Northwest Forest Plan Revision Principles

The undersigned conservation organizations would like to follow up on a recent meeting with Forest Service regional foresters Randy Moore and Jim Peña and planning staff. Outlined below we express our concerns and offer a vision for the proposed revision to President Bill Clinton's Northwest Forest Plan (NWFP).

Our organizations are concerned by the proposed forest by forest revision process which lacks the overarching standards and guidelines of the NWFP, and past and current agency actions to weaken the NWFP, including the offering of projects inconsistent with conserving the Northwest's late-successional ecosystem and the birds, fish and other wildlife it sustains. We encourage the administration to consider a better course of action than the currently proposed NWFP revisions. We are confident one exists, and that it is consistent with the best available science and our collective efforts to combat climate change.

We urge the Obama Administration to keep the NWFP as a consistent, regional, interagency plan and continue the ecosystem management approach that accounts for the needs of multiple listed species which depend on the preservation and restoration of large blocks of mature and old-growth forests and intact watersheds that remain in short supply on the landscape. Recent science has reaffirmed the importance of the NWFP as a global model for ecosystem management and biodiversity conservation, particularly the reserve network[i]. We urge the administration to abide by the founding principles of the NWFP, particularly with respect to its emphasis on scientific credibility and legal defensibility as also outlined herein.

The NWFP is a success and an example of strong presidential leadership that provided the Northwest's old-growth forest ecosystem a needed breather from decades of intensive logging that all but eliminated a functional old forest ecosystem in the Pacific Northwest[ii] and the resulting national public controversy. Due to forest growth provided for by the NWFP, what was once a significant annual source of CO_2 due to logging of old forests is now a significant net carbon sink.[iii] Additionally, water quality has significantly improved due to the plan's watershed restoration emphasis and constraints on logging in riparian buffers[iv].

The NWFP as implemented (i.e., emphasizing commercial thinning in young plantations and de-emphasizing regeneration harvest (e.g. clearcutting) and preservation of mature and old growth forests) remains a solid foundation upon which to build and offers the best model to address numerous new stressors to this late-successional ecosystem. For example, radio-tracking studies demonstrate that Northern Spotted Owls have a higher likelihood of survival against Barred Owl invasion when larger blocks of late successional habitat are available[v].

Based upon the latest information about wildlife population declines, the influx of the Barred Owl, rising carbon dioxide levels in the atmosphere and the likely impacts of climate change, additional protective measures for wildlife habitat, preservation of high biomass forests, and increased protection of stream buffers should be implemented by this plan revision.

We recommend that plan revisions build on the protective standards and guidelines and reserve allocations of the NWFP by incorporating new policy recommendations such as ecological integrity (as specified in the 2012 planning rule), climate resilience, connectivity, and especially carbon storage (as specified by the Council on Climate Preparedness and Resilience Climate and Natural Resources Working Group). Below are the following principles we believe are consistent with these new policies and best science.

Strengthening and Expanding Reserves

- Expand the late successional reserve and riparian reserve systems to provide refugia for late-successional species and to ameliorate new stressors, including Barred Owls and climate change.

- Prohibit post-disturbance logging in reserves to protect carbon sequestration of post-fire landscapes, provide habitat for threatened species and prey, and to provide complex early seral forests that are as rich as old-growth forests[vi] and increasingly rare due to post-fire logging.

- Designate additional reserves and larger no-logging buffers within the range of the threatened Marbled Murrelet to reduce habitat fragmentation effects.

- Designate all mature and old-growth forest, all high-carbon forests, all reserves, all critical habitat, all key watersheds, and all roadless areas larger than 1,000 acres, as “not suitable for timber production” to ensure that timber production does not take priority over ecological and restoration goals.

- Withdraw reserves and all administratively protected classifications from mining.

Protecting Watersheds, Aquatic Species

- Retain existing Aquatic Conservation Strategy (ACS) objectives and riparian reserve boundaries, and the standards and guidelines that emphasize restoration, and avoid actions that would retard or prevent achievement of the ACS objectives for all watersheds, over time.

- Preserve requirements that projects maintain and restore the aquatic functions and processes of streams and watersheds by demonstrating consistency with the nine Aquatic Conservation Strategy Objectives at scales relevant to those functions and processes.

- Prohibit grazing in riparian reserves and key watersheds and provide for voluntary federal grazing permit vacation to reduce cumulative effects of grazing[vii].

Reducing Stressors by Addressing Roads

- Rationalize the road system by reducing road densities and road-related impacts to listed aquatic and terrestrial species, improving all standards for road decommissioning and removal, and restoring connections to inventoried roadless areas.

- Accelerate implementation of Travel Analysis Report recommendations and Watershed Restoration Action Plan projects to implement a minimum road system.

Advancing Forest Restoration

- Promote variable density thinning in plantations to accelerate development of late-seral conditions and reduce fire risks. Limit tree thinning to 20 inch dbh to restore older tree characteristics to dry and moist forests.

