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February 1, 2024

Elizabeth Berger
Regional Forester
US Forest Service
1220 SW 3rd Avenue
Portland, OR 97204

RE: *Regions 5 and 6; California, Oregon and Washington; Forest Plan Amendment for Planning and Management of Northwest Forests Within the Range of the Northern Spotted Owl*

Dear Ms. Berger:

The Pilchuck Audubon Society in Washington State covers Snohomish County and Camano Island (part of Island County) in the Puget Sound lowlands. We have approximately 1500 members. Skagit Audubon Society's almost 500 members live in or near Skagit County. The Mount Baker-Snoqualmie National Forest includes large areas in both our counties. Our comments pertain to the Northwest Forest Plan Amendment (NWFP).

We earlier commented on the *Draft Barred Owl Management Strategy and Draft Environmental Impact Statement*; Docket No. FWS-R1-ES-2022-0074. While that was to inform the US Fish and Wildlife Service, the purpose and necessity of it is integral to the NWFP Amendment.

We are pleased that at long last attention has returned to the recovery of the Northern Spotted Owl (NSO), which more than ever is headed for extinction. Other plants and animals have in the intervening years since 1994 come to the attention of land managers and natural scientists as new potential and actual candidates for extirpation due to management decisions and perhaps climate change.

As noted in the Amendment language, "... changed ecological and social conditions, "are challenging the effectiveness of the NWFP." The listings referenced many times in the document are on the mark. No doubt you could have included more.

Although we may differ a bit on the details, we agree that your “Amendment Focus Areas” are of central importance in amending the NWFP. For the record, here is your preliminary list of these areas:

- Improving fire resistance and resilience across the NWFP planning area;
- Strengthening the capacity of NWFP ecosystems to adapt to the ongoing effects of climate change;
- 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;
- Incorporating Indigenous Knowledge into planning, project design, and implementation to achieve forest management goals and meet the agency’s general trust responsibilities, and
- 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.

Fire resistance and climate resilience: Climates are changing here in the Pacific Northwest federal forests as well as in those privately or otherwise publicly owned. Of special importance are the federal forests, where the Old-Growth Amendment is more vital than ever as acres of mature and old-growth forest decline on both the “wetside” and the dryside” of the Cascades, the Sierra, and the coastal ranges in all three states.

It is especially important to adapt the NWFP landscape to “enhanced fire resilience and climate change adaptability...” We support the goal in your statement that, “the Forest Service seeks additional plan direction that improves managers’ ability to mitigate the risks of wildfire to communities including tribes and (to) natural resources by supporting the functional role that fire plays in the ecological integrity of forests within the NWFP area”

This effort must include road decommissioning wherever possible, as most human-caused wildfires are started on or near roads. Logging is only effective for fire prevention when performed in the urban-wildland interface. Large fires that impact nesting and roosting habitat are a concern for the NSO. However, habitat removal through logging to prevent fires can result in the same impact.

According to Lesmeister, “Converting older, closed-canopy forests that function as fire refugia to more open, managed forests does not assure a dampening effect on wildfire severity, due to the complex changes in the microclimate of forest stands after thinning.”¹ Thinning can lead to drying of the understory and heightened susceptibility to fire.

As Audubon Society chapters in western Washington, moist forests are our home. We see in California and Oregon the too-long trend in the past 30 years of mounting losses of mature and old-growth ecosystems to wildfire. This applies to both wet and dry forests and has included damage to entire adjacent communities. It is our hope that your new post-wildfire silvicultural direction will guide reforestation and restoration of burned watersheds everywhere and improve safety for nearby residents.

¹ Lesmeister, Damon B., et al. “Northern spotted owl nesting forests as fire refugia: A 30-year synthesis of large wildfires.” *Fire Ecology* 17.1.(2021):32

Climate Change: Drought conditions are trending upward on both sides of our Cascades and elsewhere in the NWFP area. There are similarities between wet and dry forests which you note in your scoping summary, reminding us that climate change is shifting the distribution of forest types, plant and animal communities, and fire regimes throughout the NWFP area.

To this objective of addressing climate change the Forest Service should add the goal of using forests to store carbon over long periods. Mature forests in particular have been proposed as climate refugia because their anticipated refugia properties are far superior to those of logged areas.

Mature and Old Growth Ecosystems: We have long been mindful that protecting and fostering the biodiversity of mature and old growth ecosystems are all important in the PNW moist forests. It is heartening to see agreement in your documents. However, in the Draft Environmental Impact Statement (DEIS) we ask that you consider whether the current small system of reserves and the “leave tree requirements” are sufficient for long-term preservation of this biodiversity.

We would like to eliminate options in the current NWFP that allow commercial logging in Late Successional and Riparian Reserves. That includes post-fire logging in both reserves. With some past timber sales it seems the stated objective of improving old growth habitat is in fact secondary to providing a financial incentive by making available large, marketable trees to attract buyers. We strongly question that practice.

We support the continued use of the “reserve” concept as a central organizing principle in the amended NWFP. As part of adjusting the plan to better address the effects of climate change, we urge that the Old-Growth, Late Successional, and Riparian Reserves be increased in size and number to better support connectivity for both wildlife and plants. There is increasing awareness of connectivity’s importance in providing for the changing ranges of both plants and animals affected by climatic change.

