

Ms. Jacqueline Buchanan, Regional Forester  
Pacific Northwest Region, United States Forest Service  
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RE: Request for 120-Day Comment Period on the Northwest Forest Plan Amendment Draft  
Environmental Impact Statement

Dear Regional Forester Buchanan:

October 19, 2024

Thank you for your work to modernize the Northwest Forest Plan (NFP) to address key issues facing the national forests within the range of the northern spotted owl. As organizations that have long worked in our region to uphold the ecosystem principles of the NFP, we are supportive of using the best available western and Indigenous science to amend the NFP.

As you know, controversy around forest management in the Pacific Northwest has a long history that continues to evolve. It is important to get the NFP amendment right, and to do so with robust public involvement and Tribal consultation. We are concerned that the proposed 90-day comment period on the draft environmental impact statement (DEIS) will be insufficient to provide the public, Tribes, and other stakeholders with sufficient opportunity to review and provide their perspectives on the amendment. Therefore, we ask that you extend the comment period to 120 days in the forthcoming Federal Register announcement noticing the availability of the DEIS for comment.

The Forest Service has [proposed to release](#) the DEIS in November 2024. A 90-day comment period would span the presidential election, use-it-or-lose-it annual leave for Forest Service employees, the year-end holidays and the new year, and the inauguration of a new administration. This period of time will be extremely busy for the public as well as agency employees. The Forest Service also plans to host field trips and office meetings to discuss the amendment – additional public engagement opportunities that are appreciated and appropriate, but also time consuming to design, implement, and attend. Further, given the changing of administrations during this time period, agency attention will be needed to assist with onboarding new administration officials. Likewise, the Forest Service’s National Old Growth Amendment (NOGA) is expected to be completed by the end of December 2024. The public will need sufficient time to review the final NOGA, assess how it intersects with the proposed NFP amendment, and incorporate these considerations into their comments on the NFP DEIS.

All of these factors weigh in favor of providing the public with a 120-day comment period on the DEIS. Informing the public at the start of the comment period, in the Federal Register announcement noticing the availability of the DEIS, that they will have ample time to review the proposed action and alternatives, seek clarifications from agency staff, discuss the DEIS with those affected by the amendment, and provide written comments also saves the Forest Service time and energy later when it becomes clear that a 90-day comment period was inadequate.

Thank you in advance for your consideration of this request. If you have any questions, please do not hesitate to contact Susan Jane Brown, Principal & Chief Legal Counsel, Silvix Resources ([sjb@silvix.org](mailto:sjb@silvix.org); 503-68-5513).

Sincerely,



Susan Jane Brown, Principal & Chief Legal Counsel  
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