

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

January 27, 2024

submitted electronically via webportal

Re: Northwest Forest Plan Amendment Scoping Comments

Dear Ms. Buchanan:

Thank you for acknowledging that the Northwest Forest Plan will be 30 years old this year and is in need of substantial changes due to new science, monitoring data, and unanticipated events like climate change, increased wildfires, and the rise of the barred owl as the primary limiting factor in the recovery of the northern spotted owl.

I have engaged, as a member of the public, in management of the Gifford Pinchot National Forest for nearly 50 years. I had opportunities to see and hear northern spotted owls on the forest in the 1980s and 1990s. I have a file drawer filled with copies of comments and objections to Gifford Pinchot timber sales that were logging oldgrowth forest and northern spotted owl habitat in the 1980s. I closely followed President Clinton's Forest Conference in 1993 and the development of the Northwest Forest Plan in 1994.

Although the Northwest Forest Plan protected some oldgrowth forests, it did not protect all older forests. This amendment is an opportunity to build on what has worked well over the past 30 years while updating it to the 21st century.

Comments on Amendment Focus Areas

- **Fire Resistance and Climate Resilience**

The current amendment language is vague. For example, it could lead to more logging under the guise of fuels reduction while research shows that thinning forests usually does not preclude large blazes under extreme fire weather.

Fire risk reduction should focus on community preparedness. The idea that fire suppression is the reason for our recent large wildfires, such as the Santiam Canyon Complex in 2020, ignores the influence of climate change and weather conditions. We are constantly bombarded with the myth of fuels reduction, which becomes a convenient reason to have timber sales. The conditions that create large fires include severe drought, low humidity, high temperatures, and, most importantly, high winds. These were exactly the conditions that drove the Santiam Canyon Complex fires. Wind-blown embers are responsible for most of the structure losses.

I often hear state and federal forest managers declare that there have been a hundred years of fire suppression. Yes, starting in the 1920s and 1930s, the Forest Service sought to limit fires, but statistics suggest this wasn't particularly successful. Statistics verify there were fewer large blazes between the 1940s and 1980s. Before government agencies take credit for their ability to suppress fires, however,

they must consider that the decades between the 1940s and the 1980s were one of the wettest periods since the Little Ice Age. My personal collection of photographs taken on hikes and backpacks in Washington's South Cascades in the 1970s and 1980s support that statement. We traveled across snow-covered landscapes well into August. Beginning in the late 1980s, the climate shifted, likely due to human carbon emissions, growing warmer and drier with prolonged droughts. Under those climate-weather conditions, large blazes occurred across the West, including the Gifford Pinchot National Forest. The shift in climate is a much better explanation for the increased fire and acreage burned than fire suppression. The only sensible responses are to promote home hardening and defensible spaces and to stop building homes and businesses in the Wildland Urban Interface.

- Mature and Old-Growth Forest Management

All remaining oldgrowth forests should be protected. Logging of oldgrowth forest in the Matrix should be prohibited. Only half the acreage in Late Successional Reserves is oldgrowth; the rest of the acres are old plantations from the 1960s and 1970s on their way to becoming mature forest.

All remaining mature forest should be protected, no matter what the management allocation. It is imperative that forests on the cusp of becoming oldgrowth be protected. Also, more early seral forest should be allowed to become mature so there is a recruitment pipeline to replace mature or oldgrowth forest lost to fires, windstorms, insects and disease. Reserves should focus on habitat and ecosystem health and landscape connectivity.

The amendment should consider the importance of intact forests to climate resilience. Carbon sequestration should be the primary objective of at least some, if not all, mature and oldgrowth forests, perhaps through the designation of carbon reserves.

- Community and Economic Considerations

Focus on ecological restoration of dense young forests. Achieve social and economic objectives through hiring and training local people to do restoration work. This is an important area for Tribal collaboration since this is an area where Traditional Ecological Knowledge can be combined with western science to achieve many non-timber objectives, such as sustainable production of first foods like camas and huckleberries and materials like beargrass. Riparian restoration is another area to achieve social and economic objectives.

I support Tribal inclusion and co-stewardship in the Northwest Forest Plan Amendment. Climate change has affected the interactions of humans, fire and vegetation for over 9,000 years in the Cascades Mountains. During that time, the climate has oscillated from warm and dry to cool and moist several times. These shifts caused humans to react to and interact with biophysical processes to maintain food, medicinal and material resources. Indigenous or Traditional Ecological Knowledge can be integrated with Western science to improve understanding of many aspects of the environment, including the condition of our forests at the time of Euro-American contact.

- Wildlife Habitat Protections

The Northwest Forest Plan Amendment should incorporate direction from the Revised Recovery Plan for the Northern Spotted Owl. Land managers should modify forest management practices at the nest site, territory, and forest stand scale to address the primary long-term cause of northern spotted owl population declines: the loss and fragmentation of mature and old growth forests. Barred owl removal cannot be considered in a vacuum without addressing this other key driver of northern spotted owl population decline.

I encourage a holistic approach to protecting all remaining old growth and mature closed canopy forests in large forest blocks, restoring late-seral stage habitats and establishing habitat connectivity across all land ownerships. Decades of protecting the absolute minimum habitat while allowing aggressive logging on federal, state and private lands has placed the northern spotted owl in this precarious position. Conserving and restoring older multi-layered forests across the range of the northern spotted owl will help the species to be resilient to future impacts of natural disturbances and climate change. Many other wildlife species will benefit from northern spotted owl habitat protections, including other species now considered rare, like torrent salamanders.

I urge a return to the original scientific vision behind the Northwest Forest Plan: a restored, interconnected network of oldgrowth forest reserves. Political leaders at the state and federal levels and the public increasingly seem to recognize the value of these oldgrowth forests, particularly as a natural climate solution. President Biden's Executive Order 14072, "Strengthening the Nation's Forests, Communities and Local Economies," recognized the value of oldgrowth forests and has led to development of the companion National Oldgrowth Forest Plan Amendment to this Northwest Forest Plan Amendment.

Sincerely,

A handwritten signature in cursive script that reads "Susan M. Saul". The signature is written in black ink and is positioned below the word "Sincerely,".

Susan Saul