additional conservation of mature and old-growth stands under Alternatives B, C, and D, as compared to Alternative A. Under Alternative A, these mature and old-growth stands in the Matrix would be available for timber harvest, with some constraints."

The addition of these age limitations for Matrix lands is very good. What approximate acreage of trees in Matrix that were harvested that were established before 1825, and what is the current approximate acreage of trees that were established before 1825? How many stands will this change impact and are there many trees still existing in Matrix that are older than 1825?

##### Dry Forest

This section states "Alternatives B, C, and D, would also add a standard (FORSTW-ALL-DRY-STD-01) regarding conservation and protection of older trees within dry forests in all LUA's. Under Alternative B and C, vegetation management and harvest would retain all trees older than 150 years, with the exceptions for tribal cultural uses and co-stewardship, restoration of unique ecosystems, and to reduce wildfire risk to communities and infrastructure. Alternative D would retain all trees established before 1850, with the same exceptions as under Alternatives B and C."

This paragraph lists a lot of exceptions to the age limit of 150 years and there is no description of the possible range in numbers and acres that those exceptions may comprise on an annual or other time frame. In addition, the goals and desired future conditions would be for tribal co-stewardship and "restoration of unique habitats" that would require harvesting trees older than 150 years need to be provided. What types of "unique habitats" and approximately what range of acres may they comprise?

##### Aquatic, Riparian, and Wetlands

This section describes how Alternatives B and D "may have effects on aquatic, riparian and wetland ecosystems" even though the text of the ACS would not change. It also states "For example, the increased use of prescribed burns under Alternatives B and D (see Table 3-13, FIRE-ALL-OBJ-02) could lead to increased fines and nutrients within the water column, alter the riparian canopy in a manner that could lead to increased solar energy and higher water temperatures, or affect water quantity through the removal of riparian vegetation."

This is one of the few, if not sole place in the entire DEIS that discusses adverse impacts to water quality, water temperature, or water quantity. The DEIS needs to be revised to contain a section in Chapter 3 for Hydrology and Soils that analyzes these and other variables. Additional variables would include, but necessarily be limited to, erosion potential from new or rebuilt roads, as well as yarding, soils compaction from roads and yarding,

impacts to low flow and storm event magnitudes and recurrence intervals, and general possible impacts to soil moisture. Alternatives B and D plan to treat about 5 million acres per decade. These resources and natural processes must be addressed in the DEIS.