



# *Spokane Audubon Society*

*“Advocating for birds and their habitats in the Inland Northwest  
and connecting people with nature.”*

DATE: February 2, 2024

RE: Northwest Forest Plan Amendment – scoping comments

Dear Forest Service:

We are submitting these comments in response to the Notice of Intent to amend the Northwest Forest Plan (NWFP) as part of public scoping. This comment letter is submitted on behalf of Spokane Audubon Society.

Instead of weakening the NWFP, we ask that its successes be enhanced and built upon. These include: (1) Protecting all remaining mature ( $\geq 80$  years old) and old growth ( $\geq 200$  years old) trees, herein referred to as MOG, on Federal lands including those remaining following natural disturbances such as fire.

(2) Increasing conservation plans for spotted owls

(3) Adopting species of conservation concern, similar to those included in the Survey and Manage component of the original NWFP

(4) Adopt beaver restoration as a goal of the plan

**Retain the Core Components of the Northwest Forest Plan.** The Northwest Forest Plan has been a tremendous success in reducing the rate of habitat loss, restoring watersheds, and reversing the flow of carbon from the forest to the atmosphere. The plan was designed to guide a 100- to 200-year forest recovery period. The plan’s reserves were designed to be redundant and durable in the face of natural disturbance like wildfire. The plan allows active management within every land allocation—even in reserves—but also includes standards to help ensure that logging is both necessary and effective in meeting the goals for the reserves. We believe these protections need to continue to be implemented and not weakened.

Enhancements to the Northwest Forest Plan need to include:

- A reserve system that accommodates natural disturbance to create a functional, interconnected late-successional ecosystem to support biodiversity. This reserve network needs to have clear and enforceable standards limiting logging and road building. The reserve network needs to remain connected (i.e. not fragmented), in order to foster the dispersal of spotted owls and other wildlife
- Protections for species of conservation concern, with an emphasis on those with limited mobility, are sensitive to disturbance, and those most sensitive to the effects of climate change
- An overall biodiversity strategy that contributes to recovery of Endangered Species Act listed species, maintains viability of wildlife populations, and avoids the need for additional listings

- A natural disturbance/fire policy that is science-based, ecosystem-centered, and tolerant of characteristic natural processes, recognizing that natural disturbances such as fire are “essential for the development and maintenance of late-successional and old-growth forest ecosystems.”<sup>1</sup>

A core purpose of the NWFP was to conserve biodiversity, and this purpose must be preserved.

We are concerned that the Forest Service is seeking to give pro-logging managers more discretion to cut trees, especially MOG and trees in reserves. The benefits of logging, such as to aid in suppressing mega-fires are overestimated. Logging has complex effects on wildfire risk. In many cases logging can make fires more destructive instead of less. For instance, removing medium and large trees reduces the forest canopy and makes the forest hotter and dryer. Removing canopy trees also stimulates the growth of highly flammable brush and grasses that can spread fire quickly through the landscape. Fire mitigation needs to include an end to clearcutting and heavy thinning that produces hazardous fuel conditions, retain MOG forests that are relatively fire resistant and resilient, and modify fire suppression policies to let more fires burn when weather conditions are appropriate so that fires can do their ecological work.

The management response to fuel management must be careful and calibrated. Western forests evolved with fire. Mature and old-growth forests are relatively more resistant and resilient to wildfire, compared to managed forests. Wildfires do important ecological work to maintain and diversify forests. There is no compelling evidence that mature and old-growth forest ecosystems receive net benefits from commercial logging to reduce fuels. The best evidence is that the spotted owl and other wildlife would fare better under the influence of wildfire, than under the combined effects of logging plus wildfire.

The Forest Service needs to de-emphasize commercial logging and use a more diverse set of tools to meet its management objectives. Cutting down any MOG and replacing it with young trees is damaging to the fragile late seral reserve ecosystem and violates the intention of President Biden’s Executive Order 14072 to conserve MOG.

**Spotted Owls and Barred Owls.** Although barred owl invasion and climate change were known issues when the plan was adopted, the magnitude of these stressors may not have been fully anticipated or accounted for in the plan. Any amendment made to the NWFP needs to increase conservation requirements, not reduce them. The spotted owl needs more suitable habitat to increase the chances of coexistence with the barred owl. There is evidence that the two owls are most tolerant of each other where late successional habitat is of the highest quality. An aggressive program of thinning and fuel reduction may create a landscape more suitable for barred owls than spotted owls. Any large-scale removal of barred owls does not in any way reduce the need for owl habitat conservation and restoration. In addition, other declining bird species associated with MOG such as Varied thrush, Townsend’s warbler, and Pacific slope flycatchers will benefit from MOG preservation and restoration<sup>2</sup>. **All remaining old growth and mature closed canopy forests need to be retained, and restoration of such late seral stage habitats for spotted owls needs to be given priority.**

## **Adopting Species of Conservation Concern**

The Survey and Manage program in the original NWFP greatly increased data and knowledge of lesser-known species associated with mature and late successional forests such as terrestrial mollusks, red tree voles, and salamanders. However, the Survey and Manage program was weakened in the early 2000's. We support implementing a similar program that would create protections to conserve "species of conservation concern". We urge the Forest Service to commit to a transparent and scientifically-rigorous process to determine species of conservation concern and to commit to a robust monitoring program to ensure long-term species viability. Species should be selected based mainly on viability criteria with emphasis given to those with limited dispersal, sensitivity to management impacts, and climate change. Implementing such a program would fulfill the obligation set forth in the 2012 Planning Rule to create "fine filter" protections to conserve "species of conservation concern". Here, the Forest Service has an obligation to ensure that either existing plan components are sufficient to "maintain a viable population of each species of conservation concern within the plan area" or, "If the responsible official determines that the plan components...are insufficient to provide such ecological conditions, then additional, species-specific plan components, including standards or guidelines, must be included in the plan to provide such ecological conditions in the plan area."

## **Beaver Restoration**

Beavers are a keystone species capable of producing complex aquatic ecosystems vital to the restoration of the Pacific Northwest's salmon fisheries and aquatic ecosystems. Beavers help to recharge groundwater, moderate fire behavior and create fire refugia, improve water quality, and recharge and connect floodplains. The economic benefit of ecosystem services provided by beavers has been estimated in the billions<sup>3</sup>. However, beavers are either missing from their historic range or are vulnerable to being taken by trappers throughout the Plan area. Amendments to the Northwest Forest Plan should explicitly provide for beaver restoration at scale.

Sincerely,

Shenandoah Marr, M.S.

Conservation Coordinator

Spokane Audubon Society

References:

<sup>1</sup>Record of Decision for Amendments to Forest Service and Bureau of Land Management Planning Documents Within the Range of the Northern Spotted Owl

<sup>2</sup>Impacts of the Northwest Forest Plan on forest composition and bird populations. Phalan, Benjamin T., J.M. Northrup, Z. Yang, R.L. Deal, J.S. Rousseau, T.A. Spies, and M.G. Betts. 2019. Proceedings of the National Academy of Science 116 (8) 3322-3327

<sup>3</sup>Niemi, E., S. Fouty, S. Trask (2020) Economic Benefits of Beaver-Created and Maintained Habitat and Resulting Ecosystem Services. Sloverbrigade.com