

**Cascade Chapter, Sierra Club – Conservation Northwest
Gifford Pinchot Task Force – Lands Council – Mountaineers
North Cascades Conservation Council – Olympic Forest Coalition
Pacific Rivers Council – Pilchuck Audubon Society
The Wilderness Society – Washington Wilderness Coalition**

May 20, 2009

Senator Patty Murray
Senator Maria Cantwell
Representative Jay Inslee
Representative Rick Larsen
Representative Brian Baird
Representative Doc Hastings
Representative Cathy McMorris
Representative Norm Dicks
Representative Jim McDermott
Representative Dave Reichert
Representative Adam Smith

Dear Honorable Members of our Washington State Congressional Delegation:

Climate change is the most complicated and difficult environmental issue we face. One important mitigation effort we can take now in the Pacific Northwest is to protect old growth and mature forests and their globally significant carbon stores.

The conservation community has come together to develop a *Vision to Protect and Restore National Forests in Washington State*, which we are pleased to enclose.

First and foremost, we call for the establishment of a Pacific Northwest Forest Climate Reserve to safeguard the carbon storage and other ecosystem services in our ancient forests. We also identify a variety of actions the federal government can take to both protect and restore our forest and aquatic ecosystems, including ways to provide sustainable jobs for the future.

We hope you will have an opportunity to read our vision statement and policy recommendations. We look forward to working with you in future months and years to meet the challenges of climate change in the 21st century.

Sincerely,

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cc: Governor Chris Gregoire/John Mankowski
Mary Wagner, Regional Forester, Region 6, U.S. Forest Service
Forest Supervisors, Washington State National Forests

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**CONSERVATIONISTS' VISION TO PROTECT AND RESTORE
NATIONAL FORESTS IN WASHINGTON STATE**

The old growth and mature forests of the Pacific Northwest are world champions in carbon storage. They hold more carbon per acre than any other forest ecosystem on earth,ⁱ retain and continue to increase their carbon stores for centuries,ⁱⁱ and therefore play a pivotal role in long-term carbon sequestration and climate change mitigation. At the same time, climate change greatly exacerbates problems and risks caused by decades of intensive logging, road building, overgrazing, and fire suppression.

In the face of climate change, it is even more critical to safeguard the extraordinarily valuable ecosystem services provided by forests—including clean drinking water for communities, clean air, wildlife and fisheries, flood control, regulating water flows, carbon sequestration, wilderness, and unparalleled recreation opportunities. An investment in restoration projects on our national forests provides a great opportunity for job creation that can build the American workforce and increase economic activity, particularly in rural communities.

We support a two-part forest policy response to the threat of global warming. First, we must protect and keep connected the remaining intact forests and watersheds in our national forests, including old growth and mature forests, roadless areas, old and mature trees in younger stands, and early seral, unlogged natural stands. The region's extremely valuable forest carbon stores and highly functioning ecosystems are an essential part of our nation's strategy to mitigate the impacts of global warming. Furthermore, keeping these areas connected at all spatial scales will allow organisms to avoid extinction by moving to more favorable climates and microclimates during climate change. The best way to provide connectivity at a regional scale is to maintain intact networks of protected lands, for example along the Cascades (at all elevations) and from the Cascades to the Rockies.

Second, we must develop and implement strategies that restore the natural ecological resilience of forest ecosystems so they are better able to adapt to the stresses of global warming. The threats to forests from global warming – and the appropriate management strategies to combat those threats – differ somewhat between the relatively wet forests west of the Cascade Crest and the drier forests on the east side of the Cascades.

On national forests statewide, a vital restoration need is to reduce the harmful cumulative impacts of damaging logging roads and climate change on watersheds, streams, water quality, and fish habitat. One of the most devastating effects of climate change in this region is the increasing intensity of winter rain storms. High-intensity storms hitting the

steep and densely-roaded slopes result in landslides, plugged road culverts, and accelerated runoff, more often culminating in floods that wreak environmental and economic havoc far downstream. Watershed restoration through road and culvert remediation is essential to the long-term recovery of endangered salmon, steelhead, and trout populations in many rivers and estuaries, including the magnificent Puget Sound.

