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Comments: As someone who spends considerable time on USFS lands, I'm thankful for the chance to express my opinion concerning the amendments to the NW Forest Plan.

For 30 years, the Northwest Forest Plan (NWFP) has guided management of 17 national forests stretching from western Washington and Oregon south to northwestern California, and until 2016, governed the management of Bureau of Land Management (BLM) lands as well. While the original impetus for the plan was to curb the impacts of destructive logging on the northern spotted owl, the plan created standards that protected and accounted for a host of values provided by these landscapes, including habitat for a host of imperiled and unique species, watersheds that supplied communities, recreation, carbon storage and climate benefits, and commercial timber volume. This plan created stable jobs throughout the Pacific Northwest and supported many rural communities that would have otherwise vanished under the volatile boom and bust dynamics of the private timber industry.

The NWFP necessitated hiring landscape architects to account for the visual impacts logging would have on scenic corridors; arborists responsible for topping trees to restore nesting habitats, wildlife surveyors, biologists, silviculturists, fire scientists, burn crews, economists, recreation specialists, and fisheries experts. The plan has spawned and sustained numerous different fields of scientific research. The plan involved such sprawling complexity because the areas that it governs are vast and diverse and the values these landscapes serve are similarly complex.

But despite its lofty goals and far reach, the plan had serious shortcomings. Most notably was the U.S. Forest Service's exclusion of Tribal Nations in the development of the plan and failure to incorporate Indigenous Knowledge and stewardship practices. I support Tribal Inclusion.

The NWFP also permitted the logging of old-growth forests, a practice which now has clearly lost any prior social or ecological license. These older forest areas are prized by recreationists and not only provide essential habitat for imperiled species and safeguard our region's water sources, but also mitigate severe climate and fire effects. The scientific research that was conducted by the Forest Service throughout the life of the NWFP ultimately concluded that the logging of old growth no longer holds any scientific value.

Additionally, the NWFP is three decades old. It does not account for climate change, associated ecological changes and changing fire patterns, issues that have emerged as essential to sound forest management in the region for the safety and sustainability of our communities. Current Forest Service timber sale projects analyze each of these issues under existing NEPA documents, but these issues warrant relevant standards and guidelines based on the best available science to properly guide forest management.

In amending the NWFP, the Forest Service should honor the first principles that undergirded the 1994 Plan-scientifically sound, ecologically credible, and legally responsible-and avoid controversies that threaten gridlock in the region.

The Klamath-Siskiyou Ecoregion is Not Adequately Acknowledged or Analyzed
The Klamath-Siskiyou Ecoregion is not adequately represented in the analysis for the amendments to the Northwest Forest Plan. The analysis separates forests into only two distinct forest types: moist forests and dry forests. This simplification of forest types as represented by moist, west-side Douglas fir forests, and dry, east-side ponderosa pine forests, are not representative of the extremely complex, botanically diverse, enriched conifer forests of the Klamath-Siskiyou Ecoregion.

The Forests of the Klamath-Siskiyou Ecoregion Are Not Simply Moist or Dry
Each watershed in the Klamath-Siskiyou Ecoregion can have moist, dry and gradations of both moist and dry in the areas in between. It is common for the steep canyon bottoms to have moist forests, and then as you go up into the mid-elevations, the ridgetops can have some dry forests, and then at high elevations, in the montane, subalpine or alpine zones, there are moist forests again.

The high elevations in the Klamath-Siskiyou Ecoregion, including the Siskiyou Crest, have moist montane and subalpine forests that operate completely different than the dry east-side ponderosa pine forests, and yet they are still classified as dry forests in the analysis for the amendments to the Northwest Forest Plan. All high elevations, above 5,000' elevation, in general, in the Klamath-Siskiyou Ecoregion, the forests are moist or montane. We ask that all forests above 5,000' in the Klamath-Siskiyou Ecoregion be classified as moist forests.

The Klamath-Siskiyou Ecoregion Has Its Own Mixed-Severity Fire Regime
The Klamath-Siskiyou Ecoregion has its own mixed-severity fire regime that is not adequately analyzed or acknowledged in the analysis for the amendments to the Northwest Forest Plan.

The amendments to the Northwest Forest Plan should analyze more categories of fire regime than just two regimes: high severity and low severity. The mixed-severity fire regime of the Klamath-Siskiyou Ecoregion is completely unanalyzed, and this lack of analysis affects the rest of the forest management recommendations by skewing the fire analysis in the Klamath-Siskiyou Ecoregion into a fire regime that is not applicable to this area.

The Klamath-Siskiyou Ecoregion has 35 species of conifer, and 200-plus species of trees in general; however, the analysis for the amendments to the Northwest Forest Plan simply lump this complex and unique ecosystem into the simplified, non-diverse forests east of the Cascades. The diverse forests of the Klamath-Siskiyou Ecoregion operate on an entirely different fire regime, especially due to the extreme topographical relief which creates terrain-driven fire effects and encourages smoke inversions that reduce fire severity.

With the incredible botanical diversity of the Klamath-Siskiyou Ecoregion, fire regimes vary from watershed to watershed as the flora and species assemblages change, all with their own, unique interactions with wildfire.

Focus Non-Commercial Fuel Reduction Close to Homes and Communities
I believe fire resilience could be improved by focusing non-commercial fuel reduction near homes and communities, while retaining fire resilient older forests in the backcountry setting, eliminating timber quotas, and when conditions allow, managing wildfire ignitions to create more intact fire regimes.

Backcountry logging and fuels work far from homes and communities does not improve the fire resilience of homes and communities, and does not help communities meet their firewise objectives. Rural communities need help close to communities, and the backcountry work, far from homes, just takes resources and funding sources away from rural communities.

Dry Forests Should Have a Logging Diameter Limit of 21" DBH
The dry forests of southwest Oregon should be given the same diameter limit for logging of large trees as the dry forests of eastern Oregon: 21" DBH.

No Salvage Logging
Scientific research shows that salvage logging has massive, negative impacts on the environment, and it does not pan out well economically. Salvage logging should be excluded in dry forests, just as it is in moist forests in the proposed aments to the Northwest Forest Plan. Salvage logging should be prohibited in all Late Successional Reserve forests.

Keep the 80-year Age Limit for Logging

The analysis for the amendments to the Northwest Forest Plan proposes the arbitrary age of 120 years as the limit for logging in Late Successional Reserve (LSR) moist forests, and 150 years as the limit for logging in dry forests. We believe that these numbers are arbitrary and do not reflect the value of mature and old-growth forests.

I ask that the Forest Service keep the 80-year age limit protecting trees and stands that are more fire resilient and will more quickly turn into old-growth forests. The Northwest Forest Plan Amendment should strengthen, not weaken forest protections, incorporate climate science and the need to more effectively store carbon by protecting forests and trees.

Northern Spotted Owls Use Burned Areas for Foraging
Scientific research has shown that northern spotted owls will use areas that have burned in wildfires for post-fire foraging, even in high severity burn patches. The Forest Service's analysis in the DEIS makes a baseless assumption that burned areas equate to a loss of habitat for northern spotted owls, but this assumption is wrong. Many acres burned in wildfires are still important habitat for northern spotted owls.

The Northwest Forest Plan Should Focus on Conservation and Protection
The Northwest Forest Plan could be positively amended, but the new amendments should focus on encouraging forest conservation and protection measures that support a healthy environment, protect endangered species, support natural climate solutions, and maintain and/or restore habitat connectivity.

Sincerely,

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