

# CCPLA



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Regional Forester  
US Forest Service  
1220 SW 3<sup>rd</sup> Avenue  
Portland, OR 97204

Dear Sir or Madam,

Curry Citizens for Public Land Access provides the following comments for the **Northwest Forest Plan Amendment, 12/18/2023**. The purpose of our group is to ensure the protection of access to public lands, by all forms of both motorized and non-motorized means, for recreation and other uses. Our membership represents a very broad and diverse group with varied interests, but we come together in our quest to maintain access to public land for current and future generations.

### **Background Information**

*Purpose.* The purpose of the proposed action is to amend the NWFP to establish new or modify existing plan components for 17 affected national forests to better enable the agency to meet the original intent of the NWFP to conserve mature and old-growth ecosystems and habitat for the NSO and other species, protect riparian areas and waters, and provide a sustainable supply of timber and non-timber forest products. Amending the NWFP will provide an opportunity for the Forest Service to incorporate findings from the Bioregional Assessment, the Science Synthesis and supplements, which identify changed conditions across the NWFP area since it was approved in 1994, and to incorporate new information relevant to the NWFP including monitoring reports.

*Need to Change.* In preparing an amendment to the NWFP, the responsible official shall base an amendment on a preliminary identification of the need to change the plan ([36 CFR 219.13\(a\)\(1\)](#)). The preliminary need to change documents the issues identified by the agency through public and Tribal engagement, the Science Synthesis, Bioregional Assessment and new information

described above, as well as issues identified by its partners and consideration by the NWFP Federal Advisory Committee (NWFP FAC).

The preliminary need to change focuses on five interrelated topic areas, including:

- Improving fire resistance and resilience across the NWFP planning area,
- Strengthening the capacity of NWFP ecosystems to adapt to the ongoing effects of climate change,
- Improving conservation and recruitment of mature and old-growth forest conditions, ensuring adequate habitat for species dependent upon mature and old growth ecosystems and supporting regional biodiversity,
- Incorporating Indigenous Knowledge into planning, project design, and implementation to achieve forest management goals and meet the agency's general trust responsibilities, and
- Providing a predictable supply of timber and non-timber products, and other economic opportunities to support the long-term sustainability of communities located proximate to National Forest System lands and economically connected to forest resources.

### **Comments**

The scoping period (Published 12/18/23 and comments due 2/2/24) is too short of time to allow for review of supporting documents to provide specific meaningful comments.

The goal of the NWFP was to provide a “balanced and comprehensive strategy for the conservation and management of forest ecosystems, while maximizing economic and social benefits from forests.”

This proposed action fails to strengthen local economies and communities by focusing on only one aspect of forest conditions.

Consider shifting from single species management to maintaining and restoring habitat for multiple species to manage for ecosystem resilience under future uncertainty.

The synthesis recognized the need for ecosystem management (including early seral habitat) by stating: “ the broad goals of forest biodiversity conservation would not be scientifically viable if they focused only on one stage of a dynamic system--all developmental phases and ecological processes must be considered (Spies et al. 2009), including post-disturbance stages (fig. 3), non-forest vegetation and younger forests that constitute the dynamic mosaic of vegetation in landscapes of the NWPF area. These other stages and types have distinctive biodiversity and must be considered in any discussion of forest conservation”.

The Siskiyou Forest Plan, 1989, placed 46% of the Forest (505,000 acres) in planned timber harvest which would sustain early seral habitat and forage for deer and elk. The NWFP amendment to the Siskiyou Forest Plan placed 16% of the Forest (169,816 acres) in planned timber harvest (Matrix). However, Matrix contains unmapped Riparian Reserves (intermittent streams) which are estimated to make up 52% of the area. With unmapped Riparian Reserves removed from Matrix, 7% of the Forest (1,092,302 acres) is programmed for timber harvest (78,713 acres).

An estimated 30% of Matrix contains suitable nesting, roosting and foraging habitat for spotted owls which currently cannot be cut. **This leaves an estimated 5% of the Siskiyou National Forest for programmed timber harvest to provide sustainable early seral habitat for forage for deer and elk** (Siskiyou National Forest Management Indicator Species Forest-Wide Environmental Baseline and Species Account, 2011).

The management of fire and fire suppression then becomes critical for maintaining early seral habitat within the natural range of variability.

Promote active management in plant and animal habitats to restore and promote ecological resilience

Riparian habitat management should be a NWFP amendment focus area because it makes up 50% of the Siskiyou National Forest. Riparian habitat should be managed within the natural range of variability. Stop trying to grow mature/old-growth conifer forest on every acre of riparian habitat.

Unique habitats such as meadow, deciduous oak woodland and oak savanna's need their own management allocation. This will put the focus on what they need and contribution to diversity and not have to go through the mature/old-growth conifer screens.

Recreation should have greater focus. Increased recreation support was supposed to help offset some of the impacts from lost timber harvest to local community's.

The synthesis does not capture and record the recreation facilities (campgrounds, trailhead toilets, etc.) that have been closed in rural locations since the NWFP was implemented, even though the Siskiyou National Forest Plan, 1989, states: Recreation and tourism play a significant part in the economy, life-style, and use of southwestern Oregon. Local counties have chosen tourism as their 'Oregon Economic Comeback Strategy,' and look for support and participation by their neighboring National Forests in this strategy.

The synthesis failed to capture the significant loss of public access to private timber lands for recreation (including hunting) since the NWFP was implemented. Especially in the last 5 years. The impacts of road closures identified in Travel Management to recreation, harvesting non-timber forest products, fire suppression, and restoration treatments have not been disclosed.

Land allocations should be adjusted to a level assuring a higher likelihood of the desired future condition being achievable and risk to communities can be minimized.

There should be more emphasis on providing sustainable deer and elk populations for the food, recreation and economic value they provide the public and local communities.

“The NWFP was designed to include an adaptive management approach to “learning from doing.” This set high aspirations for the scientific rigor of the plan, however there has been little adaptive management work done since the plan was initiated.” Provide more freedom to conduct adaptive management in more locations with fewer restrictions.

The “Land Management Plan Direction for Old-growth Forest Conditions across the National Forest System” EIS is concurrently out for scoping. It is projected to be completed after the NWFP Amendment EIS is completed. The “Land Management Plan Direction for Old-growth Forest Conditions across the National Forest System” EIS has the Secretary of Agriculture as the deciding official, so the proposed action is not subject to the objection process. So, is the NWFP amendment making predecisional assumptions and decisions? Or will it be changed after the NWFP EIS is completed with no objections allowed?

We support managing the land and resources of the National Forest System to provide for **multiple-use** and sustained –yield of products and services.

We encourage more local public and county engagement.

Thank you for the opportunity to comment.

/s/ Thomas P. Hawkins

Thomas P. Hawkins  
CCPLA Chair

/s/ Michael A. Miller

Michael A. Miller  
CCPLA Environmental Coordinator