



State of Washington
DEPARTMENT OF FISH AND WILDLIFE

Mailing Address: PO Box 43200, Olympia, WA 98504-3200 · 360 902-2200 · TDD 360 902-2207
Main Office Location: Natural Resources Building, 1111 Washington Street, Olympia, WA

February 1, 2024

Submitted electronically.

RE: Northwest Forest Plan Amendment #64745 comments.

To Whom It May Concern

The Washington Department of Fish and Wildlife (WDFW) is pleased to provide the following comments and recommendations on the USDA Forest Service notice of intent to prepare an environmental impact statement for the proposed amendment to the 1994 Northwest Forest Plan (NWFP). WDFW has worked to steward Washington's fish and wildlife as public trust resources. Our mission is to preserve, protect, and perpetuate fish, wildlife, and ecosystems, while providing sustainable fish and wildlife recreational and commercial opportunities.

Although originally designed to cover the range of the northern spotted owl and California spotted owl, federal lands in Washington managed under the NWFP provide critical habitat for multiple species listed under the federal Endangered Species Act (ESA). In addition to northern spotted owl (NSO), listed species include Marbled murrelet, Canada lynx, salmon, steelhead, and bull trout.

In response to the amendment of the NWFP, WDFW has the following recommendations:

1. According to the Bioregional Assessment of Northwest Forests, "Adaptive management areas were designated in the NWFP but are rarely used, so goals associated with learning from adaptive management were not met" (Ch2 p26). In order to meet set goals, WDFW recommends that adaptive management be incorporated across the entirety of the NWFP, not just in designated management areas.
2. Review current land designations (matrix, LSR, RR, etc.) to determine if the designations and allowed activities are still applicable. Were the designations effective in achieving the desired outcome?
3. There is a need for shared stewardship and collaboration to be part of the NWFP. Habitats exist beyond property boundaries. It is important to collaborate with neighboring landowners on a landscape scale and make regional land management decisions.

In response to the four amendment focus areas, WDFW offers the following comments:

4. Fire Resistance and Climate Resilience: Adapting the NWFP landscape to enhanced fire resilience and climate change adaptability, leveraging recent data and predictive models.

- a. WDFW recommends evaluating fire resistance and climate resilience approaches that incorporate forest health alternatives that maintain habitat integrity and connectivity for wildlife across the landscape. Forest health treatments focused solely on thinning and fuels reduction can degrade wildlife habitat (e.g. lynx/hare).
 - b. WDFW recommends standardizing wildlife-related prescriptions for forest management and integrate them into all forest health treatment plans.
2. Mature and Old-Growth Forest Management: Revising strategies for the conservation and sustainable use of mature and old-growth forests considering recent ecological studies and long-term forest health metrics. Adding relevant NWFP Area guidance in support of the planned Old-Growth amendment to all National Forest System unit land management plans.
 - a. Concurrently the USFS is working on a National Mature and Old Growth Plan under executive order 14075. In the areas covered by the NWFP, these two efforts should be collaborative not duplicative.
 - b. WDFW recommends a greater emphasis on the need for a mosaic of forest stand conditions. The Amendment appropriately includes the need for improved older forest conditions in support of wildlife species that require this successional stage, such as spotted owls and marbled murrelets. However, the Amendment fails to place equal emphasis on the need for early seral habitats that support robust populations of species that thrive in younger stands such as elk, deer, and pollinators. There is also a need to manage for open areas that were historically maintained by higher fire frequencies.
 - c. In 2022 WDFW commented on the USFS request for information on federal old-growth and mature forests under Executive Order 14072. These comments were focused on the criteria for a definition framework to inventory mature and old growth forests. This past work, along with comments, should be incorporated into the NWFP amendment.
3. Community and Economic Considerations: Aligning timber and non-timber product -supply strategies with community needs, environmental justice principles, and Tribal collaboration, reflecting the socio-economic dynamics influenced by forest management.
 - a. One of the elements of the NWFP and the Amendment is to contribute to social and economic sustainability in the region. WDFW cautions against compromising critical habitat conditions for ESA listed species such as the northern spotted owl and marbled murrelet.
 - b. Forest health and wildlife habitat restoration are long-term endeavors. Cooperative funding can be allocated to establish programs that provide job opportunities to affected people where there is a reduction in timber production on federal lands. National forest lands are vast and there is a lot of work that needs to be done. Flipping the script from timber harvest to jobs focused on restoration and/or resilience might revitalize small communities that once relied on timber.
4. Wildlife Habitat Protections: Updating habitat management approaches within the NWFP framework to incorporate new findings on species interactions and habitat requirements, particularly in mature and old-growth ecosystems.
 - a. WDFW recommends including the western gray squirrel, as it was recently uplisted to state endangered by the Washington Fish and Wildlife Commission. Part of this inclusion should address managing for Oregon white oak habitats within national forests.

