

AMERICAN BIRD CONSERVANCY + CASCADIA WILDLANDS + CENTER FOR BIOLOGICAL DIVERSITY + EARTHJUSTICE + ENDANGERED SPECIES COALITION + ENVIRONMENTAL PROTECTION INFORMATION CENTER + KLAMATH FOREST ALLIANCE + UMPQUA WATERSHEDS + WESTERN ENVIRONMENTAL LAW CENTER + WILDEARTH GUARDIANS + WILD HERITAGE + 73 INTERNATIONAL, STATE AND LOCAL CONSERVATION ORGANIZATIONS

June 4, 2024

Brenda Mallory
Chair
White House Council on Environmental Quality
Washington D.C. 20503

Dear Chair Mallory:

On behalf of the undersigned conservation groups we ask that the administration please include the Endangered Species Act Recovery and Climate Mitigation Alternative outlined below in the Northwest Forest Plan amendment draft EIS. Building on the climate mitigation, old forest habitat protection, and watershed restoration successes of President Clinton's Northwest Forest plan needs leadership from President Biden now to ensure the preferred alternative will include the strongest protections for old forests to continue this legacy.

We recommend the amendment continue the Plan's focus on recovering the Northern Spotted Owl, Marbled Murrelet and salmon stocks in the region suffering from insufficient late-successional habitat. Further protection of the immense carbon stores and carbon sequestration capacity of mature and old forests along with large trees in dry forests within the range of the Northern Spotted Owl will help mitigate climate change and ensure that older forests and large trees continue to act as climate and wildfire refugia.

Thank you for considering this request for including a biodiversity and climate preferred alternative that includes protecting all stands and large trees over 80 years in age, prohibiting post-disturbance salvage logging in the reserves, and increasing logging buffers in occupied Marbled Murrelet habitat to reduce forest fragmentation, and the resulting nest predation of murrelet chicks.

We are concerned about the proposed Northwest Forest Plan amendment as currently outlined by the Forest Service is framing the amendment as only needed to respond to wildfire. The most significant change requiring a plan amendment is the 2012 Northern Spotted Owl Critical Habitat Rule that protects approximately 40% of the matrix or areas the Plan had slated for logging. This substantial amount of added habitat protection should be incorporated into the preferred alternative.

A loophole in the existing Plan which needs to be closed is post disturbance logging within the late-successional reserves. There is overwhelming scientific evidence that post-

disturbance logging inhibits natural forest regeneration, emits substantial carbon, pollutes streams with sediment runoff, damages soils, and increases future fire risks.

The amendment could also boost Marbled Murrelet recovery that is being hindered by high rates of nest predation. Doubling the current murrelet buffers from ¼ mile from the nest to a ½ mile would ensure a higher degree of protection for the chicks, and further boost the Plan's already significant carbon storage benefits.

We recommend the dry forests be managed as reserves with an emphasis on protecting large trees larger than 21 inches as in the eastside screens. These trees store the bulk of above ground carbon and are naturally resistant to wildfires. The reserve designation is best suited to guide restoration and fuel reduction in a complicated landscape that includes patches of wet and dense forests, and the endangered Northern Spotted Owl. Beaver reintroduction in unoccupied areas should also be included to restore aquatic areas and increase drought resilience.

Thank you for all your efforts to advance bird and habitat conservation. Please let us know how we can be of assistance.

Sincerely,

Steve Holmer
Vice President of Policy
American Bird Conservancy

Dr. Dominick A. DellaSala
Chief Scientist
Wild Heritage, Project of Earth Island Institute

Randi Spivak
Director of Public Lands
Center for Biological Diversity

Blaine Miller-McFeeley
Senior Legislative Representative
Earthjustice

Sristi Kamal
Deputy Director
Western Environmental Law Center

Thomas Wheeler
Executive Director
Environmental Protection Information Center (EPIC)