We support full retention of the NWFP’s highly successful Aquatic Conservation Strategy. In fact, it should be strengthened by prohibiting all commercial timber harvest within Riparian Reserves and increasing restrictions on road building.

We recognize that the Survey and Manage Program, an integral part of the original NWFP, has been little used in recent years. We request that the DEIS for the plan Amendment analyze why this is so and describe how the program can be improved and better implemented.

We urge the Forest Service to commit to a transparent and scientifically rigorous process to determine species of conservation concern and to a robust monitoring program to ensure long-term species viability. We request that you indicate if this has not been done in the past for want of funding. Conservation groups can be helpful in communicating with elected leaders in such situations.

It is our hope that your following statement will be supported by more rigorous funding and management:

“New plan direction would improve conservation and recruitment of mature and old growth forest conditions and associated habitat for NSO and other vulnerable species in moist forest settings.”

We suggest you replace “would” with “will” in that sentence.

This point is supported by a statement in the *Supplemental Report to the Bioregional Assessment of Northwest Forests March 2021*², concerning the continued importance of protecting habitat for the Northern Spotted Owl and the need to increase its extent:

“In light of the additional impact on northern spotted owls from barred owls, there is an amplified need to continue to promote and conserve northern spotted owl habitat and increase treatment of currently unsuitable habitats to accelerate the attainment of suitable nesting/roosting habitat, while at the same time cooperatively addressing the barred owl threat.”

We urge that one or more alternatives in the DEIS call for working towards statutory protection for areas within the NWFP forests currently administratively protected under the Roadless Rule.

Tribal Inclusion: We note your frank and accurate statement that in the 1994 development and subsequent implementation of the NWFP the Forest Service, “could have involved more consultation, engagement, and partnership with tribes and the inclusion of ecological and traditional ecological knowledge.”

Your own words in this document pledge this time to honor Tribal sovereignty and to accurately address treaty rights. The appointments to the Federal Advisory Group of Tribal representatives are a good start. Including Tribes as partners in forest management will support sound and wise management decisions.

Communities: At the inception of the so-called “Clinton Forest Plan” in 1993 and the Judge Dwyer decision soon after, there was emphasis outside the Forest Service on socio-economic transitions from a timber based economy. The US Department of Labor and other agencies participated along with some state agencies.

It was a crushing blow to many timber-dependent communities when the realities of vanishing mature and old-growth forest on both private and public forest lands hit home here in the 1990s. It was difficult for many to accept, and some still have not, that this vegetative cover had largely vanished before anyone had ever heard of a “Northern Spotted Owl.” Companies had been packing up and leaving the Pacific Northwest since the late 1960s after depleting their own old-growth properties and converting the land to residential developments and commercial real estate.

But our society’s need for timber and non-timber products continues. Over the past 30 or so years, there have emerged companies with new technologies for processing small diameter trees, producing products new and old. These companies are arising in place or have come from elsewhere to contribute to a new and evolving timber economy in the Pacific Northwest.

Some places have adjusted well, while others have experienced considerable pain and sorrow at the demise of a way of life. Your frankness is welcomed in acknowledging that the, “...NWFP has largely not achieved its timber production goals, which were the NWFP’s primary criteria for supporting economies and community well-being (e.g. livelihoods and subsistence practices).”

It is our hope that any new timber production targets you choose will be achievable but not at the expense of your five listed Amendment Focus Areas goals.

² *Supplemental Report to the Bioregional Assessment of Northwest Forests March 2021*, p.137 (PDF p.149)

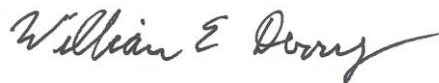
We hope that your DEIS will provide substantive recommendations for addressing the lingering pain of affected communities and will accurately assess potential timber production goals.

Your summary indicates that the Forest Service may be willing to reduce its emphasis on logging in favor of other economic opportunities. Tourism and low-impact outdoor recreation are highly undervalued and poorly supported by Forest Service expenditures. Over the years this has seemed due to Presidents and Congresses being unwilling to adopt supportive policies and provide larger appropriations. There have been recent positive steps when large sums were appropriated to the National Park Service and larger-than-usual funding to the Forest Service, but more needs to be done.

Projects in ecosystem services such as ensuring clean air and water, flood and landslide prevention, and fish and wildlife habitat recovery also provide economic opportunities. True restoration - including road decommissioning, replanting native species, removing invasive plants, drainage improvements and river enhancement - requires skills utilized in logging work and can provide excellent employment opportunities for displaced timber workers. Economic analysis must include these considerations.

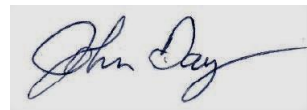
We appreciate your undertaking this unusually challenging scoping process. It is broader, deeper, and more complex than any in which we have previously participated. An amended Northwest Forest Plan promises better times for our national forests and greater success in protecting their older stands and biodiversity. We look forward to seeing other comments, your responses, and the subsequent DEIS.

Sincerely,



William E. Derry, President
Pilchuck Audubon Society

Sincerely,



John Day, President
Skagit Audubon Society