



## DOUGLAS COUNTY COMMISSIONER TIM FREEMAN

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1036 SE Douglas Ave., Room 217 ➤ Roseburg, Oregon 97470

February 1, 2024

Regional Forester  
U.S. Forest Service  
1220 SW 3rd Avenue,  
Portland, OR 97204  
CC: sm.fs.nwfp\_faca@usda.gov

Submitted via online portal (<https://cara.fs2c.usda.gov/Public//CommentInput?Project=64745>)

### **Re: Comments of Douglas County on Northwest Forest Plan Amendment**

On behalf of the Douglas County Board of Commissioners (“Douglas County”), please accept the following comments on the U.S. Forest Service’s Notice of Intent to amend the 1994 Northwest Forest Plan. The 1994 Northwest Forest Plan (“NWFP”) has been a travesty in forest management for rural communities, forest diversity, threatened and endangered species, ecosystem health and resilience, native species, and more. For the past 28 years the forests subject to the NWFP have experienced increased rates of severe wildfire, depleting biodiversity, and significant declines in wildlife populations, including in the species the NWFP was chiefly concerned with protecting. Meanwhile, rural timber-dependent communities have been burdened by the substantial decrease in sustainable timber that has been sourced from the NWFP area. In short, the NWFP has exacerbated forest health issues, harmed native species, contributed to declines in threatened species, and has harmed rural communities by heavily limiting the harvest of forest products.

Douglas County appreciates that the Forest Service has exhibited at least some awareness of these issues in its 2020 Biological Assessment of Northwest Forests. Douglas County is hopeful that the Forest Service will continue to acknowledge the many shortcomings of the Northwest Forest Plan as it moves forward with plan revisions. It is critical that the Forest Service be able to recognize and fix its past mistakes in the future, so that wildlife, diversity, and rural communities alike can all take benefit from healthier forests, air, water, and economies. Therefore, Douglas County urges the Forest Service to move forward with a wholesale revision to the Northwest Forest Plan, which emphasizes the use of forest management—including sustainable timber harvest—to improve forest resilience and diversity.

### **Background**

Douglas County is located in heavily-forested southwestern Oregon with approximately 110,000 residents. The County extends from the Pacific Ocean to 9,182-foot Mt. Thielsen in the Cascade Mountains. The economy of Douglas County is largely dominated by its vast timber resources. Douglas County contains nearly 2.8 million acres of commercial forest lands, including forests managed by the U.S. Forest Service (“Forest Service”), the Bureau of Land Management (“BLM”), private forest manufacturing and management firms, small landowners, and the County itself. Over 50% of the land area in the County is owned by the federal government and managed by the Forest Service or BLM, including



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lands owned and managed by the BLM under the Oregon and California Lands Act (O&C lands).

Douglas County has seen the decline of the timber industry in recent decades. Historically, the County received funds from the federal government tied to Forest Service and BLM timber sales. The federal government used a revenue-sharing formula from activities on federal land to partially compensate counties for the presence of untaxable, publicly owned land. However, timber harvest on federal lands has fallen dramatically, from 800 million board feet (mmbf) in 1989 to less than 90 mmbf in 2020, largely as a result of regulatory burdens, such as the listing of endangered and threatened species, designations of critical habitat, wild and scenic river designations, and the Northwest Forest Plan, which limits timber harvest opportunities. The negative, direct economic impacts to the County itself, and the negative socio-economic impacts across all the rural communities within the County, cannot be overstated. The human impacts have been drastic, far-reaching, and long-lasting.

Restrictions on forest management have also had a dramatic impact on wildfires. Limited harvest of green timber, as well as the limited salvage of burned timber, has led to an overstocking of the land base and a substantial increase in fuel loads and, consequently, large-scale wildfires. For instance, in the summer of 2013, the Douglas Complex Fire burned 48,679 acres to the north of the city of Glendale. That same summer, the Whiskey Fire burned 17,891 acres of forest in Douglas County in the Umpqua National Forest near the Loafer Timber Sale Project. In the summer of 2015, the Stouts Creek Fire burned 26,452 acres located to the south of the Loafer Timber Sale project. In the summer of 2017, the North Umpqua Complex Fires burned over 64,000 acres. In 2019, the Milepost 97 Fire burned 13,119 acres. During the extraordinary fire season of 2020, the Archie Creek Fire and Thielsen Fire collectively burned 141,517 acres. In 2021, fires in Douglas County burned *another* 140,000 acres, almost entirely on Federal land.

Smoke from these wildfires impacts public health. These serious health impacts are an environmental justice issue that many rural counties throughout Oregon face because of the federal government's failure, or inability, to responsibly manage forests, due, in large part, to unnecessary and/or unwarranted restrictions that all center around critical habitat and the Northwest Forest Plan. In short, forest-management straying further from harvest opportunities has been nothing short of a complete failure and unmitigated disaster for the economies and social fabric of rural Western Oregon communities, and Douglas County is the epicenter of this catastrophe.

