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Comments: Dear Forest Service,

Thank you for accepting this scoping comment regarding the Forest Service's proposed amendment to the Northwest Forest Plan (NWFP). The forests and regions covered by the NWFP are vital to our region, providing cold, clean water for people, fish, and wildlife, recreation, climate change mitigation, wildlife and ecological services, and job opportunities.

In amending the NWFP, it is crucial that we ensure that these life-supporting ecosystem benefits continue on in our national forests, and that they remain a natural solution to climate change by absorbing and storing carbon. The following are some key considerations for any changes to the NFP.

It is concerning that the Forest Service seems to be using a rushed and abbreviated planning process for this amendment. This plan is important, and in order to maintain and strengthen its ecosystem-based conservation goals, the agency should use a transparent, science-based approach that includes and reflects public values, Tribal concerns, and the needs of future generations.
The NWFP was a visionary, first-of-its-kind landscape-level conservation plan designed to address destructive logging of public lands that has become a model for wildlife and forest conservation all over the world. The plan has begun to reverse environmental damage caused by decades of clearcutting carried out by the Forest Service. The NWFP created guardrails to protect important wildlife and environmental values from destructive logging and there is no compelling reason to remove those guardrails. Thus in some sense the NWFP has been highly successful in many respects. Now, with the global climate and biodiversity crisis, and its importance to protecting clean drinking water, its ecosystem protections should be strengthened not diminished.

The NWFP was originally based on mature and old-growth forests on both Forest Service and Bureau of Land Management Lands being protected under its reserve system. The Forest Service needs to expand and strengthen its own reserve system to compensate for the loss of habitat on BLM lands. The NWFP has had enormous co-benefits for clean drinking water, carbon sequestration and storage, and the recreation economy. By protecting riparian areas and late successional reserves from most logging, the plan reduced the amount of mud and sediment flowing into drinking watersheds. The general direction to conserve trees over 80 years old began to reverse the loss of old-growth to logging, which in turn has turned National Forests from a carbon source to a carbon sink. Improving environmental conditions on NWFP lands helps sustain economically valuable salmon runs, and plays a pivotal role in the quality of life and recreational opportunities that attract new people, jobs, and investment.

Amendments should focus on creating enforceable standards that ensure the protection of large trees and mature forests, water, and connected wildlife habitat. They should set the stage for the landscape-scale preservation of natural areas and restoration of ecosystems necessary to address the dual climate and biodiversity crises and help meet national land and water conservation goals. With these standards in place, the Forest Service can focus on real restoration of watersheds to return salmon to their native streams, connect habitats for species that need to migrate to adapt to climate change, and enhance degraded habitat.

President Biden's 2022 Executive Order gave the USFS clear guidance that it should prioritize the protection and restoration of mature and old-growth forests (trees generally over 80 years old) across the nation as a natural carbon and climate solution. The NWFP governs the largest natural carbon reserves found in North America and the amendment must prioritize increasing carbon storage.

To follow the direction of President Biden's Executive Order on Strengthening the Nation's Forests, Communities, and Local Economies, the amendments must:
oProtect all mature and old-growth forests and trees (80+) for carbon storage, fire resilience, wildlife habitat, and clean water.
oExpand the existing old-growth and conservation reserve network to address the joint climate and biodiversity crisis

The FS must enhance and strengthen the NWFP reserve network by protecting all unroaded areas larger than 1000 acres to provide for wildlife habitat needs. These areas are ecologically significant and rare on the landscape due to human activities that have degraded and fragmented the landscape. The reserve network should have clear and enforceable standards limiting logging and road building. The reserve network needs to remain spatially connected to facilitate dispersal of spotted owls and other wildlife, and must remain redundant to accommodate natural disturbance regimes.

It's important to take into consideration that mature forests are more resilient and resistant to fire. These forests should be protected, and diverse, resilient forests restored in areas that are currently dense, uniform plantations. Fuel reduction should be located near communities and focus on non-commercially treating small fuels. Logging commercially viable trees as fuel reduction tends to decrease a forests' resilience to fire by removing fire resistant trees, creating a drying affect, generating hazardous slash, making the stand hotter-drier-windier, stimulating the growth of surface and ladder fuels. Fuel and fire risk reduction "treatments" can have negative impacts on wildlife habitat and seldom result in actual risk reduction because fires don't often intersect with fuel reduction areas during conditions when such treatments are effective.

