

February 2, 2024

Jacqueline Buchanan
Regional Forester
U.S. Forest Service
1220 SW 3rd Avenue
Portland, OR 97204

RE: Northwest Forest Plan Amendment: Notice of Intent

Dear Ms. Buchanan,

The Nature Conservancy (TNC) is a global, science-based, non-partisan organization committed to conserving the lands and waters on which all life depends. In Washington, Oregon, and California, TNC has over 1 million members and supporters and we manage lands and waters across all three states. TNC is also an active participant in collaborative forest management discussions, with staff based in communities across all three states providing science and technical support to inform ecological forest restoration. We partner with national forest units across the Northwest Forest Plan area to support ecological forest restoration and climate resilience.

TNC appreciates the U.S. Forest Service (USFS) proposal to amend the Northwest Forest Plan and concentrate efforts in five topic areas: fire resistance and resilience, climate change, mature and old growth forest ecosystems, Tribal inclusion, and sustainable communities. There are numerous factors supporting the need to update the Northwest Forest Plan. Tribal consultation and inclusion of Indigenous perspectives were lacking in 1994, and much of the western scientific lens that informed NWFP development at the time did not adequately acknowledge Indigenous Traditional Ecological Knowledge or recognize the significance of the eco-cultural fire regimes that shaped many NWFP landscapes. In addition, climate and ecological conditions have changed substantially and our scientific understanding of these systems has improved. These changes have been documented through the Northwest Forest Plan monitoring program, the Science Synthesis (2018), the Bioregional Assessment of Northwest Forests (2020) and other reports. These studies have documented significant ecosystem changes, including increased temperatures, increased fire extent and severity, substantial changes in weather patterns and hydrological systems leading to more flooding, a significant increase in the population of the non-native barred owl, and other changed conditions. Given the scope and scale of these changes, we support the agency's effort to update and modernize the Northwest Forest Plan to address these changes and help ensure that our region's national forests can thrive into the future.

One of our staff members, Dr. Ryan Haugo, is a representative on the Northwest Forest Plan Federal Advisory Committee and in that capacity is working on detailed recommendations for the plan amendment. We will continue to stay engaged in the FAC process and in further public involvement opportunities. For now, we offer these general comments regarding the scope of the proposed amendment:

Wildfire resilience

Historically, fire from both lightning and indigenous fire stewardship played a critical role in sustaining resilient forests in the Pacific Northwest, however, the cascading effects of fuel accumulation due to fire

exclusion practices and residual impacts of unsustainable forest management practices have significantly homogenized the forest landscape. Long-term monitoring of the Northwest Forest Plan has documented dramatic mature and old growth forest losses due to uncharacteristically severe wildfire. Severe wildfires have not been limited to dry forests, and in recent years this region has experienced an increase in high-severity fires in our wet forests compared to recent decades, due to the combination of drought, dry conditions and extreme weather – fueled by our rapidly changing climate. The trends in increasing climate-exacerbated wildfires across forest types warrants an in-depth focus on wildfire resilience to ensure the success of any proposed amendment to the Northwest Forest Plan, and TNC supports the inclusion of this topic area.

We support many of the FAC recommendations to reduce the regulatory burden for prescribed fire and cultural burning. Among other changes, we believe the amendment should promote restoration treatments in frequent-fire forest in Late Successional Reserves (LSRs) to facilitate beneficial fire inclusion. Science has shown that prescribed fire and Indigenous cultural burning are key processes for maintaining late-successional structure and species biodiversity in frequent-fire forests.

We also support the FAC recommendation to reimagine the concept of LSRs in frequent-fire forests to signal that science-based restoration activities may be needed around and within some LSRs to reduce fire hazard and restore ecologically appropriate structure, composition, pattern and disturbance process (i.e., fire).

Climate change adaptation

As noted by the FAC, “the NWFP did not adequately anticipate the scope, scale or impacts of climate change in its original formulation. Climate change-related stressors are posing significant threats to ecosystem resilience and function, community health and well-being across the NWFP planning region. Climate impacts such as high temperatures, extreme flooding, severe wildfires, loss of snowpack, and drought detrimentally affect ecosystem function, access to natural and cultural resources and the experience of forest users.”