Protecting High Biomass Forest Carbon Stores and Reducing CO_2 Emissions

- Conduct baseline inventory of carbon stocks and fluxes to identify and protect all high biomass forests[viii] for their carbon storage value.

- Analyze and mitigate for carbon dioxide emissions resulting from regeneration logging, forest thinning, post-fire logging, and biomass utilization[ix].

Re-Establishing Connectivity

- Establish and protect redundant habitat linkages for wolves and other wildlife along elevation gradients and north-south gradients and microrefugia (mainly low elevation and north-facing mature forests) for species movements and persistence in a changing climate[x].

- Protect all native (unmanaged) forest in all land allocations from logging to add connectivity and increased functionality of late-seral ecosystem needed to arrest declines in listed salmon populations and late-seral species such as Northern Spotted Owl, Marbled Murrelet, Pacific Fisher, Humboldt marten, and Red-tree Vole.

Protecting Drinking Water Sources

- Protect drinking water source areas for municipal water supplies from degrading activities including commercial logging, grazing, mining and off-road vehicle use.

Recommending Wilderness, Wild and Scenic and other Protected Areas

- Recommend new Wilderness Areas and Wild and Scenic Rivers, including tributary additions to existing Wild and Scenic Rivers.

- Complete the Research Natural Area System, designate additional Special Interest Areas and designate and protect National Recreational Trails.

Allowing for Appropriate Wildland Fire Management

- When appropriate, allow fires to burn safely in the backcountry and provide for un-salvaged early seral habitat for fire-dependent species. Focus thinning on the home ignition zone and flammable tree plantations.

Conversely, conservation groups are opposed to dissolution of the regionally integrated NWFP with each National Forest and BLM District Office adopting inconsistent and weaker standards that do not take a comprehensive ecosystem protection and restoration approach. Judge William Dwyer concluded that the BLM and Forest Service had to do an ecosystem-wide plan as opposed to forest-by-forest plans and ruled that the agencies could not, given the current conditions of the forests, meet their obligations under NEPA and the ESA "without planning on an ecosystem basis." *Seattle Audubon Society v. Lyons,* 871 F. Supp. 1291, 1311 (W.D. Wash. 1994) (emphasis in original).

The best available science does not support eliminating or shrinking the late-successional or riparian reserves or weakening of other protective management standards. As noted above, scientific studies indicate that Northern Spotted Owls have a better chance of coexisting with Barred Owls when there are more large blocks of habitat available. Logging in suitable or high quality Critical Habitat of the Northern Spotted Owl is inconsistent with recommendations to preserve existing habitat, and should be avoided. Clearcuts, including modified clearcuts (ecoforestry) on federal forests will hasten owl decline[xi] and degrade water quality and should therefore be opposed.

Past and recent agency actions to weaken protections of the Northwest Forest Plan and to offer extensive post-fire timber sales and other projects in the NWFP region that are inconsistent with the best available science or current understandings of climate adaptation and resilience have eroded public and scientific trust. We are greatly concerned the land management agencies are leading NWFP revision process in what appears to be a piecemeal and uncoordinated fashion. Specifically, we are concerned by:

- The BLM's Western Oregon Plan Revision and the Okanogan/Wenatchee National Forest draft plan revision that propose to eliminate or reduce reserves and weaken management standards in the Northwest Forest Plan.

- Proposals to replace the NWFP Aquatic Conservation Strategy with a modified Aquatic Conservation and Restoration Strategy that has weaker protection standards[xii], and to eliminate Survey and Manage Requirements.

- Large-scale post-fire logging in mature and old-growth forests and Key watersheds such as the proposed Westside post-fire logging project on the Klamath National Forest in California despite extensive science that indicates this type of logging is not consistent with ecological integrity or climate resilience[xiii].

- Raising the age of logging in late-successional reserves in California from 80 years to 120.

- Allowing for logging that downgrades or degrades suitable Northern Spotted Owl habitat in designated critical habitat.

- Not re-designating late-successional stands in the matrix as reserves or updating the current 800 million board foot Probably Sale Quantity to reflect the additional protections required by the Northern Spotted Owl critical habitat designation and the need to conserve forest carbon.

- Continuing to propose damaging logging despite lack of up to date regional population numbers for Northern Spotted Owl, Marbled Murrelet, Red Tree Vole, and Pacific fisher and the impact of these projects on these imperiled species.

- Lack of analysis of impact of large-scale thinning effects in Northern Spotted Owl and Marbled Murrelet critical habitat and suitable nesting, roosting and foraging owl habitat.

In conclusion, we urge the land management and wildlife protection agencies under your purview to address these specific recommendations listed above as part of the upcoming planning process and build upon the protections of the historic NWFP. This will ensure that the plan continues to be a leading example of large-landscape conservation and ecosystem restoration. Thank you for your consideration.

We look forward to working with the administration and federal agencies on the NWFP, and are interested in meeting with you at your convenience to discuss these issues in more detail.

Sincerely,

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