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First name: Larry
Last name: Glass
Organization: Safe Alternatives for our Forest Environment
Title: Executive Director
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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

Re: Northwest Forest Plan Amendment Draft Environmental Impact Statement

Dear Regional Foresters Buchanan and Eberlien:

Please accept the following comments on the Northwest Forest Plan Amendment (NWFP) Draft Environmental Impact Statement (Draft EIS) from the Northcoast Environmental Center (NEC) and the Safe Alternatives for our Forest Environment (SAFE). The NEC has been advocating on behalf of the environment in the Pacific Northwest for over 50 years and SAFE has been for 45 years. SAFE and the NEC have been acutely involved in the review of the NWFP and have on the ground expertise on forest management and health practices.

The original purpose of the Northwest Forest Plan (NWFP) was to ensure viability of Late Successional Old Growth (LSOG) dependent species. These species across the board are in serious decline and their habitat has been seriously degraded or in some cases eliminated. The only way to stop this precipitous decline in these sensitive species is to protect the remaining habitat that these species, associated with LSOG, need for survival. Our forests must be kept viable to support these populations and should be well distributed across the planning area, resulting in a high likelihood of species and survival persistence over an extended period of time. Any amendments to the original Northwest Forest Plan must guarantee species viability and prioritize habitat conservation and preservation over timber harvesting.

The NEC and SAFE would like to echo the concerns voiced in the comment letter submitted by Cascadia Wildlands. The letter was signed on to and contributed to by numerous environmental groups representing thousands of concerned constituents and community members who will be affected by the proposed NWFP.

We ask the agency to support or improve analysis of the following components in the Final Environmental Impact Statement and any resulting decision:

Support Tribal Sovereignty and Indigenous Knowledge: Any decision made by the Forest Service should advance all of the Tribal Inclusion components analyzed in each of the action alternatives in the Draft EIS. The Forest Service should collaborate with Tribes to identify and manage for desired ecological conditions and

support Tribal management for first foods and species as defined by Tribes. The agency should revise and further expand the Tribal Inclusion section in the Draft EIS to provide a more comprehensive analysis that reflects the breadth and importance of the proposed plan components to Indigenous communities and more accurately discloses the impacts of the proposed amendment on Tribes.

Elevate Environmental Justice: The Forest Service should address environmental justice by analyzing impacts on air, water, and communities and ensuring fair, sustainable working conditions.
Ensure Recreation Access: The Forest Service Draft EIS does not consider the effects its proposed increased logging will have on outdoor recreation opportunities in the region. Outdoor recreation is one of the primary economic drivers in the region, and timber harvest usually requires large area closures during and following implementation that disrupts these recreation activities and access. There are myriad economic benefits from leaving landscapes intact, including recreation, fishing, and water quality. The Forest Service must analyze these economic benefits in the Final EIS.

Ensure Adequate Staffing and Funding: The efficacy of the Forest Service's proposed logging to reduce wildfire hazards in the region will depend on the work being done in the appropriate forest type, what the logging prescriptions are, and ensuring post-logging treatment of slash piles and repeated burning and follow up treatment/removal of undergrowth vegetation responses. The Forest Service must ensure that these practices are appropriately staffed and funded, otherwise logging will only increase fire risk.

We also request the agency exclude any components in the final plan that would lead to the following outcomes:

Weakened Protections for Mature and Old-Growth Forests: We support the parts of the proposed amendments that provide long-overdue protections for mature and old-growth forests. Communities value these areas because they are resilient to wildfire, provide essential habitats for a host of imperiled species, store carbon, serve as climate refugia, and protect water quality. However, the draft amendments redefine these forests in a way that leaves far too many of them open to logging and road building. The Forest Service has no social license for commercially exploiting mature and old-growth forests.

Altered Purpose of Late-Successional Reserves (LSR): In the Draft EIS, the Forest Service proposes expanding the purpose of LSR management to include the "restoration" of habitat for species that depend on young forests. Restoring young forests is a euphemism for regeneration harvest, and including this as a LSR objective directly contradicts the purpose and role of these reserves, which were designed to achieve late-successional and old-growth characteristics. The shift would inappropriately allow new and unprecedented regeneration harvest in these reserves. While our organizations support management to restore traditional and historic oak woodlands and other meadow habitats, provisions to facilitate this management exist elsewhere in the plan. If the Forest Service genuinely wanted to restore young forest habitat, it would not permit salvage logging following natural disturbances. This change to the fundamental purpose of these reserves undermines the reserves network's purpose and efficacy and will increase fire risk across the planning area.

