March 17, 2025

To: Regional Foresters Jacque Buchanan and Jennifer Eberlien

From: Olympic Climate Action olyclimate@olyclimate.org

Submitted online via
https://cara.fs2c.usda.gov/Public//CommentInput?Project=64745

Dear Regional Foresters Jacque Buchanan and Jennifer Eberlien:

Thank you for the opportunity to comment on Northwest Forest Plan Amendment #64745 draft environmental impact statement (DEIS).

Olympic Climate Action is a grassroots organization of more than 800 citizens from across the Olympic Peninsula of Washington State dedicated to research, education, and action on climate change since 2012. We are a membership organization with a board, and both our board and membership make decisions by consensus or super-majorities. In this case, our board of directors has unanimously approved this letter.

Our members are intimately familiar with Olympic National Forest and many other National Forests managed by the Northwest Forest Plan (NWFP). We advocate for and support the myriad values of these evergreen forests, including biodiversity, carbon sequestration and storage, water supply and quality, fire resilience, and climate and fire refugia for innumerable creatures, including endangered species. Many of us have worked in scientific, stewardship, and educational capacities in these forests and other forests and ecosystems neighboring them.

In composing our comments, we acknowledge the inspiration and education of FireGeneration Collaborative, Wild Heritage, and the Pacific Northwest Forest Climate Alliance. (Citations herein, except where noted, are available in the 613 pages of PDFs submitted by Dominick DellaSala of Wild Heritage in comments dated February 20, 2025; many of these same sources are cited on Olympic Climate Action's website at https://olyclimate.org/resources/#forest-and-climate.)

Of paramount importance to us is that the temperate rainforests managed under the NWFP are essential to the mitigation of climate change, and their ability to provide enduring carbon storage is primarily due to the restrictions on logging since the Plan's implementation (Krankina et al. 2012). The region's high carbon density, stored mostly in late-seral forests protected under the NWFP (Krankina et al. 2014), provides an unmatched climate mitigation benefit.

For these reasons, we are committed to continuing the stewardship of the NWFP area for future generations.

The DEIS Has Some Good Elements (Though No Good Alternative)

We are glad to see the inclusion of tribal consultation, use of indigenous burning and youth education, and the possibility of co-stewarding. Fire inclusion should use the best fire ecology science and traditional knowledge.

We applaud the recognition of fire as an essential ecological process and the difference between fire ecology in the wetter moist forest types like here on the Olympic Peninsula, and the drier east-side forests. While our Fire Return Interval and stand-replacing fire history in the moist forests were not as impacted by a century of fire suppression, it will be good to reintroduce prescribed/cultural burns in the dry forests and perhaps in limited places for early seral habitat diversity in moist forests.

We appreciate the emphasis on community/home hardening, since we know that the majority of acres burned are in high winds in dry conditions (both of which will increase in incidence as the planet warms) and have burned right through "treated" areas, even clearcuts (not to mention that much of the West's burned acreage is in non-forested habitat like grasslands and shrublands). However, the 1-mile buffer is excessive. Please use the best fire science to guide these actions. Dollars spent to help homeowners and communities take prudent steps to protect their structures will pay back far more than those spent on ineffective thinning (Calkin et al. 2023–see https://www.fs.usda.gov/rm/pubs_journals/2023/rmrs_2023_calkin_d001.pdf).

In similar fashion, high impact fire suppression techniques (bulldozed lines, too-hot back burns, retardant, etc.) should be minimized, both for their cost and their ecological impacts.

The original NWFP was unprecedented for its ecosystem scope, involvement of scientists, and 100-year perspective. It was viewed as a global model in ecosystem management and biodiversity conservation when it was enacted and remains so to this day (DellaSala et al. 2015). Unfortunately, none of the action alternatives in the DEIS rise to the 100-year timeline of the NWFP in restoring the ecological integrity of late-seral forests and dependent species. The inclusion of both beneficial and harmful elements in each alternative promotes flawed choices in the DEIS response process, whereby there is no alternative which we can whole-heartedly support. The deck has been stacked, and there is no reference condition described so the public can assess the level of degradation from alternative forest treatments.

The DEIS Promotes Logging Through Bad Science

The rushed Federal Advisory Committee (FAC) process overrode decades of underlying science on the 100-year timeline of the NWFP, replacing it with a questionable stakeholder process and agency-led, biased assessments. The ground-breaking science of the original Forest Ecosystem Management Team was side-stepped by a process-based approach that lacks the relevant expertise and foundational science of the original NWFP, leading to a DEIS that is not based on best available science. Instead, the DEIS rolls back forest protections using a series of questionable scientific and bioregional assessments (e.g., Spies et al. 2018, cited in the DEIS) previously criticized in comments (such as by Wild Heritage) that were ignored by the agency when compiling the DEIS. Notably, the agency science assessments were never peer reviewed, yet peer reviewed science submitted in prior comments (by commenters such as Wild Heritage) was ignored.