Road decommissioning and upgrades create family wage jobs for heavy equipment operators and other forest workers—while enhancing water quality, improving public safety, and reducing fire ignitions. Every winter that passes without addressing the crumbling road system increases the risk of catastrophic road failure and sky-rocketing repair costs.

Global warming is causing hotter, drier summers and lengthening the duration of fire seasons. In the relatively dry forests east of the Cascades, variable, relatively frequent fire is natural and essential. However, changing climate, past logging of fire-resistant old-growth pines, decades of fire suppression, and other factors such as overgrazing have combined to increase the extent of dense, young stands on many sites. The best available science should guide restoration of healthy, sustainable terrestrial and aquatic ecosystems in these eastside forests, and harmful management practices such as post-fire salvage logging should be discontinued. Climate change impacts in both eastside and westside forests should be carefully monitored.

POLICY RECOMMENDATIONS

I. Establish a Pacific Northwest Forest Climate Reserve

The old growth and mature forests of the Pacific Northwest store more carbon per acre than any other forest ecosystem on earth and therefore play a pivotal role in protecting the planet from the harmful impacts of global warming. The U.S. government should do all that it can to ensure that this extremely valuable resource is protected from commercial exploitation and destruction.

The Pacific Northwest's old-growth and mature forests on federal lands should be designated a Forest Climate Reserve to protect their globally-significant forest carbon resource. Encompassing the region's national forests, national parks, wilderness areas, and other federal lands, the old-growth and mature forests in the Climate Reserve should be managed for long-term carbon sequestration and climate change mitigation.ⁱⁱⁱ Ideally, the Reserve should be designated by an act of Congress to ensure enduring protection, but the designation could also be accomplished through a presidential Executive Order, federal regulation, or other administrative action. The Pacific Northwest Forest Climate Reserve will serve as a model for other nations to conserve their forest carbon stores, reduce forest land conversion, and manage their forests in a more ecologically sustainable and carbon-friendly way.

II. Protect Large, Mature, and Old-growth Forests and Trees on Federal Lands

Through legislation, Executive Order, or directive, the federal government should prohibit logging (including salvage logging) of mature and old-growth forests and large and old trees on federal lands. Full protection of these forests will appropriately recognize the significant role they play in maintaining and increasing forest resiliency against natural disturbances, providing critical habitat and core species refugia, regulating water quality and flows, providing crucial genetic diversity, and contributing to carbon sequestration and storage.

III. Restore Protections for Roadless Wild Forests

Roadless areas deserve protection because they benefit local communities, provide world class recreational opportunities, provide essential habitat for endangered species, and are a large part of the quality of life we all enjoy here in the Pacific Northwest. Roadless areas also play a key role in our nation's defense against the impacts of global climate change. They act as an environmental insurance policy, providing the last best hope to keep ecosystems intact. During the coming decades, wildlife will need intact migration corridors in order to survive climate change. Roadless forests are more naturally resilient to wildfires, which are expected to become more frequent as annual fire seasons lengthen. Roadless watersheds will ease the aquatic impacts of intense storms and rain-on-snow events -- such as increased flooding, landslides, and fish habitat destruction -- that are likely to result from climate change.

The following steps need to be taken to restore protections for our nation's roadless areas:

- Uphold the 2001 Roadless Area Conservation Rule that protects our last undeveloped national forests, through legislative, administrative, or court actions .
- Issue an immediate temporary moratorium on road-building and commercial logging in all inventoried roadless areas until the rule can be fully implemented.

IV. Reinstate Strong Ecosystem Protections through Forest Planning Regulations

Forest plans developed with robust public involvement and the use of sound science and conservation planning principles are critical for ensuring effective, efficient, sustainable and legitimate management of federal public lands in the Northwest in the face of climate change and other conservation planning challenges. The National Forest Management Act (NFMA) established the process for developing individual forest plans, provided for public participation in the development and review of plans, and also required Forest Service managers to “maintain viable populations” of fish and wildlife. The Bush administration pursued controversial changes to the 1982 NFMA planning rule that severely limited public involvement by truncating the National Environmental Policy Act (NEPA), weakened the application of sound science to planning, and eviscerated the longstanding Forest Service obligation to maintain, evaluate and monitor fish and wildlife populations.

