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Comments: Attached please find a summary of current scientific understanding about the frequent-fire forests in the Klamath Ecoregion, which constitute the majority of Forest Service landscapes in northwestern California. These comments are submitted specifically to inform the development of the Northwest Forest Plan (NWFP) amendment elements that affect the five National Forests in the Klamath ecoregion (four in California's Region 5 and the Rogue-Siskiyou NF in southwestern Oregon). The ecological dynamics of the 'dry, frequent-fire forest' landscapes of the Klamath ecoregion are substantively different from those of the mesic forests in western Washington, Oregon, and coastal northwestern California that otherwise are likely to dominate the NWFP amendment, and the Forest Service must incorporate the scientific framework in the attached summary into the amendment in order to address the 'dry forest' dynamics in the interior of northwestern California and southwestern Oregon.

While these interior landscapes differ from the mesic, coastally influence forests in numerous ways, there are two overarching differences that really must be addressed in order to achieve landscape resilience as climate and fire dynamics in the Pacific Northwest continue to unwind.

*The first major difference is that the dynamics of fire and fuels management in the region require that management be directed at reducing fuels loadings throughout the forests, and that this changed focus must include a restoration of 'good fire' (i.e., prescribed fire or managed wildfire) to an active role in land management. The Regional Bioassessment and the Science Synthesis prepared as supporting documents for the amendment both recognize the altered dynamics that make this change necessary in these 'dry' forests, although it seems likely that this change should occur broadly throughout much of the Pacific Northwest.

*The second difference with respect to the Klamath ecoregion is an acknowledgment that forested landscapes in the region demonstrate a fundamentally different ecological dynamic when compared to the 'moist forest' dynamics that misinformed the 1994 NWFP. Landscapes in the ecoregion occur in a dynamic mosaic in which alternative (i.e., non-conifer-dominated) landscapes are naturally favored by disturbance processes that have formed and continue to affect the landscapes in the region. The dynamics in this ecoregion are similar to the dynamics identified for the 'eastside' forests in the Region 6 of the Pacific Northwest, and similar management guidance is needed in order to address the frequency and magnitude of landscape dynamics here.

The attached summary also addresses several changes in scientific understanding that post-date the adoption of the 1994 NWFP, which need to be included in and addressed by the NWFP amendment, and then included in and addressed by the amended Land Management Plans of the National Forests in the ecoregion. The most significant change is certainly the increased understanding of landscapes as dynamic mosaics that need to be managed as systems that change through time as disturbance events occur in different places. That is, landscapes need to be managed as time-varying rather than static. In addition, scientists now understand substantially more about the dynamic processes that occur in ecological communities and ecosystems (including subsurface ecohydrological processes in the Critical Zone), and this improved understanding needs to be reflected in the NWFP.

Climate change is a significant driver of ecological changes in federally managed lands in northern California, but the full range and scope of the potential changes in landscape dynamics aren't yet known, and retention of some future management flexibility at local levels is likely to be beneficial. Changes in the socioecological patterns in the federally managed lands in northwestern California are underway, including potential restorations of salmonid fisheries following flow restorations in two major river basins, for which conditions in managed National Forest landscapes must play a major role. For the Forest Service to meet those obligations fully will require that

management plans be based on a continuing commitment to obtain and follow the best available science, as required by the 2012 Planning Rule (36 CFR § 219.3). The attached summary document is hereby submitted in the hope that it will help frame the agency's management approaches during coming decades.