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Organization:

Title:

Comments: Regional Forester, Pacific Northwest Region, and Comment Reviewers (bless your hearts!):

I am submitting these comments due to my concern about the changes that will be made to the Northwest Forest Plan (NWFP) by this amendment, which will amend all the plans of Forests in the Pacific Northwest Region. I worked in Region 6 a wildlife biologist for 30 years, the last 12 as the Regional Threatened, Endangered and Sensitive Species Program Leader. I was also involved in the Survey and Manage Program. I saw how the Northwest Forest Plan dramatically improved management to more fully address the needs of listed and sensitive species.

If there are any changes to be made to the NWFP in this amendment, they should be to improve protection of old-growth forests and forests that will mature into old-growth, manage younger forests in Late Successional Reserves toward old-growth forest structure, and address effects of climate change and management actions that should be taken to alleviate its effects on both forests and wildlife.

The definition of old forests should not be changed to only those stands greater than 120 years of age.

Retain Late Successional Reserves and Riparian Reserves and all management direction pertaining to listed species such as the marbled murrelet, spotted owl, and salmonids.

Adequate early forest habitat exists without creating more. I would like to see specific research that indicated creation of this habitat should be a high priority in the NWFP area. The species dependent upon this type of habitat are not threatened or endangered, as are the marbled murrelet, spotted owl, and salmonids.

Review the species protected by the Survey & Manage program, and revise management direction as needed based on what has been learned about these species from research and management over the past 30 years.

Retain all Eastside Screens, and the 20 inch diameter limit. Improve protections for old-growth ponderosa pine. If measures to manage stands to move toward old ponderosa pine forests, include clear and enforceable standards to retain all ponderosa pine greater than 20" dbh. Also allow for measures to protect and manage younger ponderosa pine stands to move toward old-growth characteristics.

The NWFP made Region 6 a leader in conservation with its revolutionary approach to forest management. Certainly it can be improved given monitoring results and new research. However, it should in no way be compromised by misguided and outmoded notions that timber production should be increased by logging the limited acres of old-growth forests that still exist.

Thank you for this opportunity to provide comments on the NWFP amendment.

Sincerely,

Sarah J. Madsen
Retired Wildlife Biologist
U.S. Forest Service
Pacific Northwest Region

