

Data Submitted (UTC 11): 3/11/2025 4:00:00 AM
First name: Denise
Last name: Mahnke
Organization: Washington Native Plant Society
Title: Executive Director
Comments: March 11, 2025

Jacque Buchanan, Regional Forester

U.S. Forest Service

333 SW 1st Avenue

PO Box 3623

Portland, OR 97208-3623

submitted electronically via webportal

RE: Northwest Forest Plan Amendment Draft Environmental Impact Statement

Dear Ms. Buchanan:

The Washington Native Plant Society (WNPS) is a non-profit organization with 12 local chapters and 2,750 members statewide. For 49 years, WNPS members have prioritized conservation of intact native plants and plant habitats for their intrinsic ecological function and value. WNPS promotes native plant appreciation with a variety of educational and conservation activities across the State of Washington 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 covered by the Northwest Forest Plan (NWFP).

The NWFP is of high importance to our organization and membership. Closed canopy late-successional and old-growth forest habitats are home to many rare and little known non-vascular plants including mosses, liverworts, fungi, lichens, and vascular plants like the western goblin (*Botrychium montanum*) clustered lady's slipper (*Cypripedium fasciculatum*), marsh corydalis (*Corydalis aquae-gelidae*) and boreal bedstraw (*Galium kamschaticum*). WNPS advocates for the on-going existence of these and other forest species dependent on

old-growth forests, recognizing that species biodiversity is in the best interest of the people of Washington State.

We are providing comments on the Northwest Forest Plan Amendment Draft Environmental Impact Statement (DEIS), therefore, specifically focused on Issue 2 - Forest Stewardship, which responds to the identified need for the amendment to Improv[e] conservation and recruitment of mature and old-growth forest conditions, ensuring adequate habitat for species dependent upon mature and old-growth ecosystems and supporting regional biodiversity (p. 1-5). This issue is relevant to the mission of the WNPS "to promote the appreciation and conservation of Washington's native plants and their habitats through study, education, and advocacy."

The DEIS analyzes four alternatives, including the proposed action (Alternative B.) The proposed action would:

- * Redefine "mature" and "old-growth" forests by raising the age class of stands that qualify for protection from logging and providing broad exceptions for logging in old-growth forests.
- * Increase aggressive logging on Matrix (non-reserve) lands
- * Allow logging in Late-Successional Reserves (LSRs) for purposes beyond old-growth restoration.
- * Expand logging in dry East Cascades forests.

Definition of Mature and Old-Growth Forests

We object to the proposed action to raise the age of mature forest (the stage of forest development immediately before old-growth) protected from logging from 80 years in the current NWFP to 120 years in moist forest and 150 years in dry forest (pps. 2-5 and 2-6). This change would dramatically reduce the amount of mature forest available for recruitment to become future old-growth forests or to replace mature or old-growth forest lost to fires, windstorms, insects and disease, and it directly contradicts the identified need for this amendment. The proposed action should treat the current definitions in the NWFP as the base for old-growth forest protections and should expand that protection to designating all remaining mature and old-growth forests as LSRs.

Logging in Late-Successional Reserves

We object to the proposed action to allow logging in moist forest "young" stands up to 120 years old in LSRs (previously restricted to stands up to 80 years old). This would open up 824,000 acres to logging. Only half the acreage in Late Successional Reserves is old-growth; the rest of the acres are old plantations from the 1960s and 1970s on their way to becoming mature forest.

LSRs are the centerpiece of the NWFP, creating an interconnected landscape for the forests of the Cascades and Olympic Mountains in Washington. These LSRs ensure the survival of old-growth dependent species. Trees between 80 and 120 years old already are or soon will be mature forests available for recruitment to become future old-growth forests.

We object to expanding the exceptions that would allow logging in moist forest LSRs. The current NWFP prohibits logging in moist forest LSRs unless it restores or accelerates late-successional or old-growth conditions to benefit federally listed species under the Endangered Species Act. The proposed amendment would add new exceptions to allow logging to "restore habitat for other species that depend upon younger stands" and to "achieve other desired conditions," eliminating the foundational purpose of LSRs.

We object to the proposed action to allow salvage logging following wildfires in moist forest LSRs. Salvage logging would remove snags created by wildfires. Snags are a crucial feature in structurally complex forests. They contribute to the vertical and horizontal structure of forests, creating a more diverse and complex environment. As snags decompose, they release nutrients back into the soil, enriching the forest floor and supporting plant growth. Snags also can make a forest more fire resistant by providing a buffer between the forest floor and the canopy. Post-fire logging also is known to increase fine fuels and drier conditions, thereby leading to larger and more severe future fires in logged-over landscapes.

All mature and old-growth forest on federal lands, including those areas that eventually burn or are reset by natural disturbances, must be protected in perpetuity if the NWFP is to fully achieve the goal of Issue 2 - Forest Stewardship.

Logging in Matrix

We object to the proposed action to shift from stand age to stand establishment dates in moist Matrix forest. The proposed action would not have any restrictions on logging forests less than 120 years old. The amendment proposes to log 81,000 acres in a decade "to bolster timber production." In moist Matrix forest established between 1825 and 1905 (up to 200 years old), logging would be allowed for multiple reasons at the agency's discretion, including a broad exception for "reducing the risk of fire." This proposed action means that older Matrix stands will never age into protection, curtailing recruitment of additional old-growth forests.

Logging of old-growth forests in the Matrix should be prohibited and all remaining mature forest should be protected, no matter what the management allocation. It is imperative that forests on the cusp of becoming old-growth be protected. Also, more early seral forest should be allowed to become mature so there is a recruitment to replace mature or old-growth forest lost to fires, windstorms, insects

Logging in Dry Forests

We object to the proposed action to allow logging in both LSRs and Matrix of trees younger than 150 years old in dry forests. We are concerned that the proposal to log at least one-third of dry forests over the next 15 years (964,000 acres) is excessive. Despite providing these acreage figures, the proposed action fails to provide any maps showing where dry forests exist within the planning area, leaving undefined discretion to local managers

directed to meet timber quotas. Within dry forests, trees older than 150 years would receive nominal protection from logging, but the proposed action includes broad exceptions for "restoration" and "to reduce wildfire risk."

Conclusion

We support a holistic approach to protecting all remaining mature (age 80 years and older) and old-growth closed canopy forests as well as younger forests that can be recruited over time to become mature and old-growth forests.

Sincerely,

Gail Sklar

WNPS President

ATTACHMENT-LETTER TEXT: 2025.03.11_WNPS Comment Ltr_Northwest Forest Plan
Amendment_DEIS_FINAL.pdf; this is the same content that is coded in text box; it was also included as an
attachment