



Olympic Park Advocates

Regional Forester
U.S. Forest Service
1220 SW 3rd Avenue
Portland, OR 97204

RE: Northwest Forest Plan Amendment Draft Environmental Impact Statement (DEIS)

Olympic Park Advocates (OPA) is pleased to comment on the Northwest Forest Plan Amendment #64745 DEIS. OPA is a grass-roots citizens organization focusing on Olympic National Park and the larger Olympic ecosystem, which of course includes Olympic National Forest (ONF).

We participated in the original 1994 Northwest Forest Planning process. The resulting Northwest Forest Plan (NWFP) promised to maintain and enhance the terrestrial and aquatic ecosystems of the ONF and pivot toward recovery of federally listed threatened and endangered species and species of concern. We are deeply troubled that the science-based process that guided development of the original NWFP -- and focused on the viability of hundreds of late-seral stage species in the northern spotted owls' range -- has been traded for a stakeholder-based federal advisory committee approach.

We fear, and the DEIS reflects, an emphasis on commodity outputs over science-based ecological recovery. By increased logging of large trees and road building in Late Successional Reserves (LSR), the preferred alternative would compound climate-driven degradation of spotted owl forests.

While the 1994 plan reduced drastic overcutting of the Olympic National Forest at the time, from more than 300 million board feet to about 30 million, it came up short in its promise to restore ecosystems or recover threatened and endangered species. We feel any amendment to the plan should have these at top objectives.

We view the changes put forward in the preferred alternative (B) of the Amendment, as well as alternative D, as further reducing the likelihood of recovering threatened and endangered species on the ONF and other national forests, or of placing the ONF and other forests on a stronger path to ecological recovery. These alternatives would more than double logging on national forests ostensibly to meet a variety of questionable goals while reducing the functional network of Late Successional Reserves needed to anchor recovery.

OPA endorses Alternative C of the NWFP Amendment but with significant modifications. Further, we would like to focus our comments on the Amendment primarily as it applies to and will affect the Olympic National Forest. In this regard, we found all alternatives to be lacking; the preferred alternative is no exception. To restore owl forests' biodiversity, alternatives should focus treatments on previously logged plantations, nearly all of them under 80 years of age, and increase protections in Late Successional Reserves, not open them to more logging.

Importantly, the (1994) plan brought protection to the multitude of fish-bearing and fish-influencing streams in the rain-soaked ONF under the Aquatic Conservation Strategy. The ACS was an innovative and important measure but aquatic preserves have proven inadequate for protecting peninsula watersheds and recovering salmon. The preserves should be maintained and expanded, with less logging allowed within them. We are concerned that few watershed analyses have been completed since the '94 plan. Aquatic protection in the DEIS should be guided by these.

Late Successional Reserves should be maintained and expanded as well. We disagree with redefining old growth forests from 80 to 150 (in dry forests) and 120 years (in moist forests). This would open LSRs to significantly more logging at a time when forests like Olympic are in an early stage of ecological recovery, and when threatened northern spotted owl and marbled murrelet populations on the ONF and throughout the planning region continue to decline. This category should be maintained at 80 years.

No adequate data has been provided in the DEIS on the need to cut large trees in moist or dry forests, but it is taken on faith that restoration or ecological logging requires it. Unfortunately, the National Old Growth Amendment was

rescinded early in 2025, further confusing the issue. How will the USFS protect old growth in light of this? The DEIS should clarify this issue.

It is our view that salvage logging will only exacerbate habitat damage. New road construction associated with salvage logging will have negative impacts on forest and aquatic habitats, allowing siltation of salmon streams, corvid predation of murrelets, introduction of non-native plants, increasing fire hazard, and reducing wilderness character.

The 1994 plan was sound in designating no Matrix lands on the ONF. This reflects decades of unsustainable overcutting. No new Matrix lands should be designated on the ONF in the DEIS.

We find the DEIS lacking in carbon accounting and management. The preferred alternative will result in substantial releases of carbon as a result of removing large trees, road construction and transportation. The DEIS fails to adequately evaluate this. Numerous studies demonstrate that logging produces far more carbon emissions than natural disturbances. Large trees sequester carbon. Managing for carbon sequestration also benefits a vast range of beneficial ecosystem services and moderates global warming.

OPA endorses increased tribal inclusion. We are concerned that decreased agency funding and recent and projected reductions in staff and a high rate of turnover will make co-management goals impossible to achieve.

OPA has reviewed the North Cascades Conservation Council's detailed analysis of the NWFP Amendment, and we fully support and endorse the recommendations contained within it.

Thank you for this opportunity to comment.

Tim McNulty
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