



**Washington Native Plant Society**  
*Appreciate, Conserve, and Study Our Native Flora*

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(206) 527-3210

February 2, 2024

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

RE: Forest Plan Amendment for Planning and Management of Northwest Forests Within the Range of the Northern Spotted Owl – Scoping Comments for Environmental Impact Statement

Dear Ms. Buchanan:

The Washington Native Plant Society (WNPS) is a non-profit organization with 12 local chapters and 2,500 members statewide. For over 45 years, WNPS members have prioritized conservation of intact native plants and plant habitats for their intrinsic ecologic function and value. WNPS promotes native plant appreciation with a variety of educational and conservation activities that are open to the public. These activities include studying plants in their native habitats. Our botanizing activities often occur on national forest lands in Washington, including those forests within the range of the northern spotted owl.

We are providing scoping comments on the notice of intent to prepare an environmental impact statement to analyze amendments to the 1994 Northwest Forest Plan. This amendment is an opportunity to build on what has worked well over the past 30 years while updating the Northwest Forest Plan to the 21st century.

The amendment focus areas should include climate change and forest resilience. Carbon sequestration should be the primary objective of at least some, if not all, mature and oldgrowth forests, perhaps through the designation of carbon reserves.

All remaining oldgrowth forests should be protected. Although the Northwest Forest Plan protects some oldgrowth forests, it does not protect all of them. Logging of oldgrowth forest in the Matrix should be prohibited. Only half the acreage in Late Successional Reserves is oldgrowth; the rest of the acres are old plantations from the 1960s and 1970s on their way to becoming mature forest.

All remaining mature forest should be protected, no matter what the management allocation. It is imperative that forests on the cusp of becoming oldgrowth be protected. Also, more early seral forest should be allowed to become mature so there is a recruitment to replace mature or oldgrowth forest lost to fires, windstorms, insects and disease. Reserves should focus on habitat and ecosystem health and landscape connectivity.

We encourage a holistic approach to protecting all remaining oldgrowth and mature forest in large areas, restoring late-seral stage habitats and establishing habitat connectivity across land ownerships. Conserving and restoring older multi-layered forests across the range of the northern spotted owl will help the species to be resilient to future impacts of natural disturbances and climate change. Many other plant and wildlife species will benefit from northern spotted owl habitat protections.

The amendments should base wildfire risk reduction on solid, current science. Each forest area has its own history of growth and disturbance, both natural and human-caused, and these local differences should be taken into account rather than applying broad-based fire risk reduction methods. For example, thinning of west Cascades forests does not prevent major wildfires burning under extreme conditions of drought, low humidity, heat and high wind. Fire risk reduction should focus on community preparedness, including home hardening and defensible spaces, and stop the building of homes and businesses in the Wildland Urban Interface.

We support tribal inclusion and co-stewardship to incorporate indigenous ecological knowledge with western science. This integration could improve understanding of many aspects of the environment and how humans traditionally interacted with biophysical processes to maintain food, medicinal and material resources.

In conclusion, we urge adoption of a modern Northwest Forest Plan amendment that ends the commercial logging of our remaining oldgrowth forests and provides stronger protections for the mature forests needed to recruit more oldgrowth over time while incorporating response to climate change through designation of carbon reserves.

Sincerely,



Gail Sklar  
President  
Washington Native Plant Society



Becky Chaney  
Conservation Committee Chair  
Washington Native Plant Society