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United States Forest Service
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*Submitted via web-portal:* https://cara.fs2c.usda.gov/Public//CommentInput?Project=64745

RE: Northwest Forest Plan Amendment Scoping Comments

Dear Ms. Buchanan and Ms. Eberlien,

On behalf of Trout Unlimited (TU) and our 300,000 members and supporters across the country, we thank you for this opportunity to provide scoping comments in response to the U.S. Forest Service (USFS) notice of intent to prepare an environmental impact statement for the Amendment of the Northwest Forest Plan (NWFP).

TU is the largest organization dedicated to the conservation, protection, and restoration of our nation's coldwater fish populations and their watersheds, and our mission is to bring together diverse interests to care for and recover rivers and streams so our children can experience the joy of wild and native trout and salmon. We fundamentally believe the realization of our mission hinges upon strong partnerships with our public land managers, including the USFS. TU has a longstanding and robust relationship with the USFS nationwide, rooted in deep collaboration with USFS staff to achieve significant on-the-ground project successes across nine USFS Regions. This strong TU-USFS partnership was highlighted by the inking of a groundbreaking $40 million National Keystone Agreement in 2023.

Throughout the NWFP area, TU works closely with USFS staff at the Region, Forest, and District levels to maximize our collective impact for native fish populations through project planning and implementation – completing hundreds of projects (and counting) across Washington, Oregon, and California. These projects include fish passage, habitat restoration, instream flow enhancement, floodplain reconnection, beaver reintroduction, and many other project types. TU has a vested interest in ensuring these meaningful collaborations with the USFS continue to grow and our beloved native fish continue to flourish on our nation's National Forests for generations to come.

TU sees the upcoming NWFP Amendment as a once-in-a-generation opportunity to hone the collective strategy for managing our precious National Forest landscapes and the species on which they depend to improve their resilience to climate change and other existential threats. Scientific and social developments in the areas of climate change, habitat restoration, aquatic ecosystem ecology, Tribal leadership, and forest health have evolved significantly over the last 30 years, and we feel it is of paramount importance to update the NWFP accordingly.

We have organized our comments into the following interrelated themes: Climate Change Resilience and Biodiversity; Aquatic Conservation Strategy; Incorporating Tribal Knowledge and Participation; Community Relationships; Invasive Species; and Monitoring and Adaptive Management.

## CLIMATE CHANGE RESILIENCE AND BIODIVERSITY

Native fish species in the NWFP area, including ESA-listed salmon and trout, require cold clean water and intact, high functioning watersheds for their survival. Climate change poses serious threats to native fish and other aquatic species, as well as overall ecological diversity, which were not contemplated in the 1994 NWFP. For example, warmer temperatures will result in more precipitation falling as rain instead of snow at high elevations, a substantial decline in mountain snowpack, an earlier snowmelt season, and decreases in summer streamflow, which elevates water temperatures and negatively impacts native fish and other aquatic species. Climate change-driven catastrophic fires threaten the integrity of riparian zones fish depend on for shade to moderate water temperatures, sediment filtration, large wood recruitment, and food web contributions. TU offers the following recommendations for the NWFP Amendment to improve watershed health and resilience in the context of the increasing threat of climate change.

- Explicitly acknowledge climate change effects and the need for adaptation measures and develop plan components to consider climate change vulnerability and adaptation in planning and implementation of treatments and other management and climate response/mitigation. This should include development of science-based "desired conditions" to provide land managers with necessary direction, flexibility, discretion and clear decision-making processes and actions to respond to both the projected impacts and the high degree of uncertainty that climate change brings to maintain social and ecological resilience, functional ecosystems, watersheds and component habitats. In addition, the NWFP Amendment should include direction for the identification and development of specific thresholds for future climate driven changes to forest conditions across the NWFP area which would trigger reevaluation and possible Amendment of plan components. Amend the monitoring framework to define and operationalize "triggers" for adaptive management.

