



# OLD-GROWTH FOREST NETWORK

*Connecting people with nature by creating a national network of protected, mature, native forests*

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Dear Regional Forester of the Pacific Northwest Region,

The Old-Growth Forest Network consists of thousands of people across the US who care about our oldest forests and want them preserved. We are writing to share scoping comments regarding the proposed Northwest Forest Plan Amendment. The Northwest Forest Plan has been an important and successful creation for the protection and future of our forests. Need for change as identified in the NOI should be considered carefully and not degrade the demonstrated successes of the plan in reducing logging emissions, protecting existing old-growth forests, and promoting storage and sequestration of carbon that is a crucial tool in our ability to address climate change.

In addition to prohibition of timber harvesting in old-growth stands, we recommend that the Northwest Forest Plan prioritize more recruitment of old-growth forests by protecting all stands 80 years and old in order to become future old-growth forest habitat. In a landscape with trees that can live centuries, logging them at maturity as defined by timber yield reduces their life-long ability to sequester carbon and provide other co-benefits to the forest ecosystems. Not only do these long-lived trees create essential carbon reserves that benefit all people, they serve as essential habitat for the Northern Spotted Owl. Because portions of the owl's range have been affected by wildfires, more forests should be set aside to age into this habitat type and provide a resilient range of habitat becoming available instead of impacting areas through logging to reduce wildfire, which itself can further degrade the Northern Spotted Owl habitat.

Additionally, late successional reserve landscapes affected by fire should not include salvage or post-fire logging except for limited cases of maintaining public safety. Fuel-reduction logging is not demonstrated to be effective on a landscape-wide scale because of the low probability fire will occur in a treated area before it regrows, but does create known emissions and negative impacts by compressing soil, increasing susceptibility to erosion, reduces moisture (which creates naturally fire-resistant conditions), and destroys understory layers of these forests. Logging cannot truly mimic natural disturbance and cannot provide the resilience, ecological, and carbon-storage benefits that are created in forests with minimal active management. Efforts to protect people from wildfire should be concentrated in high risk areas such as the wildland-urban interface.

In regards to the NOI topic area of economic opportunities for proximate communities to National Forest Systems Land, we urge the agency to adequately consider non-timber values and employment outside of the timber industry. The economic impacts of the outdoor recreation and nature-based tourism industries have grown and the employment landscape of the NWFP region no longer relies on timber industries as it once did. We request that the draft environmental impact statement provide a robust analysis of these changing conditions. Additionally, the economic impacts of non-forest products



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should include non-consumptive experiences and values associated with outdoor recreation and nature-based tourism.

It will be a challenge to amend the Northwest Forest Plan to consider the impacts of climate change and opportunities for mitigating risk and amplification of these challenges, but we urge the agency to prioritize the protection and recruitment of mature and old-growth forest as a primary strategy. Amendments to this policy should align with Executive Order 14072, *Strengthening the Nation's Forests, Communities, and Local Economies* and ongoing nationwide forest plan amendment NOI to conserve old-growth forests. Thank you for the opportunity to provide input on the Northwest Forest Plan amendment scoping period.

For the Forests,

**Sarah Adloo, Ph.D.**  
Executive Director  
Old-Growth Forest Network