Weakened Protections for Imperiled Fish and Wildlife: The Draft EIS encompasses changes that radically alter the fundamental assumptions and management of forest habitats depended upon by a host of wildlife species, including the northern spotted owl, marbled murrelet, marten, red tree vole and numerous imperiled aquatic species, including salmon. The effects of the proposed changes on these species and their habitats must be properly analyzed and considered by the decision maker.

Fire Resilience Efforts That Remove Mature Trees: Fire risk reduction efforts should focus on community preparedness and home hardening. Any logging practices that may be used to increase fire resilience must focus on retaining the larger-diameter trees in the stand, work to increase overall tree diameters in the stand in the short-term, and avoid negative impacts to wildlife and carbon storage. These treatments must also be accompanied by prescribed burning, as studies have shown thinning alone to be ineffective at altering wildfire

behavior. These treatments also have no ecological justification in moist forests.

Alterations to the Survey and Manage Program: The Draft EIS discusses recommendations to eliminate the Survey and Manage program that documents and protects unique and uncommon species and their unique habitats. We agree with the Forest Service's conclusion that any changes to this program are outside the scope of the proposed amendment and cannot be addressed through this process. This program is vital and should continue.

Expansions to the Road Network: The Draft EIS fundamentally fails to consider impacts from road construction, which could harm key watersheds, drinking water, and habitat for salmon and other species, and increase the costs of proposed logging. The Forest Service should be focused on reducing the overall road network in the Northwest Forest Plan area. The Draft EIS as written mandates aggressive timber targets that will require extensive road construction or reconstruction. An analysis of the requisite road effects is necessary to inform a responsible decision on this amendment.

Additionally the NEC and SAFE would like to see the final EIS address the following concerns:

The NWFP needs to implement practices that stand behind its declared purpose of "protecting and enhancing biodiversity of mature and old growth ecosystems" and aim to broaden these ecosystems, not extract from them.

No trees over 80 years old should be removed from "moist" OR "dry" climates.
Herbicide use should be prohibited and replaced with mastication, chipping, goats, cultural burning, and prescribed fire.

Clear guidelines need to be set, not left to the discretion of the local ranger, including designating areas that prohibit and areas that limit cutting.

Maintaining canopy cover is critical for climate resiliency, reducing risk of wildfires, supporting wildlife and endangered and threatened species that depend on old growth and mature forests, and for enhancing the cooler temperature conditions present in closed canopy forests.

Treatment of ground fuels to reduce the risks of wildfire must include these limitations: retain old trees and large mature trees and reduce threats to them; limit new and reconstructed roads; prohibit any mechanical entry into all Roadless Areas; and use only hand crews to protect soils, retain wildlife snags and logs, retain and enhance fire resilient hardwoods across the landscape.

Implement regulations that prohibit private leasing of public lands.

Prohibit local government management of public lands which would result in a broken mosaic of forest management practices that impedes ecosystems across watersheds and undermines processes for avoiding cumulative impacts.

Avoid compromising habitats that would result in a taking under USFWS terms.
Avoid practices that would result in carbon sequestration loss due to increased logging of previously protected areas.

Establish clear parameters for "post-wildfire silvicultural direction" and other practices being designated as fire and fuel reduction. These parameters need to minimize logging and emphasize management for desired ecological conditions, as identified in collaboration with Tribes, in order to avoid ultimately leading to more intense fires and destruction.

The Forest Service should limit its timber cutting targets to no higher than has been present for the past three decades. Currently the proposed timber cutting targets would result in as much as a 300% increase in annual cut from what it has been since 1994. This is unacceptable under the declared purpose of the NWFP.

In conclusion the primary focus of the NWFP, and the amendment process, must be to attain ecological sustainability of forest habitats and species and develop management for desired ecological conditions, as identified in collaboration with Tribes. The NWFP should be building wildfire resilience with the use of prescribed burning and indigenous knowledge practices in consultation with Tribes. Management practices need to be aimed at increasing mature and old-growth forests, improving biodiversity, climate sustainability, and wildfire resilience. Compliance with the Endangered Species Act must be required, and management practices must be aimed at recovery of imperiled fish and wildlife species and their habitat. The NWFP must prioritize habitat restoration, conservation and connectivity over timber production.

Thank you for your consideration.

Sable Odry
Advocacy Co-Director
Northcoast Environmental Center
advocacy@yournec.org

Larry Glass
Executive Director
Safe Alternatives for Our Forest Environment
larryglass71@gmail.com ; safeintrinitycounty@gmail.com