



January 29<sup>th</sup>, 2024

Liz Berger, Acting Regional Forester  
USDA Forest Service Region Six  
1220 SW 3<sup>rd</sup> Avenue  
Portland, Oregon 97204

RE: Scoping comments on Northwest Forest Plan revision

Dear Ms. Berger:

Thank you for the opportunity to provide scoping comments in support of the *Forest Plan Amendment for Planning and Management of Northwest Forests Within the Range of the Northern Spotted Owl*. Under its previous name (Forest Conservation Council), Center for Sustainable Economy played a major role in getting the existing Northwest Forest Plan (NWFP) in place. Overall, we are pleased about the slow but steady recovery of natural forest ecosystems on federal forestlands in the Pacific Northwest but are concerned that continued political pressure to undue the NWFP's existing protections will undermine that progress. In light of these concerns, we ask you to consider the following as you work to develop a set of management alternatives responsive to the issues you have flagged:

**Improving fire resistance and resilience across the NWFP planning area.**

Research and on-the-ground observations by firefighters have found a consistent pattern: the vast networks of logging roads, short rotation timber plantations, and open clearcuts on state and private lands surrounding our federal forests burn hotter, faster, and more severely than lands where industrial timber harvesting is not allowed. On federal lands, research has also shown that intensive logging by any name – i.e. thinning, salvage, restoration – also increases fire risk by drying out soils, increasing windthrow, accelerating rate of spread, increasing fuel loadings, and providing increased human access and corresponding risk of ignition. As such, natural forests on Forest Service and BLM lands within the range of the northern spotted owl serve as firebreaks buttressing rural communities against the threat of catastrophic wildfires. Any management alternatives that introduce or expand industrial logging or intensive thinning practices on federal forestlands will reduce fire resistance and resilience.

**Strengthening the capacity of NWFP ecosystems to adapt to the ongoing effects of climate change.**

Intensive logging and roadbuilding generate significant greenhouse gas (GHG) emissions and make the land more susceptible to climate change by increasing risks associated with wildfires,

droughts, water shortages, floods, wind damage, invasive species, landslides, and human exposure to novel diseases. The only way to strengthen the capacity of NWFP ecosystems to adapt to climate change is to phase out commercial logging activities, close and revegetate logging roads, and reintroduce natural processes to the maximum extent practicable. New CEQ guidance requires that the Forest Service quantify the GHG emissions associated with logging, roadbuilding, and other management activities and otherwise account for climate change effects in the National Environmental Policy Act (NEPA) analysis that will accompany the NWFP revision process. By carefully following this new guidance and fully disclosing climate impacts of the various alternatives being considered, the Forest Service will be able to select a management alternative that maximizes climate resiliency.

**Improving conservation and recruitment of mature and old-growth forest conditions, ensuring adequate habitat for species dependent upon mature and old growth ecosystems and supporting regional biodiversity.**

The existing network of late successional reserves (LSRs) on federal forestlands has not proven adequate for conservation of species that depend on mature and old growth conditions. Monitoring data for all threatened, endangered, and sensitive species show many are declining at an alarming rate. Older forest bird populations are especially at risk. One problem is that existing reserves are too small and too far apart and are not inclusive of many high-biodiversity areas, such as the remaining fragments of old growth forests that exist at low elevations below 2,000 feet. In addition, they are being fragmented by industrial logging practices on adjacent state and private lands. The NWFP revision is an opportunity to correct these deficiencies by (1) expanding the network of LSRs to include rare plant community types and low elevation habitat; (2) excluding all forms of commercial logging and roadbuilding from these areas; (3) modifying right of way agreements with adjacent landowners to leverage improved forest practices on state and private lands; (4) designating corridors to connect late successional reserves and other protected areas across the landscape and allow for migration of species as climate change unfolds.

**Incorporating Indigenous Knowledge into planning, project design, and implementation to achieve forest management goals and meet the agency's general trust responsibilities.**

We applaud efforts to incorporate Indigenous Knowledge into planning, project design, and forest plan implementation. Indigenous Knowledge is an excellent source of scientific information about conditions on federal forestlands prior to colonization, industrial logging activities and other forms of forest degradation and can help identify compositional and structural attributes important to forest restoration activities. NWFP management, to date, has shown very little evidence of incorporating this knowledge so we would like to see the revised NWFP describe specific steps the agency will be taking in the future.

**Providing a predictable supply of timber and non-timber products, and other economic opportunities to support the long-term sustainability of communities located proximate to National Forest System lands and economically connected to forest resources.**

We are not aware of any statutory requirement for providing “predictable” supplies of timber from federal forestlands. Please remove this as phrase from the description of this topic area. As noted above, using federal forestlands as a source of predictable timber supply means locking in decades of increased GHG emissions and reduced climate resilience. Nor does supplying timber from federal lands make sense from an economic perspective. The market, non-market, use and non-use values of protected federal forestlands vastly outpace the economic benefits of adding to an already over bloated supply of timber to US mills and vast overconsumption of wood products. Commercial logging on public lands is also a money-loser for US taxpayers and, as such, is a form of environmentally harmful subsidy being targeted for phase-out by several international sustainable development initiatives that the US has endorsed.

Thank you for the opportunity to offer these brief comments. We look forward to participating in the NWFP revision process as it unfolds. Please include CSE as an interested party in all future correspondence.

Sincerely,



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