- Integrate new research and development of climate change resilience strategies, including using low-tech process-based restoration and beaver restoration/reintroduction to improve to floodplain connectivity, buffer flooding impacts, and increase late season instream flows in dry watersheds. Beaver restoration is a rapidly growing restoration approach and applied science, which has shown to dramatically increase groundwater recharge and water retention, thereby improving watershed resilience to wildfire effects and improving fish habitat. TU encourages the USFS to designate beaver as a "focal" species in the NWFP and to work with Tribes, state resources management agencies, and NGOs to promote these restoration strategies and protect beaver on National Forest lands.

- TU understands the dire need for forest restoration region-wide to improve forest resilience, with many USFS lands at risk of catastrophic wildfires due to overstocking, insect and disease outbreaks, and decades of mismanagement exacerbated by climate change. TU supports science-based approaches to improving forest health and resilience (e.g., Franklin & Johnson 2012), including selective tree harvest and fuel reduction based on landscape evaluation/landscape prescriptions; retention of the largest, oldest, healthiest trees; strategic use of prescribed fire; and aquatic restoration treatments that improve habitat connectivity, watershed hydrology, and fish passage. We urge the USFS to amend the NWFP to institutionalize application of the latest science for landscape evaluations and prescriptions and re-evaluate the appropriateness of static reserves in a changing climate, particularly in dry forest types.

- While TU support forest health restoration and acknowledges the clear and present danger of catastrophic wildfires, we urge the USFS to ensure urgency-driven planning and implementation of USFS National Wildfire Crisis Strategy priorities do not supersede NWFP elements meant to protect riparian and aquatic functions. For example, shaded fuel breaks in riparian areas adjacent to ESA-designated Critical Habitat should not be allowed by Categorical Exclusion (or at all unless there is a direct and proven risk to adjacent communities), and forest treatments should instead be dictated by

landscape prescriptions driven by a landscape analysis, as there is no scientific evidence that indicates shaded fuel breaks provide greater efficacy than implementation of landscape prescriptions to protect against extreme wildfire behavior. Our ESA-listed salmonids face the clear and present danger of "death by a thousand cuts" and risk of extinction of some populations is very real in our lifetime – we should be extremely cautious and calculated when considering thinning in riparian zones and avoid heavy thinning and removal of large and old trees at all costs, as the integrity of these systems is essential for supporting our native fish.

- Develop a plan for research, monitoring, and planning to identify and maintain climate refugia networks and connectivity corridors for sensitive fish species. These areas should be mapped, protected and prioritized for restoration treatments, particularly in dry forest types. They should provide accommodation for adaptive capacity in planning and real-time decision making around habitat restoration and climate resilience. Plan components should give land managers the ability to direct management of forests to respond to climate threats in real time and enhance their ability to provide connected refugia, migration corridors, and facilitate assisted migration when appropriate.

## AQUATIC CONSERVATION STRATEGY

TU feels it is critical to ensure any Amendment to the NWFP increases protection and restoration opportunities for aquatic habitats and safeguards existing standards contained in the NWFP Aquatic Conservation Strategy (ACS). The recommendations provided below include the caveat that TU would not be supportive of opening the ACS to Amendment if there is a risk of compromising the integrity of existing safeguards and direction for managing aquatic habitats.

- Adopt principles put forward in the USFS 2018 Aquatic Riparian Conservation Strategy (PNW and PSW regions), such as applying new science and employing a landscape approach to aquatic habitat conservation that focuses on protection and restoration of the natural processes that create and maintain habitats at multiple scales.

- Consider and evaluate the potential efficacy of amending Riparian Reserves to allow for case-by-case selective tree thinning for catastrophic wildfire risk reduction, if safeguards can be put into place to protect riparian functions, including maintaining integrity of sensitive soils; maintaining adequate stream shading; increasing LWD recruitment potential; retention of large and old trees; among other requirements.

- Integrate principles to facilitate the reduction of road densities and stream crossings and increase grazing-related protections, particularly in areas with sensitive aquatic resources (e.g., ESA listed salmon and trout; high quality wetlands, etc.).

