

February 1, 2024

ATTN: Northwest Forest Plan Amendment #64745

Thank you for the opportunity to provide comment on the Northwest Forest Plan (NWFP) amendment. The signatory forest collaboratives that make up the Washington Forest Collaborative Network (WFCN) share a common vision of working forests with thriving ecosystems and vibrant local communities. (The WFCN is made up of forest collaboratives across the state of Washington who meet bi-monthly to share knowledge and build support around collaborative forest health work on a state-wide level.)

The WFCN agrees with and supports the five identified needs for change within an updated NWFP. While the NWFP has been successful in certain areas, forest collaboratives across Washington would like the United States Forest Service (USFS) to build these successes to meet changing conditions, while also acknowledging the significant detrimental impacts the plan had on rural communities and taking steps to address these impacts. Furthermore, the WFCN embraces the shared goal of seeing our respective forests thrive for generations to come and recognizes the spiritual and cultural values and multitude of ecosystem services our forests provide. The following paragraphs include shared recommendations that the signatory WFCN participants would like to see included in an Environmental Impact Statement (EIS).

Many active participants in our collaboratives live within the wildland urban interface. After having experienced several major fire events in recent years, wildfire resilience in forests and their surrounding communities is at the forefront of many conversations. The intersection of fire management and traditional ecological knowledge has also been a topic of interest for our collaboratives. As such, the WFCN fully supports tribal inclusion within the updated NWFP. Additionally, participants of WFCN would like to see the USFS prioritize a concerted effort to identify and preserve cultural resources.

Our collaboratives place a strong emphasis on using the most recent available science to guide management decisions. WFCN participants, therefore, would like to see the wealth of 'new' research findings from over the last 30-years added to (i.e., inform any amendments to) the NWFP, especially around climate change and managing mature and old growth forests. We also strongly support federal funding for rigorous long-term scientific monitoring protocols to assess the efficacy of any future NWFP treatments.

Many of the forest collaboratives that comprise the WFCN were born directly out of the devastating economic impacts of the NWFP. Therefore, we are uniquely invested in ensuring that any amendment includes a commitment to the economic revitalization of rural communities surrounding USFS lands. In particular, the WFCN would like to see an emphasis on both maintaining and improving existing forest products infrastructure. We also support

preventing any further loss of infrastructure, which has already decimated rural economies and communities that depend on a sustainable timber supply. We also encourage the USFS to introduce mechanisms within the NWFP amendment that encourage each forest to cultivate relationships within local communities and workforce development programs. This will support a qualified and skilled local workforce and will ensure that money is spent on local harvests and that treatments stay within local communities.

WFCN participants have also noticed a significant shift in USFS staffing and personnel over the last few years. Most, if not all, of our forests are chronically and severely understaffed, with employees increasingly working remotely or commuting from outside the communities in which they work. To course correct these alarming trends, we request investments to fully staff ranger stations with USFS employees that live within the communities in which they work. For example, we support addressing local housing issues by investing in more USFS-owned housing and efforts to close the gap between salaries and local housing costs. Housing solutions should avoid deepening the unhoused and rental disparities many of the rural communities are currently affected by. Additionally, the top-down nature of federal hiring makes it nearly impossible for ranger districts to control their own hiring. Streamlining the hiring process, therefore, would allow qualified local community members to gain employment and would further integrate national forests with their respective communities.

The final common thread in our discussions around the NWFP amendment is the need for true adaptive management. Local ranger districts on our forests have lacked the ability to respond and quickly adapt to changing conditions. Beyond the programmatic, policy, and planning needs mentioned, the USFS should consider significant financial investments at the forest and district levels to support the execution of the NWFP on the ground.

In closing, the WFCN is grateful for the opportunity to comment on the NWFP amendment. We look forward to learning more about the changes being considered and providing more thorough feedback to any proposed actions in the draft EIS later this year.

Sincerely,

Washington Forest Collaborative Network Signatory Participants:

Pinchot Partners - Gifford Pinchot National Forest, Cowlitz Valley RD

South Gifford Pinchot Collaborative - Gifford Pinchot National Forest, Mt. Adams RD

Northeast Washington Forest Collaborative - Colville National Forest