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DATE: February 2, 2024

TO: Regional Foresters Jacqueline Buchanan and Jennifer Eberlien

RE: Comments on the Proposed Northwest Forest Plan Amendment

FROM: Diana Robinson, Board Member and Secretary, Friends of the White Salmon River

On behalf of the Friends of the White Salmon River (FWSR), we offer these comments in response to the Notice of Intent by the Forest Service (FS) to prepare an Environmental Impact Statement (EIS) to evaluate the effects of amending the Northwest Forest Plan (NWFP). That notice initiates a scoping period on a preliminary proposed action.

FWSR is a non-profit organization dedicated to protecting this 44-mile tributary of the Columbia River and its watershed through community engagement and action. In June of 2022, FWSR combined its resources with those of the Friends of Mt. Adams. This merger coalesced the missions of environmental protection of the watersheds in the northern half of the Gifford Pinchot National Forest.

The Forest Service (FS) uses six topic areas in proposing amendments to the NWFP. We have used these same six areas to organize our commentary below and would be happy to elaborate on any of these points. Many of our recommendations mirror those of Bark, an Oregon-based forest conservation organization whose primary focus is to defend and restore Mt. Hood and the Mt. Hood National Forest.

Climate Change. Reliance on fossil fuels is anticipated to bring about a range of impacts to northwest forests. There is little question that changes in forest type, coverage, and species composition will occur, but no guidance is provided in the NWFP for adaptively managing these changes. The EIS should evaluate alternatives for carbon storage management, such as thinning and no-touch management. Amendments should include alternatives for carbon storage management and assessment of those alternatives. We understand that the science on carbon storage in forests is not settled. This adds urgency to including carbon storage in the amendments. We also agree with Bark's call for climate refugia for sensitive plant and animal species, water capture and storage, and flood mitigation. The amendment should consider alternatives in shoreline and wetlands protection, aquifer recharge, and other stream and water management tools to maintain necessary stream flow and avoid flooding.

Tribal Inclusion. Diverse tribes have long shaped the ecosystems now managed by the Forest Service, yet their extensive traditional knowledge and perspectives are not reflected in the NWFP. Co-stewardship and co-management by the tribes and the Forest Service ensure that treaty rights are protected and prioritized in ways that include, but are not limited to:

- *Providing tribal access and forest and stream restoration in Landscape Scale Restoration and treaty areas,

- *Conserving culturally sensitive species,

- *Integrating traditional ecological knowledge into adaptive management practices, and

- *Managing recreation so that tribal cultural resources are protected.

Fire Resilience. Fire has long played a critical role across the northwest forest and will continue to do so well into the foreseeable future. Plan amendments must prioritize the protection of communities and shift policy away from full suppression of all fires. Fire ecology and promoting cultural and prescribed burning are needed to improve resilience to wildfire. These include sustained efforts to reintroduce beneficial fire to dry forest ecosystems while prohibiting burn practices that lack grounding in our understanding of fire and its role in the variety of forest types across the NWFP area.

Old Growth Management. Effectively managing old growth forests depends on whether the forest systems are dry or wet, the extent of carbon sequestration, and prescribed burning management. The NWFP was instrumental in protecting much of the remaining old-growth forests in our region and providing habitat for threatened and endangered species and other plants and animals associated with these forests. But not all of the remaining old-growth was protected. Amendments to the plan should also protect the remaining old growth forests and trees outside of reserves and grow, expand, and connect these vital ecosystems.

Communities. Community identity, culture, and economies throughout our region are linked to the forests managed under the NWFP. Amendments to the plan must recognize the social and economic changes that have occurred in the 30 years since the plan's creation and focus on building a workforce based on restoration and reciprocity. Opportunities to leverage economic, cultural, and social benefits through sound forest management go far beyond harvesting timber. Federal and state programs providing skills training, job placement, and small business opportunities can generate benefits that are felt across the NWFP region.

Biodiversity. Myriad species are endangered or threatened in the forests covered by the NWFP. Maintaining biodiversity in plants and animals has high priority. The EIS should evaluate alternatives for preserving species diversity across the varied ecosystems in the NWFP, including a do-nothing option for some areas of high sensitivity. The effects of burning or other adaptive management tools also may affect biodiversity. Maintaining habitat for biodiversity, such as safeguarding riparian and meadow ecosystems and migratory corridors, and protecting water quality and quantity (aquifer recharge and cold water refugia) can play a central role in restoring and protecting biodiversity, as may redefining the term "aquatic restoration" to include instream habitat for fish and managing recreation.

Our understanding is that the comments provided in response to this notice of intent will be used to prepare an environmental impact statement (EIS), a draft of which will be available in June of this year. We look forward to reviewing that draft in June and the final EIS in October of this year. Thank you again for this opportunity.