- Develop a standardized approach for conducting Aquatic Landscape Evaluations, analogous to terrestrial Landscape Evaluations, which can be incorporated NEPA processes for landscape-scale restoration projects. TU sees the critical need for updating and standardizing the evaluation of aquatic habitat condition and ecological processes and identifying and prioritizing aquatic habitat restoration opportunities as part of NEPA analyses, the lack of which is in direct contrast to scientifically robust, standardized approaches for conducting terrestrial landscape evaluations and developing landscape prescriptions (e.g., the Okanogan-Wenatchee National Forest's Forest Restoration Strategy 2012).

## INCORPORATING TRIBAL KNOWLEDGE AND PARTICIPATION

TU feels the NWFP Amendment should include direction for the incorporation of Tribal knowledge and voices into policies, planning, project design, and implementation to achieve forest management goals and meet the agency's general trust responsibilities. We support the need for Tribal inclusion in the form of rightful consultation with all affected Tribes, as well as integration of Tribal perspectives into habitat restoration, management of culturally sensitive species, prescribed fire, access, general traditional ecological knowledge, and other topics.

Tribal communities are on the front lines of climate change, both in experiencing significant impacts of climate stressors and as leaders in climate change monitoring, planning, and adaptation. Tribes should therefore have a significant role in planning, monitoring, and decision-making regarding climate change adaptation processes for forests across the planning area. Amendments to address climate change must incorporate Indigenous science and stewardship practices and be responsive to the needs and values of Indigenous communities throughout the NWFP area.

## COMMUNITY RELATIONSHIPS

As a longstanding partner with the USFS, TU supports NWFP Amendment aspects that would bolster and streamline community partnerships for project planning and implementation. We also encourage the development of enhanced community engagement and public relations approaches beyond what is required by NEPA, including predictable, regular community engagement activities at the Forest and District level, such as open houses, townhalls, and community field tours.

From TU's perspective, USFS staff turnover may be the single biggest roadblock to increasing the pace and scale of habitat restoration on National Forest lands; successful implementation of projects hinges on trust-based relationships among USFS staff, partners, and the community, which are thwarted by the constant revolving-door we witness with USFS staff. TU recommends the implementation of policies to reduce turnover and the frequency of moves, including the recommendations developed by the 2012 Planning Rule FACA Committee. TU also supports hiring a local workforce for project implementation to help revitalize local rural economies and build community trust.

## INVASIVE SPECIES

Climate change is driving significant changes in aquatic ecosystem conditions across the NWFP area, such as water temperature, precipitation levels and timing, and snow levels. This in turn has a dramatic impact on the range of suitable habitat for invasive species and their subsequent distribution and effects on native species. It is critical for the NWFP Amendment to integrate new research related to invasive species detection, management, and monitoring and include direction for nimble response based on changing conditions over time.

## MONITORING AND ADAPTIVE MANAGEMENT

TU believes monitoring and adaptive management are essential for achieving NWFP objectives, ensuring successful implementation of projects, and building and maintaining community trust. We suggest the NWFP Amendment include processes for developing and codifying monitoring frameworks for both implementation monitoring and effectiveness monitoring, as well as adaptive management triggers and procedures. This is especially important in areas providing habitat for Federal and State listed Threatened and Endangered species, Species of Conservation Concern, and Tribal-identified cultural use species. In the event USFS opts not to revise the ACS as part of this Amendment process, there remains an opportunity to meaningfully refine the Plan with regard to stewardship of aquatic and riparian resources by improving the monitoring and adaptive management framework. TU recommends the NWFP Amendment include direction for the development of

collaborative monitoring frameworks, whereby the USFS partners with Tribes, state and local agencies, local communities, NGOs, academia, and other partners on monitoring efforts to ensure projects achieve their intended outcomes. The NWFP amendment should include direction for funding monitoring and adaptive management to ensure adequate resources are available to complete this important work.

In summary, TU is excited about this once-in-a-generation opportunity to update and improve the NWFP, and we will look forward to engaging throughout the NWFP Amendment process moving forward. Thank you for your consideration of these comments.

Sincerely,


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