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Comments: Northwest Forest Plan (NWFP) Amendment Comments

As a former U.S. Forest Service employee, now recently retired, I was involved with the NWFP for many years and very much appreciated its goal related to conservation of late-successional forests ecosystems, the use of best available science and its "borderless" management to landscapes covering various National Forests. With that said, I do see the need for clarification of direction in order to meet and expand this goal, in particular:

- *to capture the vegetative diversity across the NWFP geographic area,
- *to incorporate the ecological role of fire across these landscapes,
- *to give increased recognition to baseline conditions (e.g. stand density, fuel loading) that our outside what would have been the case under "natural" fire return intervals,
- *to develop an adaptive framework to address changing conditions (e.g. spread/introduction of invasive species, climatic changes) and,
- *to broaden the strategies available (e.g. wildland fire use) to restore fire to the ecosystems.

The following are comments from various sections of the BioAssessment document.

Chapter 2 of the BioAssessment and Recommendation 2- Desired conditions that address the diversity of ecosystems and resiliency THIS NEEDS to be emphasized first and foremost. Before "products" (forest, recreation..).

The document mentions that while "adaptive management areas" were designated, they were not used to learn about management approaches. This was most unfortunate. For the revision, I want to emphasize the need for clear direction/a task force/staffing/guidance to best ensure that management approaches be founded with adaptation in mind BASED UPON an intact monitoring program in place AND that monitoring apply to any land allocation.

Recommendation 3 and 4- Riparian and aquatic areas are dynamic, not a setting that should be, by default, hands-off when it comes to ecologically based restoration. This orientation and the associated management direction surrounding these areas appeared to have a narrow viewshed which can compromise the system. For example, invasive plant species like himilayan blackberry (*Rubus armeniacus*) are choking various stream sections-out-competing native deciduous shrub and tree species that provide habitat elements for certain avian species (e.g. berry producing shrubs), organic litter to streams serving as food resources to invertebrates that support various fish species and blocking migratory routes and access to water for mammalian species. See the attached document which addresses riparian areas under the Special Considerations section.

In the Bioassessments, Recommendation 4 speaks to proactive invasive species management (early detection, rapid response). This is critical. On the Forest where I was working, WHEN fiscal resources were available, we (including partners) would conduct inventories to prioritize settings that would benefit the most from focused management (early detection/rapid response). Subsequent monitoring of the some of the areas we managed resulted in no detection of the invasive species over consecutive years. Unfortunately, the fiscal resources were not sustained, so the efforts in some cases, were in vain. NOTE: as a part of the Bioassessments, having consistent management direction across the geographic area and shared stewardship is articulated in the document, yet, I ask that the need for sustainable fiscal resources be raised in any subsequent document, if any effort is going to make a difference.

Related to invasive species-plants specifically--the Synthesis of Science document associated with the

amendment documentation includes a salient statement "Management of these species requires an understanding of their ecology and does not lend itself to a one-size-fits all solution (D'Antonia and Meyerson 2002)". The application of restoration to a given habitat setting will need to factor in the pros and cons associated with risk of invasive plant (pathogens as well) introduction and spread AND how/if the restoration mechanisms might reduce this risk.

Given the stated emphasis of "ecologically sustainable landscapes" articulated in the document, Recommendation 5, stating to prioritize communities at risk reads in contrast. While communities at risk need attention, I would ask that these landscape setting (WUI- "wildland urban interfaces") be separated in terms of management approach. WUI's need their own prioritization criteria and management approaches/tools, likewise landscape settings beyond WUIs do as well. An example, in the case of the latter (non-WUI settings),

- *What vegetation types have the longest missed fire return intervals in the planning area?
- *What are the ecological underpinnings/values of these areas (e.g. old-growth forests, habitat for species of concern, enriched mixed conifer forest of the Klamath Mtns) and the risk of their loss if not extinction?

This distinction makes sense-WUIs (which includes infrastructural areas like powerlines) have their prioritization criteria AND landscape settings (e.g. vegetation types, vegetative successional areas, riparian areas) have their own.