Grace Brahler
Wildlands Director
Cascadia Wildlands

Tara Thornton
Director of Institutional Engagement
Endangered Species Coalition

Ryan Talbott
Pacific Northwest Conservation Advocate
Wildearth Guardians

Janice Reid
President
Umpqua Watersheds

Kimberly Baker
Executive Director
Klamath Forest Alliance

Drew Feldmann
San Bernardino Valley Audubon Society

Travis Longcore
Los Angeles Audubon Society

Catherine Rich
The Urban Wildlands Group

James A. Peugh, Conservation Chair
San Diego Audubon Society

Dan Silver
Endangered Habitats League

Michael J. Painter
Californians for Western Wilderness

Blanche Wicke
Oakland Bird Alliance

Paul Hughes
Forests Forever

Nancy Pearlman
Ecology Center of Southern California

Rene Voss
Natural Resources Law
Western Alliance for Nature

Ara Marderosian
Sequoia ForestKeeper

David Harrison
Salem Audubon Society

Patricia Hine
350 Eugene

Debbie Schlenoff
Lane County Audubon Society

Duke Tufty
East Cascades Audubon Society

Chandra LeGue
Willamette Valley Broadband
Great Old Broads for Wilderness

Dave Willis
Soda Mountain Wilderness Council

Diana Wales
Umpqua Valley Audubon Society

Luke Ruediger
Applegate Siskiyou Alliance

Mary Fleischmann
Central/Eastern Oregon Bitterbrush Broads
Great Old Broads for Wilderness

Ann Vileisis
Kalmiopsis Audubon Society

Darlene Chirman
Great Old Broads for Wilderness, Cascade-Volcanoes Chapter

Chant Thomas
Dakubetede Environmental Education Programs

Patricia Jones
Olympic Forest Coalition

Allen Gibbs
Pilchuck Audubon Society

Lora Leschner
President
Washington Association of Retired Fish and Wildlife Employees

Diann MacRae
Olympic Vulture Study

Taylor Goforth
South Sound (Olympia) Broadband
Great Old Broads for Wilderness

Timothy Coleman
Executive Director
Kettle Range Conservation Group

David Robinson
Tucson Audubon Society

Delia G. Malone
ColoradoWild

Thomas Jervis
New Mexico Audubon Council

Anne Millbrooke
Bozeman Birders

Clinton Nagel
Gallatin Wildlife Association

Maryland Ornithological Society
Kurt R. Schwarz

Karen Ashikeh
Earth Neighborhood Productions

Chance Cutrano
Resource Renewal Institute

Lisa Owens Viani
Raptors Are The Solution

David A. Moskowitz
The Conservation Angler

Maureen Hackett
Howling For Wolves

Frederick Krueger
National Religious Coalition on Creation Care

Richard Miller
Planetary Emergency Institute

Allen Johnson
Christians For The Mountains

Marybeth Lorbiecki
Interfaith Oceans

David Krantz
Aytzim: Ecological Judaism

Melanie Lary
FOUR PAWS USA

Jennifer Riley
Blue Ridge Wildlife Center

Ellen Ribolla
Eden Wildlife Rehabilitation & Release

Charlene Kerchevall
Wildbirds Unlimited

Ed Friedman
Friends of Merrymeeting Bay

Douglas Harr
Iowa Audubon

Larry Federman
Northern Catskills Audubon Society

Georgianne Spates
Eastern Long Island Audubon Society

Brian Allen
Manistee Audubon Society

Sherilyn Burns
Greater Akron Audubon Society

Nancy Hillstrand
Cook Inlet Regional Association

Nancy Hilding
Prairie Hills Audubon Society of Western South Dakota

Robin Buff
Northwest Arkansas Audubon Society

Stephen Cottrell
Delaware Audubon

Anne Swaim
New York State Ornithological Association
Saw Mill River Audubon

Laura Neale
Rockbridge Bird Club

Chris Allieri
NYC Plover Project

Michael Kreger
Columbus Zoo and Aquarium

Gail B. Mackiernan
Montgomery Bird Club

Colette Buchanan
Monmouth County Audubon Society

Jim Boone
BirdAndHike.com

Rogard Ross
Cape Henry Audubon Society

David Lowe
RSPB (Royal Society for Protecting Birds)

Constantine Aucca
ECOAN

Dr. Silke Nebel
VP Science and Conservation
Birds Canada

Suzanne Asha Stone
International Wildlife Coexistence Network