Data Submitted (UTC 11): 2/3/2024 4:30:53 AM
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Comments: Scoping Comments in Response to NOI on Amendment to the Northwest Forest Plan for Region 6
2/2/2024

To whom it may concern:

Thank you for this opportunity to submit the following comments:

1: "ACTIVE MANAGEMENT ": There are certain practices (called "active management") that should be acknowledged. These practices don't increase the integrity of NWFP Mature Old Growth Forests and other ecosystems in the Pacific Northwest. To the contrary, they lead to degradation of many for forest ecosystems and to compromised resilience to climate change. These should be mentioned even though many of these actions may be beyond the ability of the agencies to regulate. But their impact is cumulative and would delay the goals of the timeline of this plan (100 years.) These disturbances follow:

2. THE BELOW DISTURBANCES SHOULD BE AVOIDED IN ALL MATURE AND OLD GROWTH FORESTS BECAUSE THEY ARE OF MORE CONSEQUENCE TO FOREST ECOSYSTEMS THAN NATURAL DISTURBANCES ARE:

* All remaining mature and old-growth rests should be protected from logging AND the related threats below.
*Post-disturbance "salvage" and clearcut logging.
*Thinning and selective removal of large (>20 in dbh) trees
* Thinning that dries out understories, increases wind penetration within stands, and facilitates the spread of invasive species;
* Thinning that converts closed canopy forests to "park-like" open savannas;
* Thinning in spotted owl habitat.
*Pile burning that damages soil horizons and mycorrhizae connectivity, thereby facilitating weed invasions.
*Varying forms of logging/thinning for biomass utilization.
*All forms of road building, temporary or permanent
*ORVs, mining, and livestock grazing.

3. A CONSERVATION ALTERNATIVE IS NEEDED TO PROHIBIT LOGGING AND RELATED IMPACTS WITHIN MATURE OLD GROWTH FORESTS BY BUILDING ON THE NWFP RESERVES:

The above listed threats are typical within the Northwest Forest Plan area, leading to degradation of forest ecosystems and compromised resilience to climate change. They are much more consequential to forest ecosystems than natural disturbances, even though rates of logging have declined on federal lands under the NWFP.

The numerous threats to Mature and Old Growth and other NWFP ecosystems that cumulatively degrade integrity need to be acknowledged in the revision.

Eliminating these threats within Mature and Old Growth is the only actual way to reduce them, effectively and quickly. This is due largely to limitations regarding the agencies' ability to mitigate natural disturbance processes that are beyond the control of our agencies, (including the USFS) especially through the use of current and suggested management activities that are damaging to ecosystem processes.
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4. PLEASE DEVELOP AND ANALYZE A CONSERVATION ALTERNATIVE HAT BUILDS UPON AT LEAST THE FOLLOWING CORE ISSUES:

*Protecting all remaining Mature and Old Growth from logging in order to maintain climate and areas in which populations of organisms can survive through periods of unfavorable conditions.

*Greatly reducing cumulative environmental changes caused or influenced by people either directly or indirectly, such as logging, roads, invasive species, mining, ORVs, grazing, and so forth.)

*Judicious use of active management and natural wildfire ignitions compatible with ecosystem integrity.

We will increasingly need the Mature and Old Growth Forests in our rapidly changing climate, so they must be protected from logging by placing them within the reserve network. Rather than subtracting from the Plans, alternatives must build on the success story of the NWFP by adding protections and the reserves rather than subtracting from the Plans.

Acknowledge that there is a body of science that contradicts many assertions about natural disturbances being "threats."

*Every acre of MOG is irreplaceably important to the resilience and recovery of the entire ecosystem (i.e., context and importance of the federal lands are magnified by high rates of logging in the surroundings and needs to be part of the cumulative effects analysis).

5. PLEASE ANALYZE AND ACKNOWLEDGE IN THIS PLAN REVISION:

*Direct, indirect, and cumulative impacts of human disturbances during these three time intervals: 1) before the plan 2) during the plan 3) at the end of the plan's 100-year timeline from 1994.

* Acknowledge the uncertainties in such classifications as dry vs wet forests and do not overstate how much and where dry forests occur.

*High-intensity fire: Acknowledge the science presented by others commenting on this project that note that high-severity fire within Mature and Old Growth forests (both generally and within LSR's) are a natural ecosystem process that results in high levels of biodiversity with most of the carbon posture (98% of the carbon posture transferred from live to dead pools) and that even spotted owls are known to nest in fire refugia pockets and forage in high-severity patches in large burn complexes.

*Acknowledge that you cannot reduce fire spread rates, fire intensity, or even contain fires burning in extreme fire weather caused by human-caused climate factors that overwhelm on-the-ground efforts

*Affirm that active management that removes significant amounts of forest biomass to reduce fire spread rates, fire intensity, or contain fires will either be futile in these increasingly common conditions in the Pacific Northwest and/or will result in ecosystem type conversions to novel forest-climate associations.

*Acknowledge the paradigm shift in relationship to fire that is being increasingly called upon by the scientific community recognizing the futility of this effort.

*Acknowledge the statements of forest scientists responding to this NOI to the effect that thinning large trees does not reduce fire intensity, especially in extreme fire weather, and that attempting to reduce flame lengths by

taking out large, carbon-dense, wildlife valuable trees will result in type conversions t open weed infested areas and far more emissions than wildfires.

*Acknowledge that in accounting for tree mortality, the USFS also needs to account for tree mortality caused by thinning itself before it concludes any fire intersecting thinned areas resulted in reduced tree mortality.

*Acknowledge that uncertainties in Dry vs Wet forest distinctions can lead to inappropriate justification for lifting large tree protections (and may have done so already.)

Sincerely yours,
Isabelle Spohn