



Date: February 2, 2024
From: Willamette Riverkeeper
To: US Forest Service
Re: Northwest Forest Plan Revisions

Dear US Forest Service.

Please accept the following comments from Willamette Riverkeeper regarding the amendment process for the Northwest Forest Plan. Willamette Riverkeeper is a 501(c)(3) conservation non-profit organization dedicated to protecting and restoring the Willamette River, its tributaries and the Watersheds in which they are located. The management of federal forests directly impacts the health of the Willamette River system.

Federal forests in the Pacific Northwest are critical for protecting fish and wildlife species, clean water, sequestering carbon, recreation and spiritual renewal. Prior to the adoption of the Northwest Forest Plan in 1994, federal forests in the Pacific Northwest harvested timber at highly unsustainable rates resulting in significant degradation of our environment. These practices resulted in the listing of the Northern Spotted Owl and the Marbled Murrelet, while likely contributing to the subsequent listing of multiple salmonid species under the Endangered Species Act.

The damage to our forests committed over decades cannot be quickly remediated; recovery of old growth ecosystems will be measured in centuries, not decades. The Northwest Forest Plan provides the regulatory framework for that recovery. In that context, while it is appropriate to apply adaptive management principles to the NW Forest Plan, it is also critical to recognize that NW forests are still in the very early stages of their journey back to ecological health.

The climate crisis was still on the horizon when the NW Forest Plan was adopted. 30-years later, it is the greatest threat facing our planet. The climate crisis only elevates the importance of maintaining and increasing the strength of the NW Forest Plan, both in terms of needing to create resilient forest landscapes in the face of climate change and in terms of viewing NW forests as a natural climate solution for sequestration of carbon.

In advancing an amendment to the plan, Willamette Riverkeeper urges you to consider the following points:

1. **As an overarching principle, we urge the US Forest Service to approach this amendment from the perspective of strengthening the NW Forest Plan.** While the Plan represented a significant step towards conserving and protecting forest ecosystems, and in particular, mature and old growth forests, at the time of its adoption, it was also a significant compromise including allowing upwards of one million acres of mature federal forestland to be vulnerable to harvest. The changes that have occurred since adoption all point to the need to retain and expand protections. These changes include the climate crisis and a related increase in extreme weather events including fire and drought, the arrival of the barred owl, and expanding biodiversity crisis continued declines of listed species including Northern Spotted Owls, Marbled Murrelets, salmon and martens with more species such as the red tree vole, Columbia torrent salamander proposed for listing. It is essential that amendments increase forest resilience in the face of these growing challenges.
2. **Preserving biodiversity must be at the core of any revisions.** This includes not only threatened species, but others that have been impacted by the loss and fragmentation of their habitat, and those pending for listing under the Endangered Species Act.
3. **President Biden's 2022 Executive Order on forests and the climate gave the Forest Service clear guidance that it should prioritize the protection and restoration of mature and old-growth forests (trees generally over 80 years old) across the nation as a natural carbon and climate solution.** The Northwest Forest Plan governs the largest natural carbon reserves found anywhere in North America, and an amendment must recognize and safeguard the vast amount of carbon that can be sequestered and stored in these forests. The general direction to conserve trees over 80 years old in designated reserves has begun to reverse the loss of old-growth to logging, which in turn has turned PNW lands managed by the Forest Service from a carbon source to a carbon sink. However, not all of these older forests were protected under the plan, and every timber sale emits carbon to the atmosphere. The plan amendment should protect all mature and old-growth forests.
4. **Preserving biodiversity and connected wildlife habitat across the region should be a core principle of any forest plan revision.** The genesis of the NW Forest Plan was the listing of the Northern Spotted Owl. Today, the list of imperiled species due to unsustainable logging practices has only grown larger and the Northern Spotted Owl is at the brink of extinction. Protecting biodiversity should remain at the core of the NW Forest Plan.
5. **Amendments should recognize the wide variety of social and economic benefits National Forests provide for local communities and the region as a whole,** not just

timber, but also clean water, climate stability, quality of life, outdoor recreation, and a greater variety of forestry jobs.

6. **In light of the removal of BLM forests' removal from the Forest Plan's regional reserve system, new information about the importance of older forests for the climate, and the ongoing needs of wildlife for connected habitat, any amendment to the plan should enhance protected, connected, and redundant reserves by including all mature and old-growth forests and core wildlife areas without roads (1000 acres or larger).** The reserve network, including riparian reserves, should have clear and enforceable limits on logging and road impacts.
7. **Fire resistance and resilience can be bolstered by preserving and restoring mature and old-growth forests.** Fuels and fire management should focus on the home ignition zone and on non-commercial treatments and beneficial fire use, not commercial logging. Commercial logging for fuel reduction can negatively impact wildlife habitat, remove large fire-resistant trees, and create hazardous fire conditions. Standards must ensure that fuel reduction is both needed and effective before logging is allowed.

In conclusion, we need a strong forest plan that addresses modern science and public values and the needs of future generations. The amendment process must increase the protections embodied in the NW Forest Plan, not take us backwards.

Thank you for your consideration.

Bob Sallinger
Conservation Director
Willamette Riverkeeper