

The Honorable Ron Wyden  
221 Dirksen Senate Office Building  
Washington DC 20510

The Honorable Patty Murray  
154 Russell Senate Office Building  
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The Honorable Jeff Merkley  
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The Honorable Alex Padilla  
331 Hart Senate Office Building  
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The Honorable Maria Cantwell  
511 Hart Senate Office Building  
Washington DC 20510

The Honorable Adam Schiff  
112 Hart Senate Office Building  
Washington, DC 20510

Re: NWFP Amendment Draft Environmental Impact Statement

February 25, 2025

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Dear Senators,

The U.S. Forest Service is currently accepting public comments on a Draft Environmental Impact Statement proposing to significantly amend the Northwest Forest Plan. For the past 30 years, the Northwest Forest Plan has provided a global example of a successful and comprehensive landscape-scale ecological management strategy. Covering 24.5 million acres across 17 national forests, it was developed as a 100-year plan. It has simultaneously conserved and recovered habitat for imperiled species like salmon, northern spotted owls, and marbled murrelets, protected drinking water supplies, and stored immense quantities of carbon from the atmosphere as a natural – if originally unintended – climate solution. We are writing to respectfully request that, as leaders of the Pacific Northwest region, you call on the Forest Service to uphold and strengthen conservation measures in the Plan, support Tribal sovereignty, advance environmental justice, and strongly oppose any weakening of protections for mature and old-growth forests.

Thirty years after the Plan's adoption, climate change and biodiversity concerns have only intensified, making protection and recruitment of mature and old-growth forests even more important. One of the most impactful measures the Pacific Northwest region can do to address these crises is to uphold and strengthen the Northwest Forest Plan's conservation directives.

The Northwest Forest Plan encompasses lands occupied and stewarded by over 80 Tribes since time immemorial. As it considers future management of national forests, the Forest Service must uphold its obligation to genuinely consult Tribes during decision-making processes. This

includes providing resources and support necessary to ensure equitable access to these processes and engaging with Tribes in a way that respects their sovereignty and connection to the Pacific Northwest's forests and waters.

The Forest Service should also prioritize environmental justice, which should include assessing the proposed amendments' impacts to air quality, water quality and quantity, climate, recreation, and cultural use, and in particular, impacts on communities already burdened with pollution, nature deprivation, and conversion of cultural and historical areas. The agency should also ensure safe, sustainable, and equitable working conditions and fair compensation for people working in forest management.

Incorporating Traditional Ecological Knowledge, facilitating Tribal involvement, and addressing environmental justice concerns in the management of national forests are all incredibly important. Because of their importance, they should not be tied to weakened conservation protections.

Amendments to the Northwest Forest Plan must retain and strengthen the network of old-growth and mature forest reserves where natural processes flourish, and maintain and recruit habitat needed by imperiled species like northern spotted owls, marbled murrelets, and Pacific fisher in order to persist and recover. Amendments must also adequately protect streamside habitat that provides cool, clean water supplies for communities and salmon, while at the same time ensuring our Pacific Northwest forests continue to achieve their potential as carbon sinks that help mitigate climate change. These goals can all be achieved by maintaining the Plan's current standards and guidelines that protect mature and old-growth forests from logging while also adopting new components to advance Tribal sovereignty and environmental justice.

Unfortunately, none of the action alternatives described in the Draft EIS adhere to these core elements. Instead of focusing on recovering more old-growth forest, which remains at a severe deficit across the landscape, the proposed amendment exploits fears about wildland fire to double – and potentially triple – commercial logging from current levels. This dramatic increase would occur across a smaller footprint than the original Northwest Forest Plan, since the Bureau of Land Management removed 2.6 million acres of Western Oregon forest lands from the protective management plan. In other words, all the adverse impacts associated with commercial logging – road-building, sediment delivery to streams, loss of carbon storage, disturbance and degradation of species habitat – would be even more concentrated in national forests.

The Forest Service's fire suppression, fire exclusion, and commercial logging policies have significantly altered forests and worsened fire dangers. Under the guise of addressing wildfire threats, the agency has focused on increased logging across national forests. Logging mature and old-growth trees, though, is counter-productive to protecting communities and restoring fire to

the landscape. These trees are the most fire-resilient, and focusing on logging them takes resources away from proven community protection strategies such as creating defensible space and emergency preparedness. Commercial logging replaces fire-resilient older forests with more flammable young stands and can create drier conditions, making fire danger worse, while logging roads and other infrastructure increase the risk of human-caused fires. The agency should prioritize protecting communities over encouraging commercial logging, and establish the strongest possible protections for mature and old-growth trees as part of its integrated wildfire management strategy.

The Forest Service's proposal also shifts the fundamental purpose of the Northwest Forest Plan from recovering more old-growth forest across the landscape to, at best, maintaining what little old-growth remains. While we recognize the agency's goal of supporting communities with timber production, it is important to recognize that national forests provide a host of resources beyond timber volume, including abundant drinking water, a thriving outdoor recreation industry worth tens of billions of dollars, and one of the most powerful carbon-storing ecosystems in the world. Timber harvest should only occur as a by-product of ecologically appropriate restoration in younger stands that retains fire-resistant legacy trees and structure.

As written, the agency's proposed alternative would open up over 800,000 acres of mature forests to commercial logging that is not ecologically necessary and create new loopholes to allow logging in reserves meant to protect fish, wildlife, and drinking water. The amendment would also permanently lock existing mature forest stands out of potential protection, which could severely limit recruitment of future old growth to replace what will naturally be lost to disturbance over time. Despite admitting in the Draft EIS that wildlife species that rely on older forests would be adversely affected by these changes, the Forest Service has not offered any measures to ensure protection of mature and old-growth habitat needed for the survival of endangered species. As proposed, the amendment will increase the risk of extinction for northern spotted owls and potentially require restrictive new measures on state and private lands to offset the loss of habitat on public lands, contrary to the Plan's original purpose.

In conclusion, we strongly oppose the Forest Service's proposal to weaken the safeguards of the Northwest Forest Plan and significantly expand commercial logging in mature and old-growth forests across the Pacific Northwest. Our region is facing twin extinction and climate crises, and this proposal would make both of them worse. We support reforms that would lead to better Tribal consultation, co-stewardship and integration of Indigenous perspectives into the management of our national forests. The Forest Service can and should improve Tribal inclusion and environmental justice in forest management while at the same time preserving and advancing ecological protections in our national forests. Again, we ask you to call on the Forest Service to uphold and strengthen the Plan's conservation measures, support Tribal sovereignty, and advance environmental justice. We also ask that you tell the agency that any amendment that

weakens core protections for mature and old-growth forests and the suite of water quality, species habitat, and carbon storage values they provide should not move forward.

Sincerely,

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