

Ms. Jacque Buchanan, Regional Forester
Pacific Northwest Region
United States Forest Service
1220 SW 3rd Avenue
Portland, OR. 97204

Submitted via webportal: <https://cara.fs2c.usda.gov/Public//CommentInput?Project=64745>

Dear Ms. Buchanan,

On behalf of the North Central Washington Forest Health Collaborative (NCWFHC) Steering Committee we thank you for this opportunity to provide scoping comments in response to the Forest Service's notice of intent to prepare an environmental impact statement for the amendment for planning and management of northwest forests within the range of the northern spotted owl (Northwest Forest Plan [NWFP] amendment). The NCWFHC supports the efforts to amend the NWFP and offers these comments to inform the process.

The NCWFHC is a diverse group of stakeholders, including the timber industry, conservation groups, tribal government, local businesses, elected officials, and local and state governments working together to obtain resources and community support to accelerate landscape-scale forest restoration on the Okanogan-Wenatchee National Forest (OWNF) in Chelan and Okanogan Counties of Washington State. Decisions among NCWFHC members are consensus-based. We have 22 member organizations who have worked together for over 10 years with agreements to support the Okanogan-Wenatchee Forest Restoration Strategy (FRS)¹, increase the pace and scale of landscape-scale forest restoration, and focus on innovative solutions to the problems our forests and forest-proximate communities face today. Notably, the FRS focuses on desired restoration outcomes and measurable successes to restore forest patterns, processes, and functions to increase resilience to climate change and disturbances, all while working collaboratively and strategically across landscapes. We also know that this work cannot be accomplished without an economically sustainable timber industry that relies on the byproduct of forest restoration and supports our local economy in the region.

The forests and communities in the Chelan and Okanogan counties face unique challenges. While portions of our forest cover wet and cold forest types, most of the forest is dry and adapted to high-frequency, low-severity wildfires. The complexity of forests has made managing for late-successional species a challenging task. The area historically supported larger and older trees and contains a unique suite of endemic, rare, and endangered fish and wildlife. Like many other forests, climate change, historic logging practices, and wildfire suppression have resulted in forests that are characteristically dense with high fuel-loading levels. As a result, these dry forests are experiencing uncharacteristic fires at a larger scale and greater severity than historically occurred and loss of mature and old-growth forests and their ecosystems. Additionally, many communities in the region are some of the most at-risk communities for catastrophic wildfire.

The OOWNF currently must do project-level amendments to the NWFP because current science is different than NWFP direction. This takes extensive time and extended processes in internal and external consultation with other agencies. These challenges have resulted in losing our ability to

¹ Details on the Forest Restoration Strategy are found on the OOWNF website:
<https://www.fs.usda.gov/detail/okawen/landmanagement/planning/?cid=stelprdb5335689>

increase restoration pace and scale. In addition, the result of these challenges is a significantly lower and unpredictable wood supply that has caused a loss of adequate forest products infrastructure needed for forest restoration. The byproduct of forest restoration helps pay for so much good restoration work. Over 70% of the land base of Okanogan and Chelan counties is National Forest land, which is to say, what happens on National Forest land deeply impacts our communities.

We support the need for change focused on the five interrelated topic areas below:

1. Improving fire resistance and resilience across the NWFP planning area;
2. Strengthening the capacity of NWFP ecosystems to adapt to the ongoing effects of climate change;
3. 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;
4. Incorporating Indigenous knowledge into planning, project design, and implementation to achieve forest management goals and meet the agency's general trust responsibilities; and
5. 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 also support the proposed action in the NOI, which includes establishing new or modifying existing plan components, better enabling the agency to meet the original intent of the NWFP to conserve mature and old-growth ecosystems and habitat for the northern spotted owl and other species, protect riparian areas and waters, and provide a sustainable supply of timber and non-timber forest products; and incorporate new information relevant to the NWFP.

WILDFIRE RESISTANCE AND RESILIENCE

We are fully supportive of the need for change for wildfire resilience. Due to past management practices, wildfire suppression, and climate change, our forests on the OWNF are at risk of uncharacteristic wildfire. Uncharacteristic and uncontrolled fires threaten the remaining habitat of endangered species and threaten local human populations' physical, social, and economic health. We support management actions to increase wildfire resilience through landscape-scale ecological forest restoration, such as prescribed burning, managed wildfire, fuel reduction, and forest thinning.

We have experienced a consistent pattern of large-scale fires occurring ahead of project decisions in our high-priority project landscapes, requiring our collaborative to revisit impacts within the National Environmental Policy Act analysis. We recognize that this pattern demonstrates that where we anticipate the highest risk watersheds is accurate, but we are struggling to get to a NEPA decision before the fire occurrences. Additionally, we have complications beyond policy and planning such as implementing prescribed burns and planning in accordance with state and federal air quality standards.

CLIMATE CHANGE

The OWNF has overstocked forests, a growing number of homes in the wildland-urban interface, and unprecedented wildfire. The NWFP has limited the scale and treatment methods which has further led to the wildfire and forest health crisis. A warming climate further exacerbates these crises.