Recommendation 6 is a fundamentally important orientation for any revision. Baseline conditions have been so altered by fire suppression, types of land management activities (e.g. clearcutting and a delay in subsequent management resulting in dense stands) and climatic shifts, that particular vegetation types and their ecological role are at risk due to the increased geographic scale and severity of fires.

Associated with this recommendation is an "all-lands approach". This approach has merit in terms of a landscape scale management approach across jurisdictional ownerships AND this should be encouraged for sure, but many of the "diverse ecosystem settings of the broad BioA area" are not associated with private lands. I would ask that this recommendation acknowledge that lands under USFS management may need to be prioritized IF cross-jurisdictional management is stifled in terms of planning, budgeting, approvals... and not leading to results. Let the landscape scale priorities associated with the National Forests take precedent.

Also related to this recommendation, I support the need to update land management plans to support the use of what I term "wildland fire". Identifying landscape settings where this approach could be applied should be a key component of an ecologically based fire management strategy.

As to Recommendation 7 related to the use of timber harvest as a restoration tool, this recommendation has merit ONLY if timber is a by-product of restoration, not the driving impetus for logging in landscape settings. The use of timber harvest-its basis as a restoration tool-will need to be substantiated in any project document. I ask that such substantiation be required for inclusion of timber harvest as a restoration tool.

The NWFP Survey and Manage program garnered so much new information about species associated with late-successional forests and especially those groups of species that are not given much attention compared to those that are Federally listed: bryophytes, amphibians, small mammals, lichens and fungi. Recommendation 8 and Chapter 4 do not capture what was learned as a result of the species surveys but focuses on items that discredit the work: "complex and lengthy survey protocols and requirements for managing known sites". I would disagree relative to survey protocols in which I was involved (non-vascular, vascular and fungi species) on all the accounts raised in Chapter 4. Also project level surveys in potentially suitable habitat and needed mitigations for most of the taxa groups mentioned were no more or less than would have been undertaken for Forest Sensitive species. I challenge, at least for the species groups I have mentioned, that managing for known sites has been an overwhelming obstacle to land management and restoration objectives. There is need for "space" or some established latitude relative to survey and manage species when ecologically-based restoration is substantiated for a given landscape setting. I would ask that future documents related to the amendment not dismiss and over-

generalize the Survey and Manage program but to articulate that ecologically based restoration projects in late-successional forests may need to include design features aimed to reduce potential negative impacts to species.

As to how the data were used to make recommendations or change in species status etc. yes, this is unfortunate that periodic review was not undertaken. The agency shifted orientation and opted to expend resources elsewhere. If it is the direction regarding species review that was confounding; it would have been worth it to edit, not to stop altogether.

In Chapter 5 under the Fire and Fuels section, I support the identification of fire ecology groups as a framework to guide management approaches and their application to future late-successional reserves as well as other habitat settings. As stated previously, I would ask that draft criteria be established (for non-WUI landscape settings in particular) that would prioritize those landscape settings, regardless of land allocation, where:

*fire return intervals have been notably missed compared to "natural" return intervals, and

*habitat settings are at risk to high severity fires including the loss of or possible species elimination (consider those species endemic to a certain bioregion, if not narrowly endemic)

*fire reduction has resulted in a decline of habitats and associated species dependent on fire and its ecological role.

In closing, further into the document, there is a quote from Spies et al. 2018 "Conserving biodiversity is about more than protecting old-growth forests it is also about maintaining processes, other successional stages, and forest dynamics at multiple scales." This salient statement should serve as a foundation for any updates or changes to the NWFP.

Respectfully submitted,

Lisa D. Hoover

P.S. While you have much documentation for the amendment, I have attached a document developed to provide ecological guidelines for a proposed Landscape Fire and Fuels project on the Six Rivers National Forest. The landscape settings are diverse and their scale variable (e.g. ultramafic "islands"). The scale/extent of restoration implementation will need to factor in this variation.