The FAC's members lacked the relevant expertise to properly address a myriad of scientific issues, including population viability, threatened species' habitat needs, aquatic ecosystems, carbon dynamics and life cycles, impacts of postfire salvage logging and roads, and conservation reserve design. Protecting endangered species, the core tenet of the original NWFP, seems almost lost in this proposed amendment, abandoning the Forest Service's obligations as the steward of late-seral forests linked to the viability of dependent species.

The DEIS Promotes Logging Through Euphemism and Skewed Accounting

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 trees older than 80 years from logging (DellaSala et al. 2015). The DEIS instead proposes substantial increases in logging of older trees cloaked in vague, feel-good terms like "resilience," "climate smart," "stewardship," and "ecoforestry," all of which can mask commercial logging practices including removing large, old trees and building roads. "Ecoforestry" in forests over 80 years old has been questioned as an untested concept in the NWFP area (Rossman and Kramer 2022–see https://drive.google.com/file/d/1932q6H6iaY5bH2rq4sqPAe83hxzYF2yN/view?usp=drive_link) that is damaging to older forests and does not stimulate the development of complex early seral forests generated by stand-replacing natural disturbances (DellaSala et al. 2013, Odion et al. 2013, Raphael et al. 2013 – a government report), but none of this contra-indicating research was noted in the DEIS.

The DEIS lacks a hard look using proper carbon accounting and life cycle analysis (Hudiburg et al. 2019) on how the preferred alternative will contribute to substantial releases of carbon that at the scale of the NWFP area would likely eclipse that of the natural disturbances in the region (Campbell et al. 2007, Harris et al. 2016, Law et al. 2018, Hudiburg et al 2019, Harmon 2019, Moomaw et al. 2019, Harmon et al. 2024, Moomaw and Law 2024). As it stands, the DEIS is biased toward reporting on a very small portion of carbon that is retained in wood product pools (Law et al. 2018, Hudiburg et al. 2019) that vastly exaggerates wood product pool benefits (Harmon 2019), and largely ignores impacts on soil carbon, with studies typically only sampling the top 15 cm of soil, whereas the vast majority of soil carbon lies deeper and has been shown to diminish after thinning (Rossman and Kramer 2022–see above). This can only be fixed by comparing DEIS alternatives to each other on an honest scale and then choosing the one with the lowest logging emissions and road building impacts. If the DEIS were to do so, it would demonstrate the need to manage the reserve network for carbon stock retention by protecting large trees from logging (Krankina et al. 2012, 2014, Brandt et al. 2014, Law et al. 2018).

The DEIS Entails Unacceptable Logging Impacts

Mature and old-growth forests are natural carbon-storing champions, resilient against wildfire, and critical to mitigating and adapting to climate change. These forests provide essential habitat for imperiled species like the northern spotted owl, marbled murrelet, and coho salmon, and they filter and protect drinking water for communities across the Pacific Northwest.

The DEIS blames forest losses on natural processes like wildfires and insects, whereas logging is the main threat to ecosystem integrity (DellaSala et al. 2022, 2025). With the justification of increased logging based on "fuels reduction," all alternatives in the DEIS eliminate protections for unlogged mature forests in Late Successional Reserves (LSRs, originally designated to be managed for mature and old-growth forests), increase clearcutting of mature and old-growth forests in Matrix lands managed for timber production, and increase logging in dry forests. These changes would double or triple logging levels across our public forests, open mature and old-growth trees to removals, and weaken protections for our climate, clean water, and wildlife habitat.

Where thinning of older forests has been attempted on the Olympic Peninsula, unforeseen challenges were experienced due to unexpected levels of blowdown and seedling die-off from winds, drought, and heat, which will accelerate with climate change (https://olympicforestcollaborative.org/old-home/monitoring-forest-health/).

Furthermore, given the damage to soils, carbon storage and increased risk of hotter and windier fire conditions, the Amendment should not allow salvage logging or thinning in older matrix lands or the fire-resistant older forests in the LSRs. Burned forests maintain the majority of their carbon and myriad habitat benefits, far exceeding any benefits of post-fire logging (DellaSala and Hanson 2024). The road building associated with salvage logging increases the risk of human-caused ignitions (Balch et al. 2017) and spread of non-native plants (Ibisch et al. 2016) which are themselves fire hazards and threats to forest ecological integrity. In any salvage logging on younger forests, large snags should be left for structural diversity, wildlife use, shade, and moisture retention when they fall.

Summary

In addition to helping to lessen the severity of the climate crisis, our older Pacific Northwest forests critically help to buffer the impacts of climate change that we will be unable to avoid. Their role in protecting water resources, averting flooding, and reducing wildfire risk will be crucial for communities such as ours in coming decades. The Amendment should acknowledge the numerous studies that show how logging produces far more greenhouse gas emissions and ecological disturbances than natural disturbances, and it should strengthen or expand protections for forest reserves to recruit more habitat, protect streams, and enhance carbon storage—not reduce them or open them to logging.

Thank you for the opportunity to comment and for your consideration,

The Board of Directors of Olympic Climate Action:
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