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On behalf of American Bird Conservancy which works to conserve birds and their habitats throughout the Americas, I'm writing to urge your support for strengthening the Northwest Forest Plan by increasing the protections it provides for mature and old-growth forests.

The Northwest Forest Plan is an effective policy that is providing additional habitat needed to recover the threatened Northern Spotted Owl and Marbled Murrelet. Restoring the late-successional ecosystem also benefits local communities providing recreation and specialty-products, as well as abundant clean drinking water supplies.

Please adopt a modified version of Alternative C, as outlined below, that provides added protection for mature forests essential to restore sufficient habitat. Increased buffers for forest management activities around Marbled Murrelet nests are also crucial to reducing nest predation, a key factor preventing population recovery, and that limits post fire logging in old growth forests and late-successional reserves.

We are concerned about language in all of the alternatives promoting increased logging of mature forests. These mature forests are essential for increasing the amount of old growth habitat and must not be sacrificed. This concern has increased as we consider the new executive order for increased timber production.

The direction of the executive order and the draft plan's preferred alternative do not address the extinction risk facing the Northern Spotted Owl, which is suffering from a severe and rapid population decline, as well as the slower decline to the Marbled Murrelet population. For these endangered species to recover, it is essential the existing habitat protections of the Northwest Forest Plan be maintained and built upon, not weakened or watered down.

Since protections were put in place for Spotted Owls and salmon the forests have been steadily rebounding. The Plan's 20-year monitoring report offers a clear picture of progress within expected parameters:

The maps showed net changes in amount of older forests on federal lands managed under the NWFP have been small (a 2.8 to 2.9 percent net decrease). This occurred despite gross losses from wildfire (4.2 to 5.4 percent), timber harvest (1.2 to 1.3 percent), and from insects or other causes (0.7 to 0.9 percent), suggesting that processes of forest succession have compensated for some of the losses resulting from disturbance. The Plan

anticipated a continued decline in older forests for the first few decades until the rate of forest succession exceeds the rate of gross losses. Decadal gross losses of about 5 percent per decade as a result of timber harvesting and wildfire were expected.

As these reports indicate, the Northwest Forest Plan is working and offers a strategy to both manage threats appropriately, and to provide for recovery of at-risk wildlife.

Marbled Murrelets are seabirds in the Pacific Northwest which only nest on large lateral branches of centuries-old trees found in old growth forests. These charismatic birds are primarily threatened by commercial logging of old-growth forests up and down the Pacific Coast. Without significant, unambiguous protections for the trees they nest in, and restoration of additional old growth habitat by protecting mature forests, this valuable species remains of critical conservation concern.

Further, the birds are highly disturbed by noise and activity, meaning that major buffers of at least 100 meters (328 feet) around known nesting stands are needed, at a minimum, to protect these birds. Placing buffers around old growth habitat also aids in reducing the microclimate effects of harvest activities and minimizes the ability of nest predators to access nests.

The recently completed Marbled Murrelet ESA status review found that the seabird continues to be a threatened population under the ESA. However, an endangered listing may have been warranted because the population is only reproducing at about a 25% replacement rate, indicating a major population decline may be coming in the near future.

The impact of forest fragmentation on federal lands, which leads to increased nest predation, was not adequately considered in the status review and is another reason why protecting both mature and old growth is essential for Marbled Murrelet recovery. An increased buffer around Marbled Murrelet nests will help minimize this fragmentation and penetration of the forest by ravens and jays that feast on Marbled Murrelet eggs and chicks. We recommend doubling the current buffer to one mile from the current half mile circle around the nest.

Spotted Owls also rely heavily on mature and old growth trees for nesting, roosting, and feeding. These birds are endemic to the Pacific Northwest and have been the face of forest conservation since their initial listing in 1990. They serve as important rodent control species and are also overall forest health indicators due to their predatory nature.

Protection of all the remaining old growth forest habitat is essential to its recovery. Substantial amounts of mature forests must be allowed to become old growth to provide for a future population increase and recovery.

