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Comments: Dear Ms. Jacque Buchanan, Regional Forester, USFS
As a plant ecologist I wish to comment on the USFS EIS for a proposed Northwest Forest Plan (NFP) amendment.
We need a regional approach to support the protection and enhancement of old growth forest ecosystems, with their fish and wildlife as integral parts, while also supporting local communities. Climate change is already impacting the PNW, and I encourage a modified Alternative B (B+) to recruit old forests better, burn dry forests, improve habitat connectivity, protect aquatic ecosystems, and restore old forests in Reserves.
Forests and their ecosystems provide excellent water quality to support our wildlife and communities, buffer peak storm events and winter storms, are crucial in hoping to survive climate impacts by acting as a buffer to large changes, contain a high native plant, animal, fungal and soil biodiversity, and provide relief to our lives in being beautiful and providing amazing recreational opportunities. ?
Since 1994, the NFP has improved watershed conditions and reduced threats to ancient forests and their inhabitants, including many very rare, unique species that occur only in the Pacific Northwest.
The proposed NFP amendment helps protect old-growth ecosystems, in part by restoring fire to the landscape, and improving ecological resilience of dry fire-prone forests. It also provides valuable direction to incorporate Indigenous Knowledge in decision-making and expand co-stewardship opportunities to better address Tribal cultural needs, achieve forest management goals, and meet indigenous treaty and trust responsibilities.
However, the proposed amendment needs improvement in five key areas. Please amend the proposed action with standards and guidelines that:
*Promote old-growth recovery in dry forests by recruiting enough trees from the largest and oldest size class during stewardship actions to restore old-growth distribution and abundance on the landscape. Older and larger trees are inordinately important for storing carbon, supporting biological diversity, and resisting stress from fire, drought, and other disturbances.
*Prioritize for ecological restoration of previously logged areas in wetter forests, especially in 80-120-year-old stands. Old plantations with homogenous structure and composition will benefit the most from actions that enhance structural complexity and other late-successional characteristics.
*Reduce road density to improve wildlife habitat connectivity and reduce aquatic impacts from climate-induced flood events. Reduce road density to 1 mile road/mile2 in key watersheds and to 2 miles of road/mile2 outside key watersheds and hydrologically decouple roads from water resources in all land allocations. Maintain the habitat connectivity emphasis in the Snoqualmie Pass Adaptive Management Area.
*Maximize wildland fire and indigenous cultural burning to restore ecologically appropriate fire activity and behavior across drier forest landscapes, and incorporate Indigenous cultural burning practices more broadly. Adopt plan components that support Tribes' co-management and co-stewardship informed by indigenous knowledge, access to cultural and religious sites, indigenous hunting and gathering on national forests, and other issues of interest to Tribes.
*Remove guideline 1(b) from FORSTW-LSR-GDL for creating young forest in Late-Successional Reserves. Natural disturbances are expected to continue to create suitable amounts of complex early successional forest habitat in Reserves and this guideline is unneeded.
Thank you for this opportunity to provide comments on the Forest Service's proposed amendment to the Northwest Forest Plan.
Sincerely,