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Regional Forester
US Forest Service
1220 SW 3rd Avenue
Portland OR 97204
<https://cara.fs2cusda.gov/Public//commentsInput?Project=64745>

RE: Comments regarding the Notice of intent to prepare an environmental impact statement for Region 5 and Region 6; California, Oregon, and Washington; Forest Plan Amendment for Planning and Management of Northwest Forests Within the Range of the Northern Spotted Owl (NWFP).

I am commenting on information presented at in the Federal Register (88 FR 87393).

First and foremost is to conduct meaningful consultation with all affected tribes as required by treaty.

Where consistent with tribal goals and consultation and after consultation with USFWS on threatened and endangered species as required by law, consider implementing the following concepts.

The highest goal for ecosystems within the NWFP area is to provide stable and non-disturbed mature and old growth forest. Old and mature forest has:

- intrinsic value;
- documented high productivity;
- conserves moisture and stream conditions;
- provides habitat for threatened and endangered species such as the marbled murrelet, the northern spotted owl, the coho salmon;
- provides habitat for a wide variety of plants and animals;
- provides resistance to fire due to moisture and canopy height and decay rates of materials on the forest floor.

Growth and age are advantaged by low or no disturbance which includes prohibiting the removal of trees through logging, thinning and other approaches. So that, tree removal should only occur if trees (dead or live) pose an imminent safety hazard. No new roads, right of way corridors and/or special use permits should be allowed. This goal is the top goal for the area encompassed by the previous Northwest Forest Plan (NWFP). Roads not only disturb soils but are also a continuing source of noise. Corridors for electric lines require tree pruning and/or removal ad infinitum into the future. Prescribed fire should be used sparingly and designed to reduce surface fuels and provide a non-flammable substrate (char). Northern Spotted owls, marbled murrelets and salmon do not thrive under disturbance!

Since the BLM lands that were once included in the NWFP are now managed under a different plan without consideration of preserving mature and old growth forest, it is imperative that the remaining lands under consideration in this effort be managed for the values of mature and old growth forest, keeping in mind that some forests are not just old but ancient (greater than 1000 years of age).

Old growth provides an important habitat for other plants, particularly lichens and orchids due to its height, moisture, structure and special substrates such as arboreal soils, fungal development and down woody material. Some plants need these features to survive and reproduce and have a difficult time moving through other habitats that do not provide these features. There are orchids that need fungus gnats from decaying wood as pollinators. There are ferns that only grow on the trunks of trees. There are whole ecosystems dependent upon arboreal soils and micro ponds in the canopy. Preserving old growth, maintaining mature forest that will become old growth and minimizing disturbance is very important to maintaining these ecosystems and providing diversity into the future.

Johnson *et al.* (2023) identify that the following concepts and practices are important to include in this revision:

- Cease logging of older, unmanaged forests and of remnant old trees in younger forests;
- Prohibit salvage logging in (previously designated) LSRs [late successional reserves];
- Utilize treatments, including thinning and burning, to restore old dry forests to approximations of their historical states.

I add that using fire and perhaps thinning or reducing stand density outside of and around mature and old forest stands to accomplish fuel reduction and preserve mature and old growth forest would be an effective step in preserving and protecting mature and old growth forests.

Establishing standards for the initiation of fuel reduction and standards for down woody retention would help to define what is enough and what is too much woody debris.

Establishing monitoring and measuring protocols and conducting regular monitoring would help to demonstrate the effectiveness of this plan and actions taken.

Johnson *et al.* (2023) identify that taking actions to: Restore salmon habitat in the ranches, farms, cities, and towns of the lower watersheds (on private lands) is important and might produce the greatest improvement for money spent and I add that restoring in-stream salmon habitat and applying prescribed fire to reduce fuels in riparian areas on National Forest Lands is a companion action to produce an overall improvement in habitat.

Johnson *et al.* (2023) identify that “Work toward landscapes that allow for expression of a variety of life histories.” Is important. I add that only 10% of area and not more needs to be in early seral stage (please see attachment Roche 2024, Development of old growth). Or this project can work through the numbers to identify the desirable and limiting amount of early seral desired.

Increase the amount of density reduction (thinning) in riparian corridors only in forest plantations on NFS lands. But maintain variable spacing between trees, so that trees will grow at different rates and remove or treat fuel with fire so that riparian areas do not become wicks to move fire under dry and windy conditions. Maintain shade on stream surface.

While Johnson *et al.* (2023) emphasize the following: “Continue to reduce density (thin) in younger forests across the landscape. At least 20% of these forests should remain untouched. Use variable retention goals and methods in younger (historic designation) matrix and removal of dead, burned trees in burned (historic designation) matrix.” I add that you should implement these actions around and nearby the oldest old growth and reduce fuels in these areas.

Literature Cited

Johnson, K. N., J. F. Franklin. 2023. The Making of the Northwest Forest Plan the Wild Science of Saving Old Growth Ecosystems. OSU Press, Oregon State University, Corvallis, OR.

Spies, Thomas A., J. F. Franklin, 1991. The structure of natural young, mature, and old-growth Douglas-fir forests in Oregon and Washington. In: Ruggiero, Leonard F.; Aubry, Keith B.; Carey, Andrew B.; Huff, Mark H., tech. eds. Wildlife and vegetation of unmanaged Douglas-fir forests. Gen. Tech. Rep. PNW-285. Portland, OR: U.S. Department of Agriculture, Forest Service, Pacific Northwest Research Station: 91-109.

Attachment:

Roche, Kathleen S. 2024. Development of Old Growth. On file at 63255 Stonewood Drive, Bend, OR97701