Reinstatement of the 1982 planning rule is an essential first step in restoring public engagement, science-based planning principles, legitimacy and trust to the management of federal public lands in the Northwest. However, the 1982 planning rule was not designed with climate change challenges in mind. Forest Service planning should be modernized to employ state-of-the-art conservation planning tools that allow for greater effectiveness and efficiency in achieving species and ecosystem objectives, and expanded to allow for cross-jurisdictional conservation planning at spatial and temporal scales to effectively maintain wildlife habitat connectivity across forests and to allow species and ecosystem adaptation to climate change.

V. Retain and Improve Northwest Forest Plan (NWFP) Protections

The Northwest Forest Plan was created using an innovative, scientifically sound approach to ecosystem and watershed management on lands within the range of the northern spotted owl. The NWFP was and remains one of the most forward-thinking land management plans in the nation. Its multiple goals included collaborative decision-making processes, adaptive management to allow for new scientific information, and the restoration and conservation of Northwest forest ecosystems in concert with supporting sustainable rural economies.

The greatest challenge and highest priority now is to ensure that the NWFP's sound goals are maintained and enhanced to ensure the resiliency of forested ecosystems. Recent attempts under the Bush administration to increase the amount of timber cut from Northwest federal forests have compromised protections for salmon, clean water, and old-growth forest ecosystems under the NWFP by eliminating critical habitat in the matrix lands, drastically

reducing stream protections, and other rollbacks. Furthermore, the Northern Spotted Owl Recovery Plan, which failed independent scientific peer review, provides up to 56% less habitat in Managed Owl Conservation Areas compared to the NWFP's Late-Successional Reserves (LSRs) because many of the LSRs were excluded from recovery goals and are therefore vulnerable to logging.

The federal government should take the following actions:

- Reinstatement protections for mature and old-growth habitat and associated species on the 24.5 million acres covered by the Northwest Forest Plan.
- Retain and expand the 1994 Northwest Forest Plan reserve system to include all mature and old-growth forests. The reserve system was intended to develop over the long term into a robust landscape of late-successional and aquatic habitats for threatened, endangered, and sensitive plant, animal, and fish species. Salvage logging should not be allowed in the reserves.
- Suspend implementation of all changes to the Northwest Forest Plan that occurred under the Bush administration, including the Western Oregon Plan Revision, which significantly undermines the reserve system and aquatic conservation.
- Issue a revised Environmental Impact Statement and Record of Decision for Survey and Manage provisions of the Northwest Forest Plan that also addresses annual species reviews.
- Stop implementation of the Final Northern Spotted Owl Critical Habitat designation and related final Northern Spotted Owl Recovery Plan and revise them in response to the scientific peer review ignored by the US Fish and Wildlife Service (USFWS). Direct USFWS to use the NWFP late-successional reserves as a habitat baseline for owl recovery as recommended by peer review. During this process, continue to implement the NWFP and Northern Spotted Owl Recovery Action 32 to maintain all older and structurally complex conifer forests on federal lands in the range of the northern spotted owl as well as barred owl science efforts

VI. Increase Funding for Watershed Restoration

Chronic underfunding for protecting and restoring irreplaceable environmental services -- including clean water, biodiversity, wildlife habitat, erosion and flood control, nutrient cycling, and soil formation -- has severely impeded the ability of the Forest Service to effectively carry out its mission. Adequate funding for these activities is especially critical to maximize fish and wildlife adaptation in the face of climate change. Road decommissioning and other remediation activities, done in a strategic, prioritized manner, will significantly improve water quality and fish habitat, reduce fragmentation of fish and wildlife habitat, and aid in restoring stability and resilience to watersheds and large tracts of forests. Washington State's national forest roads require at least a \$300 million investment to meet minimum water quality goals. Watershed restoration funding will also generate significant employment opportunities and economic benefits for rural communities.

- Increase funding to reduce and eliminate the impacts of Forest Service roads through the Legacy Roads and Trails Remediation Initiative, economic stimulus legislation, the Highway Trust Fund, regular annual appropriations, and other funding sources.

