

Wednesday, January 31, 2024

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

Subject: Protect forests, wildlife, and communities by strengthening the Northwest Forest Plan -- Northwest Forest Plan Amendment #64745

To Secretary of Agriculture Tom Vilsack, USFS Chief Randy Moore, Acting Pacific Northwest Regional Forester Elizabeth Berger, and Pacific Southwest Regional Forester Jennifer Eberlien:

I urge you to strengthen and expand the protections afforded by the Northwest Forest Plan to safeguard our drinking water, wildlife, and mature and old-growth forests. The Northwest Forest Plan has successfully conserved millions of acres of our national forests and any amendments must recognize the critical role these public lands play in providing: cold, clean water for people and wildlife; inspiring places for contemplation and recreation; older forests home to rare species, thereby enhancing and protecting biodiversity; climate change mitigation; and job opportunities.

The Northwest Forest Plan was enacted to halt and reverse the devastation caused by past logging and road building practices, which were driving the extinction of old-growth-dependent wildlife like northern spotted owls and marbled murrelets, polluting our water, and destroying ecosystem function. Successful restoration efforts in the Pacific Northwest are being guided by this a unique regional ecosystem management strategy that has allowed previously harvested public forests an opportunity to regrow, while also protecting critically important mature and old growth-forests. Under this landmark conservation plan, the region's forests went from being a source of carbon emissions to a significant carbon sink—a rare and much-needed climate success story. The Plan has largely been successful, but in light of the climate and extinction crises, it must be expanded to protect our last remaining mature and old-growth forests and the benefits they provide to all of us.

An amendment to the Northwest Forest Plan should pay particular attention to protecting mature and old-growth forests, which were not equally protected by the initial policy. These older forests offer unique habitat that species like the northern spotted owl and salmon need for survival, and are culturally important for many different communities—including Tribal Nations. These forests are increasingly rare in the United States, and face escalating threats from climate change impacts like fire, drought and insect damage.

The pressures from climate-driven threats, along with increased scientific understanding and information gleaned from the Northwest Forest Plan's monitoring protocols, highlight the need for targeted updates to the plan to maintain healthy, resilient forests.

In modernizing the Northwest Forest Plan, it is crucial that we ensure that beneficial ecosystem services continue to flow from our national forests and that they are able to adapt to a changing climate. An amended Northwest Forest Plan must:

- Protect and conserve all remaining mature and old-growth trees and forests in both moist and seasonally dry forests to preserve ecosystems, save more carbon-storing trees, and improve fire resilience. While the Northwest Forest Plan reserved many older forests in 1994, it did not protect them all, which has led to controversy among stakeholders. Thus, the Northwest Forest Plan amendment must sustain and replenish older trees and forests into the future.
- Ensure consistency with President Biden’s 2022–23 Executive Orders on forest protection and climate resilience, including the 30x30 initiative, which recognize the critical role our National Forests play in halting the climate and biodiversity crises.
- Preserve biodiversity and improve connectivity of wildlife habitat. This includes not only threatened and endangered species, but all species that have been impacted by the loss and fragmentation of their habitat. Conservation of the northern spotted owl, marbled murrelet, and native salmonids was a cornerstone of the 1994 Northwest Forest Plan, and an amendment should only maintain and enhance protections for at-risk fish and wildlife. The Northwest Forest Plan amendment should bolster efforts to recover wildlife, recognizing the ongoing threat of climate change and past management practices. To protect biodiversity in the era of climate change, the amendment must ensure habitat resilience from disturbances such as wildfire, drought, disease, and insects.
- Protect and expand the reserve network of the Northwest Forest Plan. The Plan has been a success because it moved many older forests into “reserves” that limited commercial logging. It is imperative that these reserves continue to be protected from attacks by the timber industry.
- Protect complex early-seral forests from logging. We worsen the condition of present and future fire-affected forests by “salvage logging” after fires, which destroys the soil and important wildlife habitat, pollutes our water, and erodes natural forest regeneration processes.
- Recognize and address the effects of climate change, particularly the increase in very large and severe wildfires. While the Northwest Forest Plan considers the essential role that wildfire plays in our forests, the size and severity of wildfires has far exceeded expectations. The U.S. Forest Service should reassess current management strategies in light of escalating wildfire threats and consider incorporating Indigenous cultural burning practices.
- Increase and improved Tribal involvement in forest management of their ancestral lands and increase use of Traditional Ecological Knowledge. Consultation with local

Tribal Nations and incorporation of Indigenous Knowledge will be critical steps for the Forest Service to take in amending the Northwest Forest Plan.

- Recognize shifts in the region's socioeconomic landscape since 1994 and de-emphasize timber production. While forest management will continue to be a part of the Pacific Northwest economy, recreation and other pursuits now draw more people to the region than ever before. The amended plan must set new timber targets that recognize communities' decreased reliance on forest exploitation and more appropriately limit the amount of commercial logging that occurs on public lands. Building a modern forest restoration workforce will contribute to ecological resilience of our National Forests and ensure continued public enjoyment of these lands we all value. Mature and old-growth trees are worth more standing than logged.
- Expand and strengthen the Aquatic Conservation Strategy. The ACS has been one of the most successful components of the Northwest Forest Plan, but as climate change and the freshwater extinction crises worsen, expanded riparian buffers and additional key watershed designations are necessary to protect salmon runs and water quality.
- Bring back our beavers. Beavers are critical to watershed health and are missing from much of their historic range. The Northwest Forest Plan amendments offer an exciting opportunity to help restore beaver populations and the benefits they provide.

Thank you for this opportunity to provide comments on the Forest Service's proposed climate-smart amendment to the Northwest Forest Plan. The Northwest Forest Plan is critical to the health of our ecosystems and communities, and any amendments must maintain and strengthen its ecosystem-based conservation goals. I urge the Forest Service to use a transparent, science-based approach that reflects public values, Tribal perspectives, and the needs of future generations.

Thank you for your consideration of my comments. Please do NOT add my name to your mailing list. I will learn about future developments on this issue from other sources.

Sincerely,
Christopher Lish
San Rafael, CA