MATURE AND OLD GROWTH FORESTS, HABITAT, AND BIODIVERSITY

The OWNF is a unique forest among the forests of the NWFP because of the diverse variety of forest types and respective wildfire regimes. The unique attributes challenge agencies to provide solutions for multiple species of organisms while increasing the pace and scale of restoration. Wildlife and forest managers need a wide variety of tools and a clear set of guidelines to help maintain and restore the diverse habitats of the OWNF.

In the dry forest of OWNF, the Forest Service should utilize dry forest restoration and management, such as commercial harvest, non-commercial harvest, prescribed burning, etc., as detailed in Franklin & Johnson (2012)², approaches to conserve old trees and restore species composition and stand function. We support commercial and non-commercial harvest of younger trees and the reintroduction of fire to conserve mature and old trees.

Static reserves in our dry forests may not make sense. In the ever-changing, shaped by disturbance dry forests, static reserves may compromise the ecological integrity of these stands and the larger dry forest landscape in which they are embedded.

The FRS along with the most up-to-date science is a good blueprint for terrestrial restoration to consider integrating into the NWFP to help guide landscape-scale restoration across all lands on the OWNF for multiple species.

In frequent fire forests within the OWNF, managers need standards and guidelines different from those applied to moist or cold forests.

INCORPORATING TRIBAL KNOWLEDGE

We support the need for change for tribal inclusion in the form of rightful consultation with all affected tribes. Tribal perspectives on issues like aquatics, culturally sensitive species, access, and general traditional ecological knowledge cannot be ignored, as was done at the inception of the NWFP. The NWFP should include acknowledgment of the need for culturally prescribed fire, which has different goals than standard prescribed burns, often focusing on the benefits of first foods. We know that the Forest Service has recently sought to define tribes as co-stewards of natural resources in the forest. Full tribal inclusion would require that tribes be defined as co-managers.

We also need to acknowledge that the Forest's riparian areas, aquatics, and fisheries have suffered, like the health of the terrestrial species and landscapes. Poor forest health and wildfires have impacted

² Franklin, J. and Johnson, K.N., A Restoration Framework for Federal Forests in the Pacific Northwest, J. For. 110(8):429-439 (2012), <http://dx.doi.org/10.5849/jof.10-006>.

water quality, quantity, and fish habitat. We need a new focus on the aquatics in the NWFP update to address the issues we have on the OWNF.

PREDICTABLE TIMBER SUPPLY, NON-TIMBER PRODUCTS, AND OTHER ECONOMIC OPPORTUNITIES TO SUPPORT LONG-TERM COMMUNITY SUSTAINABILITY

The NWFP has largely not achieved its promise of supporting economies and community well-being, most of which was meant to be accomplished through the provision of predictable timber and non-timber resources from National Forest System (NFS) lands.

Our region lacks adequate timber industry infrastructure, making the economics of forest restoration challenging. Simply put, we can't accomplish landscape-scale restoration in the current economic climate if the by-product of forest restoration, revenue from selling timber, doesn't exist. And with over 70% of the land base in the region under Forest Service ownership, we can't bring the timber industry back to the region without commercial harvest being done on NFS lands.

Social Equity

Poor forest health and its effects disproportionately affect rural, poor, minority, tribal, and low-income residents. Up-to-date and evolving science must also consider these factors and broad considerations outside of historically limited landscape modeling. Executive Order (E.O.) 12898 directs federal agencies to identify and address their actions' disproportionately high and adverse human health or environmental effects on minority and low-income populations to the greatest extent practicable and permitted by law.

On the plus side, the original NWFP includes a goal to build up a workforce to complete this work. The agency should invest in making it easier for rural communities to participate in this work. We can't get this work done without the people. We need to make jobs accessible for small rural contractors to complete this work. Consistent work is imperative to develop and maintain the infrastructure and workforce to complete forest restoration. The process moves faster when you have a streamlined process, such as clear directions and guidelines. With the challenges we face, such as climate change and reduced wildfire resilience, it's imperative we move faster to restore our forests at a pace and scale commensurate with the problem.

AQUATICS

We are disappointed that aquatics was not one of the major need for change topics, and we recommend that aquatics be added as a standalone topic. Although the current NWFP includes an Aquatic Conservation Strategy, the effectiveness of that strategy is suspect, given the widespread lack of high-functioning instream habitat on the OWNF. We also want to clarify that the FRS is unsuitable for aquatic landscape restoration. It doesn't include details on in-stream habitat or wetland habitat or how to restore them. Additionally, within the FRS there is not a large focus on wetland habitat, non-fish bearing streams, and streams above anadromy.

Interpretation of the NWFP and how it is implemented is a challenge. Why do we need to ask for variances within the Late Successional Reserves (LSR)? We recommend variances be less of an obstacle

and instead utilize adaptive management and place-based management, especially with the added use of new tools and current science.

CONCLUSION

Again, we are grateful for the opportunity to engage in the NWFP amendment process. We look forward to continuing our engagement and learning more about the proposed action in the draft EIS later this year.

Sincerely,

Chris Branch/Okanogan County
NCWFHC Co-Chair

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NCWFHC Co-Chair