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Regional Forester US Forest Service

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https://cara.fs2cusda.gov/Public//commentsInput?Project=64745

RE: Comments regarding the Notice of intent to prepare an environmental impact statement for Region 5 and Region 6; California, Oregon, and Washington; Forest Plan Amendment for Planning and Management of Northwest Forests Within the Range of the Northern Spotted Owl (NWFP).

I am retired from USDA Forest Service and was a vegetation manager and project/land management planner for 40 years. I worked in both Region 5 and Region 6. I have used the knowledge and experience I gained over the years of planning and preparing similar documents to this one in preparing my comments. Some of these comments are about topics/items that I looked for but did not ?nd. So, if they are present, perhaps they can get more attention.

ASSUMPTIONS-COMMENTS

I could not find information about the planning horizon this document.

Since you seem to use Stand age as a proxy for owl habitat, the planning horizon becomes very important. Using a typical measure for stand age weighted by basal area or by trees/acre from a stand exam will change over time and will change based on other survey statistics. Some of the trees that owls are most likely to use for roosting, may not be able to have an age taken by an increment borer because they are rotten or hollow. Stand age may also change as small trees in the understory achieve more weight in the statistics. Even if you use the age of the largest trees in the stand, stand age will change over time as large trees fall. (Please also see comments under implementation.)

The planning horizon is also very important for determining cumulative effects and for determining the long-term likelihood of the persistence of the northern spotted owl across the landscape.

PROCESS -COMMENTS

This document does not have the same Purpose and Need as 1994 NWFP (USDA Forest Service 1994), so seemingly, it should be called a revision and not an amendment. Or perhaps, there is other information that determines this distinction that you did not share with the public. [DEIS 1-4 and 1-5].

The intent of the 1994 NWFP (USDA Forest Service 1994) [to conserve mature and old-growth ecosystems and habitat for the northern spotted owl (NSO) and other species]. Typical habitat characteristics include:

* Generally high canopy closure;
* Complex canopy structure involving trees of multiple age or size classes;
* Large decaying trees and/or snags;
* A high volume of downed wood.

This document and its analysis uses a di?erent description/de?nition of NSO habitat than the 1994 NWFP. You state there is a need to use best available science throughout as you are preparing this based on 2012 Planning Rule, yet it appears that you did not use the best available science on owl biology (North et al. 1990, Hagmann et al. 2017, J.A. Blakesley et al. 1992, Irwin and D.F. Rock 2000).

There is no summary of how you identi?ed tribes for consultation for this project except some sketchy information in Chapter 4. I see where in the Monitoring report (Case-Scott and Lynn 2021) there were tribes who were invited but did not have funds to complete the consultation. Were there e?orts to obtain funding for these tribes to participate in the process? If not, why not? This seems to be an important topic for the public to have knowledge of and about.

There is not a prominent display of the hierarchy of legal direction. First and foremost is to conduct meaningful consultation with all a?ected tribes as required by treaty (Federal Register 88 FR 87393).

Where consistent with tribal goals and consultation and after consultation with USFWS on threatened and endangered species as required by law, consider implementing the following concepts. Coming after that would be laws and their associated regulations as well as case law which would be the Endangered Species act (ESA) per case law, then below that would be the National Forest Management Act (NFMA) Clean air act and Clean Water act regulations. If you disagree with this order, please display what you see as the correct hierarchy.

CONSEQUENCES-COMMENTS

The NSO is listed by USFWS as a threatened species. It is unclear how this plan provides for critical habitat as designated by the USFWS (Federal Register/Vol. 86, No. 215) and whether the USFWS will consider this plan adequate to maintain viable populations of northern spotted owls through out its range. Are you engaging in consultation with USFWS? If so, that would be valuable information for the public. Waiting to consult USFWS until after you make a decision leaves the public in the dark about any changes needed.

In section 3.3, you identify that recent wild?res have changed stand conditions. Yet there is no apparent information about the extent of those changes and how they might a?ect the success of this plan. Also, whether the identi?cation of LSRs that has not changed from the 1994 NWFP (USDA Forest Service 1994) will be adequate to conserve the Northern Spotted Owl. Perhaps this information is in the science report but you could make that clearer.

NSO need expanses of quiet (nearly undisturbed) mature forest with, large diameter trees for nesting and roosting. There is very little discussion of noise as a disturbance element and its e?ects on roosting NSO. Yet the alternatives propose actions that would di?er in their amount of disturbance.

It is unclear how the loss of NSO habitat to wild?re is incorporated and how or whether there will be any opportunities to adjust the quantity or placement of protections.

Hagemann et al. (2017) describe changes in habitat after restoration which is an example of how a stand Page 3 of 7nesting/roosting or foraging cover. Historically only 5% of area exceeded 30% canopy cover; currently, 67% exceeds 30% cover. Lack of historical NSO cover due to low canopy cover and high ponderosa pine (70 [plusmn] 19%). After restoration, there is a >600% increase in trees 15-53 cm dbh; substantial decline in trees ?81 cm dbh and a loss of widespread distribution of large trees and dominance by ponderosa pine.

Unfortunately. The document appears to be silent regarding non-federally recognized tribes, how many and where within the NWFP area. Although consultation is not required for these tribes, cultural resources associated with these tribes should be addressed.

