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Comments: [Copied from attached letter]

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Meg,

Thank you for the opportunity to comment on the proposed FP amendments. As an organization, Conservation NW supports adaptive management and utilizing new information and best available science in the management of our National Forests. The 1989 Okanogan Forest Plan is over 30 years old and we know more now (from both experience and ongoing research) than we did 30 years ago.

We support the stated effort to maintain and restore Forest Plan Old Growth (FPOG) by enhancing resilience without degrading FPOG. We know from research that mixed conifer stands historically had low, mixed, and high severity fires. We also know that large and old trees are continuing to decline on the landscape. Therefore, management within FPOG must be done cautiously and thoughtfully.

The proposed amendment would allow for non-scheduled timber harvest to occur only if it does not degrade the FPOG with the expressed objective of enhancing resilience. Conservation NW supports this objective. However, it seems overly broad with very little specifics.

Here are some suggested ways to add more structure to the proposed amendment for FPOG standards and guideline (S&G).

5.1: "No scheduled timber harvest shall be permitted in mixed conifer old growth stands. Treatments in these stands will protect and enhance old-growth forest structure, function, and composition, and focus on restoring stand conditions that would be present if fire had not been excluded because of aggressive fire suppression. Materials generated by treatments in these stands may be sold as timber or commercial firewood when marked by the Forest Service"

This would generally be ingrowth from the last 80 years and the occasional tree under 18"dbh that may have been killed by a mixed severity fire. We propose marking by the Forest Service to prevent the loss of large snags or broken-topped trees by firewood cutters.

19-8: "Treatment of natural fuels shall protect and enhance old-growth forest structure, function, and composition, and other characteristics as described in the definition of "old growth stand"

This better reflects the goal of recognizing ecological objectives for these stands.

While the deer cover amendment seems reasonable and consistent with current science (regarding the critical role of adequate forage vs winter thermal cover), is this amendment ripe for decision? Recent wildfires on the Okanogan have created an abundance of forage. Meanwhile, hiding and thermal cover across the landscape have been reduced. Hiding cover will take several years to reestablish and forested thermal cover will take even longer to reestablish. There may be a benefit to temporarily carry a little higher canopy closure in areas not impacted by wildfire and address this S&G during a Forest Plan Revision process.

In principle, we understand and support the desire to manage for conditions that are characteristic for the landscape. At what level would this standard be applied? At too broad of a spatial scale, mere percentages would not address the need for spatial distribution.

We recognize these amendments would allow local line officers the ability to make decisions without a project specific FP amendment and would simplify and expedite the NEPA process. The public would still have opportunity for review and comment on site specific projects. We support the objective of these amendments to the degree that they expedite the pace and scale of landscape restoration and maintain or enhance critical habitats and connections across the landscape. We are concerned at the lack of specificity and detail and hope to see it addressed in the upcoming analysis.

Respectfully,

Mike Liu

Okanogan Lead - Conservation NW