Furthermore, suitable spotted owl habitat must be protected from fuel reduction because the adverse trade-offs far outweigh the marginal benefits. Existing research finds that fuel reduction in westside forests is unlikely to mitigate fire effects in wind-driven fires (all large westside fires!). In addition, the heavy vegetation production of these mesic temperate rainforests make them quick to regrow fuels after fuel reduction treatments. The Forest Service cannot keep up with managing fuel regrowth in dry forests - it would be foolish to attempt similar management in wet forests.
Any NWFP amendments should increase ecosystem resilience to an uncertain climate by (1) reducing environmental stressors like logging, road building, invasive species, and off-road vehicles; (2) establishing connecting corridors for wildlife migrations; and (3) providing high-quality habitat as refugia for climate-sensitive fish, wildlife, and plants. Amendments should also prioritize safeguarding the vast amount of forest carbon that makes the region's National Forests critically important in fighting climate change.

The climate and biodiversity crises require the immediate retention and enhancement of carbon storage and habitat on our national forests. Short-term losses of carbon storage cannot be justified by hoped-for recruitment decades into the future, as we are currently at a global tipping point for atmospheric carbon. Long-lived forests are a great place to store carbon, while wood products are relatively short-lived and lose significant amounts of carbon in processing. All wood products represent net carbon emissions to the atmosphere, because only a small fraction of the carbon in logged forests ends up in long-term storage in wood products. In dry forests, any active management should ensure retention of medium and large trees that store the most carbon and provide the greatest ecosystem services.

All logging and thinning has a carbon cost from both removal of vegetation, disturbance of soils and the embodied fossil fuel use for road building, felling of trees, and transport of logged trees. This must be considered in analysis.

Any change to the NWFP should recognize the wide variety of social and economic benefits National Forests provide for local communities and the region as a whole, not just timber production. Outdoor recreation on public lands is a growing industry, employing more than 140,000 people. Every other industry benefits from the second-

paycheck provided by the high quality of life in the Pacific northwest. Logging shrinks that second-paycheck.

Preserving biodiversity and connected wildlife habitat across the region must be a core principle of any forest plan revision to ensure long term compliance with the Endangered Species Act. The Northern spotted owl faces a significant new threat in the form of the barred owl which has recently invaded the range of the spotted owl, prefers similar habitat, and uses many of the same food sources. Hundreds of thousands of acres of suitable owl habitat that were assumed in the NW Forest Plan to be available for spotted owl nesting, roosting, and foraging are now occupied and defended by territorial barred owls to the exclusion of spotted owls. There is an urgent need to protect additional suitable owl habitat (and reduce the loss of existing habitat) in order to increase the likelihood that threatened spotted owls can coexist with newly invading barred owls instead of facing competitive exclusion. More habitat increases the chances that the two owls can co-exist. Furthermore, habitat and other needs for species like Pacific fisher and red tree voles that are proposed but are not yet listed under the Endangered Species Act must be considered in the amendments.

Retention and strengthening of the Aquatic Conservation Strategy is critical for aquatic species and water resources. This includes strong ecological objectives, protective standards, and generous buffers for streams. Riparian reserves should retain clear and enforceable limits on logging. Key watersheds should receive enhanced protection to protect both aquatic and terrestrial biodiversity and ecological structures, functions, and processes.

The Forest Service should go beyond Tribal "engagement" and seek Tribal inclusion in the amendment process. Establishing good communication and trust with Indigenous communities takes time and, while it's good to see recognition by the Forest Service that the original Northwest Forest Plan was severely lacking by not meaningfully engaging the Tribes, the truncated process and shortened timeline for completing the Plan amendment may well undermine any current need and desire for meaningful inclusion. Full inclusion of Tribal representatives and Indigenous perspectives is vitally necessary to the success of the Plan amendment not only as a means of ensuring social and ecological sustainability, but as a matter of establishing justice.

Thank you for this opportunity to provide comments on the Forest Service's proposed climate-smart amendment to the Northwest Forest Plan.