The amendment is a critical opportunity to strengthen the capacity of NWFP ecosystems to adapt to the effects of and help mitigate the root causes of climate change. We support many of the ideas identified by the FAC including:

- Consider climate change vulnerability and adaptation in planning and implementation of treatments and other management and climate response/mitigation activities
- Establish standards for post-fire management
- Incorporate or reference Tribal climate change adaptation plans where available
- Establish goal to acknowledge that the ability of NWFP forests to sequester and store carbon is globally significant
- Establish desired conditions for wet, fire-infrequent forests focused on building increased in-forest carbon stocks in plantations that are depressed from past intensive management and maintaining stocks in mature and old growth forests
- Establish desired conditions for frequent fire forests focused on stabilizing existing in-forest carbon stocks from loss due to uncharacteristically severe disturbances such as fire

Conservation of old growth forest ecosystems

Conserving and expanding existing old growth ecosystems within the Northwest Forest Plan is critical for ensuring intact, functional landscapes and providing benefits to nature and people. However, current

threats to old growth and mature forests from drought, increased fire, pests and pathogens, and loss of diversity are threatening long-term forest stability and the continued development old growth ecosystems. Conserving old growth requires considering and addressing emerging threats to those forests, such as the increasing scale of high severity fire, drought, and warming climate, and using appropriate strategies for passive or active restoration to reduce risks to existing old growth and help recruit and sustain future old growth ecosystems. In some biophysical settings (e.g., frequent fire forests), this may look like using tools such as thinning and prescribed fire where those are ecologically appropriate to restore appropriate species composition, structure, pattern and process to support ecosystem resilience, resistance, and adaptive capacity. We support many of the FAC recommendations to augment conservation of mature and old forests and encourage the USFS to incorporate many of their recommendations. It will be particularly important to clarify in the plan amendment the conservation goals and management objectives of old growth forests across the varied biophysical settings of the NWFP.

Tribal inclusion

Tribal inclusion and Indigenous Traditional Ecological Knowledge were overlooked in the 1994 Northwest Forest Plan and the current amendment is an important opportunity to correct these significant oversights. More than 80 Tribal nations have lands and treaty rights within the NWFP area. These Tribes hold deep connections to the lands managed by the USFS and were the original stewards of these lands. Meaningful engagement of Tribal nations will be critical to the success of this proposed amendment. The FAC is developing robust recommendations for Tribal inclusion and we urge the USFS to incorporate as many of those recommendations as possible, including:

- Ensure USFS meets its obligation to conduct meaningful consultation with all affected Tribes in the NWFP area
- Include more opportunities for Tribal co-stewardship and co-management on NWFP forests, to preserve and conserve culturally sensitive species and First Foods
- Ensure Tribal access to lands across the NWFP area
- Encourage and support Tribes with their cultural burning goals and Tribal collaboration around prescribed fire treatments
- Incorporate Indigenous Traditional Ecological Knowledge
- Manage recreation to protect Tribal cultural resources

Sustainable communities

The NWFP affects a wide range of Tribal and non-Tribal communities across WA, OR, and CA. These communities depend on the NWFP national forests and conversely, NWFP forests depend on having adequate infrastructure and workforce within these communities. Infrastructure and adequate workforce will be essential for meeting the forest restoration needs across the planning area. The Bioregional Assessment estimates that 7 million acres across the NWFP area needs restoration through mechanical treatments and beneficial fire.

We encourage the USFS to consider the wide range of ideas being considered by the FAC to support the long-term sustainability of communities located near NWFP forests. Ideas that should be considered include:

- Support local infrastructure and workforce development and local contractors
- Support training and workforce development focused on prescribed fire, to ensure we have the workforce and skillsets needed to manage for ecosystem process and function

- Create more clarity and certainty around timber supply, which would help attract infrastructure investment
- Improve the predictability and certainty around restoration and stewardship activities which would support local business development
- Consider the wide range of partnership tools that are available to increase restoration work on NWFP forests, including the increased use of stewardship contracting with retained receipts that would be reinvested in the area.
- Consider the range of ideas from the FAC about how to reduce community wildfire risk adjacent to NWFP forests

Biodiversity

We support the FAC recommendations to work with the USFWS to implement active barred owl management strategies. We also appreciate the FAC recommendations around habitat refugia, climate/fire refugia, and connectivity and we hope that the amendment will include many of those recommendations.

Finally, we recall the words from the Science Synthesis that should guide the NWFP amendment throughout: “Conserving biodiversity is about more than protecting old-growth forests; it is also about maintaining processes, other successional stages, and forest dynamics at multiple scales.”

Conclusion

The Nature Conservancy strongly supports the USFS intent to amend the Northwest Forest Plan. This is a critical opportunity to increase climate resilience, ensure Tribal inclusion, protect old growth forests and improve the sustainability of Tribal and non-Tribal communities throughout the Plan area. Thank you for considering our comments. Please feel free to contact us if we can provide further information.

Sincerely,



Darcy Batura
Forest Partnership Director
Washington Chapter



Pete Caligiuri
Forest Strategy Director
Oregon Chapter



Dan Porter
Forest Strategy Lead
California Chapter