- b. WDFW recommends expanding the current focus for aquatic ecosystems beyond anadromous salmon. Most of the stream systems protected under the NWFP are headwater stream systems that do not have anadromous salmon and are used by amphibians and lamprey.
- c. WDFW recommends integration of habitat corridors into planning to ensure animal movement is not unintentionally disrupted through harvest or logging operations.
- d. The Northern spotted owl is listed federally as Threatened; however, in the 2020 and 2022 candidate notification of review (CNOR), the U.S. Fish and Wildlife Service (Service) concluded that uplisting the spotted owl from Threatened to Endangered was warranted. The Service did not take any new actions at the time because listing the species as endangered was precluded by higher priority actions. It is important for the NWFP amendment to acknowledge this status change to Endangered, especially where species status influences decisions.
- e. The NSO rates of decline are the most dramatic in Washington. The amendment should also consider the stark difference in the species status within individual states and be flexible (Franklin 2021). Threats to recovery will rank differently by location and it is unlikely that a one-size-fits all approach will be effective.
- f. Roads continue to be a significant environmental concern across the NWFP area. Elevated amounts of fine sediment delivered to streams and depositing in the stream substrate has been documented to be harmful to aquatic species, including listed species. WDFW recommends a specific objective and path forward to address road maintenance issues. Currently road maintenance and repair on U.S. Forest Service controlled roads is only allowed to be conducted by the USFS without prior agreement. Within the NWFP area, provisions to expressly allow for third-party road maintenance and decommissioning of roads has proved successful on the Cle Elum Ranger District and other forests that have a memorandum of understanding with the State.

Thank you for the opportunity to provide input on developing an amendment to the NWFP. Please reach out to WDFW if you have any questions about our suggestions.

Sincerely,



Kelly Sussewind
Director

References:

- Franklin, A. B., Dugger, K. M., Lesmeister, D. B., Davis, R. J., Wiens, J. D., White, G. C., ... & Wise, H. (2021). Range-wide declines of northern spotted owl populations in the Pacific Northwest: A meta-analysis. *Biological Conservation*, 259, 109168.
- Nelson, J., D. Cottam, E. W. Holman, D. J. Lancaster, S. McCorquodale, D. K. Person. 2008. *Habitat Guidelines for Black-tailed Deer: Coastal Rainforest Ecoregion*. Mule Deer Working Group, Western Association of Fish and Wildlife Agencies
- Pacific Northwest Research Station. 2020. Predicting where elk will thrive. New models point the way. *Science Findings Issue 231*, September 2020. U.S. Dept. of Agriculture.
- Rowland M., Wisdom M, et. al. 2018. *Modeling Elk Nutrition and Habitat Use in Western Oregon and Washington*. *Wildlife Monographs Vol 199*, November 2018.
- Rue, L. 1997. Chapter 20 *Improving Deer Habitat in The Deer of North America*. (2nd. Ed.). The Lyons Press. New York.
- Toweill, D and Thomas, J. Chapter 12 *Elk Habitat Selection and Evaluation in North American Elk Ecology and Management* (2nd. Ed.) *Wildlife Management Institute*, Washington D.C.
- Washington Department of Fish and Wildlife. 2022. *Mount St. Helens Elk Herd in 2022 Game status and trend report*. Wildlife Program, Washington Department of Fish and Wildlife, Olympia, Washington, USA.
- Washington Department of Fish and Wildlife. 2022. *South Rainier Elk Herd in 2022 Game status and trend report*. Wildlife Program, Washington Department of Fish and Wildlife, Olympia, Washington, USA.
- Washington Department of Fish and Wildlife. 2022. *South Cascade Mountain Black-tailed Deer Management Zone in 2022 Game status and trend report*. Wildlife Program, Washington Department of Fish and Wildlife, Olympia, Washington, USA.
- Washington Department of Fish and Wildlife. 2015. Chapter 2 including Elk in 2015 Game Management Plan. Wildlife Program, Washington Department of Fish and Wildlife, Olympia, Washington, USA.
- Washington Department of Fish and Wildlife. 2006. *Mount St. Helens Elk Herd Plan*. Wildlife Management Program, Washington Department of Fish and Wildlife, Olympia. 52 pp.
- Washington Department of Fish and Wildlife. 2002. *South Rainier Elk Herd Plan*. Wildlife Program, Washington Department of Fish and Wildlife, Olympia. 32 pp.
- Washington Department of Game. 1961. *Blacktailed Deer of Western Washington*. *Biological Bulletin No. 13*. Washington Department of Game, Olympia. 124 pp.
- Wisdom MJ, Nielson RM, Rowland MM and Proffitt KM (2020) *Modeling Landscape Use for Ungulates: Forgotten Tenets of Ecology, Management, and Inference*. *Front. Ecol. Evol.* 8:211. doi: 10.3389/fevo.2020.00211