We therefore recommend the amendment protect all old growth from commercial logging, and provide for protection of mature forests 80 years and older needed to provide for an adequate amount of habitat for the Marbled Murrelet's recovery. This will also have substantial a climate benefit because Marbled Murrelet habitat overlaps with the most carbon dense forests.

The Northwest Forest Plan addresses the conservation of mature forests by including significant areas in reserves that protect stands over 80 years of age. The proposed plan amendment proposes to add protections for old growth and mature forests in the moist matrix and Adaptive Management Areas. Conservation groups are urging that the Forest Service boost protections to build on the success of the plan:

We recommend the amendment continue the Plan's focus on recovering the Northern Spotted Owl, Marbled Murrelet and salmon stocks in the region suffering from insufficient late-successional habitat. Further protection of the immense carbon stores and carbon sequestration capacity of mature and old forests along with large trees in dry forests within the range of the Northern Spotted Owl will help mitigate climate change and ensure that older forests and large trees continue to act as climate and wildfire refugia.

For the Northwest Forest Plan amendment we recommend that a modified Alternative C result in:

1. Protection of all stands 80 years and older. This is the age where forests begin to mature and become suitable Northern Spotted Owl habitat. Given the severe shortage of contiguous old growth in the region, continuing the Northwest Forest Plan restoration strategy and reserve designation are essential to recover the owl and threatened Marbled Murrelet, and at the same time continue and increase climate change benefits.

2. Increased buffers around Marbled Murrelet nests to reduce forest fragmentation and resulting nest predation.

3. Limitations on post-fire logging in old growth forests. Other than maintaining public safety, post-fire logging in old growth should be prohibited.

Additional Benefits to Birds from Mature and Old Growth Forests

A key climate solution comes from protecting existing high carbon stores such as old growth forests and allowing for their expansion. Twelve percent of U.S. emissions were absorbed by forests in 2021. Protecting these high carbon areas benefit the climate and provide increased habitat for birds. Under the Northwest Forest Plan, the region's forests have gone from a source of polluting emissions into a carbon sink according to EPA annual emissions data.

In a changing climate, old growth forests are also likely to be important refugia for diminishing wildlife populations. In a 2017 study, Old-growth forests buffer climate-sensitive bird populations from warming, researchers at Oregon State University's College of Forestry found that two tracked species of songbird-Wilson's

Warbler and Hermit Warbler suffering from limited population growth from increasing climate change-were finding refuge in old growth forests.

In a similar follow up study Forest microclimate and composition mediate long-term trends of breeding bird populations the authors conclude that "Conservation of old-growth forests, or their characteristics in managed forests, could help slow the negative effects of climate warming on some breeding bird populations via microclimate buffering and possibly insurance effects."

Assemblages of Bird Species in Western Coniferous Old-Growth Forests found that the Pileated Woodpecker, Goshawk, Vaux's Swift, Townsend's Warbler, and Hermit Thrush are in this category of birds particularly benefitting from old growth forests. The United States Geological Survey has also published work indicating that complex old growth forests are an important part of the continued survival of migratory songbirds in the face of increasing threats from climate change.

Thank you for considering our recommendations.

Sincerely,

Steve Holmer

Vice President of Policy

American Bird Conservancy

ATTACHMENT-LETTER TEXT: ABC NWFP Comment.pdf; This is the same content that is coded in text box; it was also included as an attachment

i https://abcbirds.org/bird/marbled-murrelet/#:~:text=The%20Marbled%20Murrelet%20flies%20as,lays%20the%20pair's%20single%20egg.

ii U.S. Fish and Wildlife Service. 2022. Initiation of 5-year status reviews for 167 species in Oregon, Washington, Idaho, Montana, California, Hawaii, Guam, and the Northern Mariana Islands. Federal Register 87:28031-28034. May 10, 2022.

iii https://abcbirds.org/bird/northern-spotted-owl/#:~:text=Northern%20Spotted%20Owls%20are%20very,hunting%20difficult%2C%20and%20forest%20fires.

iv Betts, M.G. et al. (2017). Old-growth forests buffer climate-sensitive bird populations from warming. Diversity and Distributions, 24(4). https://doi.org/10.1111/ddi.12688