Funds should go to plan and implement projects in watersheds most urgently in need of road decommissioning, road and trail repair and maintenance, and removal of fish passage barriers that pose an active threat to clean water, threatened and endangered fish and wildlife, and the safety of recreational users of forest roads. Funds should also be used for monitoring of implemented projects to ensure that they are effective and to improve the design of future projects.

- Increase funding for other restoration activities, especially fish and wildlife habitat restoration, in order to restore watershed integrity and increase adaptability and resilience to mitigate the impacts of climate change and create local jobs.
- Create a Watershed Restoration Job Corps that directly creates jobs and spurs training and investment in restoration-related businesses.
- Significantly reduce road densities, including temporary roads, in watersheds and prioritize decommissioning roads that have notable aquatic and wildlife impacts.
- Discourage all new road construction, temporary or otherwise.

VII. Protect Public Lands from Off-Road Vehicle (ORV) Damage

The Forest Service has indicated that unmanaged off-road vehicle travel is one of the four largest threats to the National Forest System, harming streams, disturbing wildlife, fragmenting habitat, and spreading noxious weeds – especially in roadless areas. To address this threat, the 2005 travel planning rule mandates an end to almost all cross-country travel by off-road vehicles and requires that all national forests designate which routes are open to motorized use. This process is due to be completed on each national forest by the end of 2009. The federal government should ensure that the national forests in Washington State use this process to address the management problem by not designating user-created unauthorized routes, and by designating motorized routes that are safe, reasonable and appropriate to mitigate the threat which is the focus of the rule.

VIII. Maximize Agency Wilderness Recommendations in Forest Plan Revisions

For the first time in three decades, the Forest Service will be required to recommend wilderness areas for designation to the U.S. Congress as part of their forest plan revisions. Individual roadless areas in each forest will be evaluated for their wilderness character. The public process associated with the plan revision will be critical input toward ultimately which and how many areas are recommended. The Forest Service should recommend wilderness designation for all areas that have wilderness qualities and receive broad public support.

IX. Support Local Wilderness and Wild & Scenic River Designations

With the successful passage of Wild Sky Wilderness Act in 2008, there is growing interest in local citizen wilderness proposals throughout the state. In addition, designations under the Wild & Scenic River Act have garnered growing interest in Washington State as a complementary conservation tool to wilderness and other designations. As the local politics,

public support, and interest from Congressional champions build for these efforts, they should be endorsed by the Administration and enacted by Congress.

X. Land and Water Conservation Fund (LWCF)

Ensuring connectivity of forests will allow for better forest restoration and coordination activities while in the long-term providing sufficient habitat linkages to allow for wildlife to adapt to different habitat conditions that result from climate change. Acquisition of critical inholdings protects fish and wildlife habitat from forest fragmentation and can abate the future costs of protecting residential developments from the soaring costs of suppressing wildfire.

The federal government should reverse the recent decline in LWCF funding, the largest source of land acquisition funding for the U.S. Forest Service. LWCF funding has long been used to protect the nation's most significant wildlife habitats and forested areas. This key tool can promote ecosystem services and abate threats of forest fragmentation, soaring fire suppression costs, watershed degradation, and climate change.

ⁱ Smithwick et al. Potential upper bounds of carbon stores in forests of the Pacific Northwest. *Ecological Applications* 12, 1303-1317 (2002).

ⁱⁱ Luysaert et al. Old-growth forests as global carbon sinks. *Nature* 455, 213-215 (2008)

ⁱⁱⁱ Currently the vast majority of the remaining Northwest old growth and mature forests are on federal lands and most of them are legally protected through a variety of administrative and legislative designations. These include Northwest Forest Plan Late Successional Reserves and Riparian Reserves, other administratively protected forests, Wilderness Areas, and National Parks. Approximately 80% of the Westside late-successional forests (i.e. located within the range of the Northern Spotted Owl) are protected (FEMAT 1993). However, approximately 1.7 million acres of these late-successional forests are not protected and therefore are vulnerable to destructive logging. In addition, significant acreages of old growth and mature forests located east of the Cascades are either unprotected or temporarily protected from logging.