IMPLEMENTATION and MONITORING

It would be great if this plan allowed for easy and quick implementation. But the direction on how to tell how old a forest stand is/how moist a forest stand is, looks challenging and complex. Will this really make a di?erence to success. Establishing monitoring and measuring protocols and conducting regular monitoring would help to demonstrate the e?ectiveness of this plan and actions taken.

CONCLUSION

It was necessary to complete this amendment to the NWFP because the NSO is barely hanging on. If this amendment to the NWFP is not successful in changing the trajectory of the NSO population, there is a great likelihood that the USFWS will have to change the status of the owl to Endangered and will have much greater say in the management of the forests.

Alternative C is most likely to provide low disturbance and habitat conditions that favor the NSO. The other alternatives provide more disturbance and habitat conditions that will favor barred owls and other NSO predators. For the continuation and recovery of the NSO, the highest goal for ecosystems within the NWFP area is to provide stable and non-disturbed mature and old growth forest which (Johnson et al. 2023):

* conserves moisture and stream conditions;
* provides habitat for threatened and endangered species such as the marbled murrelet, the northern spotted owl, the coho salmon;
* provides habitat for a wide variety of plants and animals;
* provides resistance to ?re due to moisture and canopy height and decay rates of materials on the forest ?oor.

Growth and age are advantaged by low or no disturbance which includes prohibiting the removal of trees through logging, thinning and other approaches. So that, tree removal should only occur if trees (dead or live) pose an imminent safety hazard. No new roads, right of way corridors and/or special use permits should be allowed. This goal is the top goal for the area encompassed by the previous Northwest Forest Plan (NWFP). Roads not only disturb soils but are also a continuing source of noise. Corridors for electric lines require tree pruning and/or removal ad in?nitum into the future. Prescribed ?re should be used sparingly and designed to reduce surface fuels and provide a non-?ammable substrate (char).

Northern Spotted owls, marbled murrelets and salmon do not thrive under disturbance! I add that only 10% of

area and not more needs to be in early seral stage (please see attachment Roche 2024) to provide sustainability.

An active program to relocate special use permits such as utility lines outside of NSO habitat should be encouraged and funded.

Old growth provides an important habitat for other plants, particularly lichens and orchids due to its height, moisture, structure and special substrates such as arboreal soils, fungal development and down woody material. Some plants need these features to survive and reproduce and have a di?cult time moving through other habitats that do not provide these features. There are orchids that need fungus gnats from decaying wood as pollinators. There are ferns that only grow on the trunks of trees. There are whole ecosystems dependent upon arboreal soils and micro ponds in the canopy.

Johnson et al. (2023) identify that the following concepts and practices are important to include in this revision:

* Cease logging of older, unmanaged forests and of remnant old trees in younger forests;
* Prohibit salvage logging in (previously designated) LSRs [late successional reserves];
* Utilize treatments, including thinning and burning, to restore old dry forests to approximations of their historical states.

I add that using ?re and perhaps thinning or reducing stand density outside of and around mature and old forest stands to accomplish fuel reduction and preserve mature and old growth forest would be an e?ective step in preserving and protecting mature and old growth forests. Establishing standards for the initiation of fuel reduction and standards for down woody retention would help to de?ne what is enoughand what is too much woody debris.

Johnson et al. (2023) identify that taking actions to: Restore salmon habitat in the ranches, farms, cities, and towns of the lower watersheds (on private lands) is important and might produce the greatest improvement for money spent and I add that restoring in-stream salmon habitat and applying prescribed ?re to reduce fuels in riparian areas on National Forest Lands is a companion action to produce an overall improvement in habitat.

Johnson et al. (2023) identify that "Work toward landscapes that allow for expression of a variety of life histories" is important. I add that only 10% of area and not more needs to be in early seral stage (please see attachment Roche 2024, Development of old growth). Or this project can work through the numbers to identify the desirable and limiting amount of early seral desired.

Increase the amount of density reduction (thinning) in riparian corridors only in forest plantations on NFS lands. But maintain variable spacing between trees, so that trees will grow at di?erent rates and remove or treat fuel with ?re so that riparian areas do not become wicks to move ?re under dry and windy conditions. Maintain shade on stream surface.

While Johnson et al. (2023) emphasize the following: "Continue to reduce density (thin) in younger forests across the landscape. At least 20% of these forests should remain untouched. Use variable retention goals and methods in younger (historic designation) matrix and removal of dead, burned trees in burned (historic designation) matrix." I add that you should implement these actions around and nearby the oldest old growth and reduce fuels in these areas. (Roche 2024), used age/size class modeling and indicates that no more than 10 percent of the total area should be in seedling age/size class.

Based on ?aws in the assumptions and in the process as discussed above, I disagree with the summarized

e?ects of the proposed action alternative and other alternatives for addressing maintenance of northern spotted owl habitat and viability of the northern spotted owl. The amount of disturbance from burning, logging and other permitted activities will favor the barred owl over the northern spotted owl and we will see continuing decreases in northern spotted owl populations and increases in barred owls.

It is imperative that the remaining lands under consideration in this e?ort be managed for the values of mature and old growth forest, keeping in mind that some forests are not just old but ancient (greater than 1000 years of age).

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ATTACHMENT-LETTER TEXT: cmts-nwfp-031625.pdf; this is the same content that is coded in text box; it was originally included as an attachment

ATTACHMENT-Other: tracking-development-old-growth.pdf; old growth calculation table