Forest management is a complex issue which has a substantial impact on rural communities. In this context, forest management is certainly not limited to the harvest and sale of forest products. Rather, controlled burns, danger tree removal, timber harvests, fuel reduction projects, road restoration, and more play a crucial role in creating a healthy forest. Therefore, Douglas County is often a proponent of projects which enhance forest resilience and diversity, which often involves the use of commercial harvest to improve stand densities, open up habitat for wildlife, and improve wildfire resilience. Douglas County is of the overarching view that commercial timber harvest is a crucial tool which needs to be utilized to achieve the long-term forest health and sustainability which benefits all persons and species dependent on our national forests.



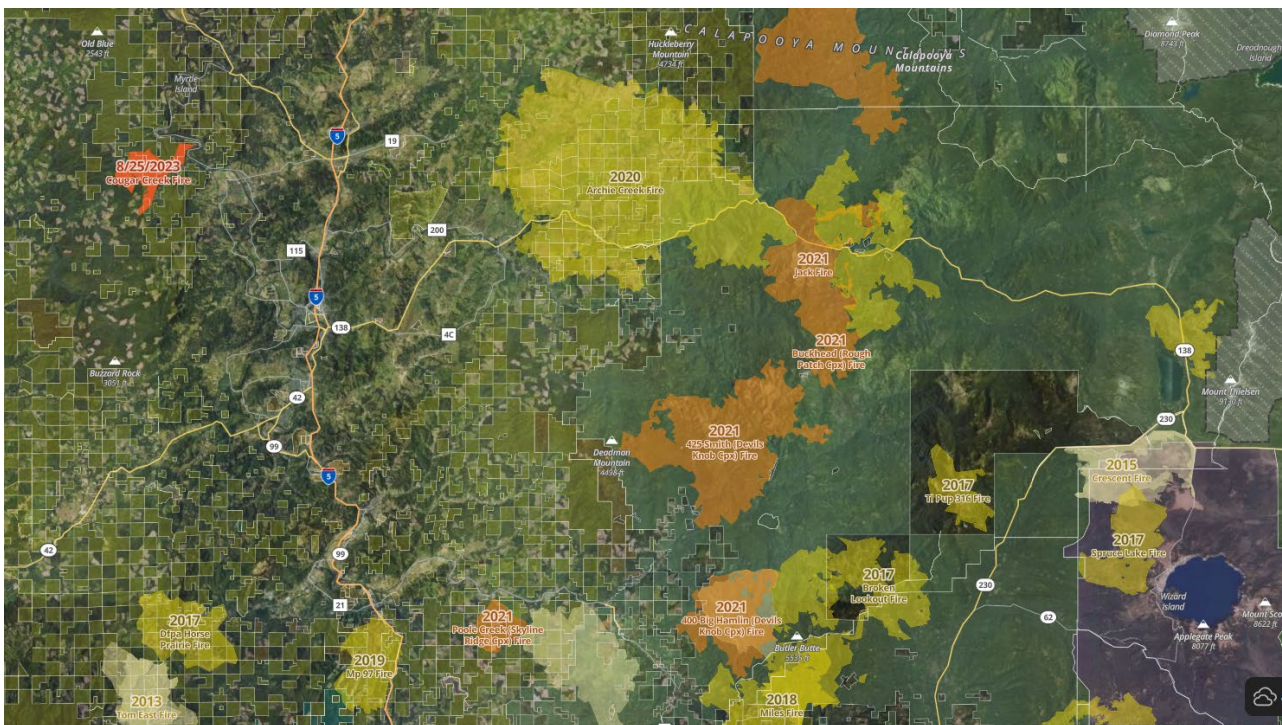
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## Comments

### **A. Improving Forest Resiliency Must be at the Forefront of Any Forest Plan Revision.**

The prevalence and scope of severe wildfire in the western Cascades, particularly in Douglas County, has been cataclysmic over the past 15 years. A snapshot of the fires which have devastated the Umpqua National Forest and O&C Lands in eastern Douglas County during this time period best tells the story:



Since the turn of the century, hundreds of thousands of acres, if not millions of acres, have burned on the western slope of the cascades in Douglas County.<sup>1</sup> The above image paints a dreary picture of the environmental catastrophes Douglas County has dealt with in recent years. Unfortunately, the reality is much worse. Residents of Roseburg and the Umpqua Valley, Douglas County’s most populous region, have become accustomed to seeing the summer sun clouded with smoke and the Valley’s rolling hills cloaked in a dense haze. Air quality for much of the summer sits at hazardous levels while the County’s economy and infrastructure suffers from years of declining revenues. Within the Umpqua National Forest firefighting has become as big of a business as actual forest management, and wood products processors scramble to buy up available logs to keep their mills running.

<sup>1</sup> The earliest fire depicted in the above map is from 2009. Many more acres burned between 2000 and 2009. Some of these other fire scars are easily seen on the map. Altogether, this paints a grim picture of the Umpqua National Forest. It will take many of these burned acres an *absolute minimum* of 50 years before trees within the burn start to reach maturity.



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When the Forest Service authored its 2020 Bioregional Assessment of Northwest Forests in July of 2020, it acknowledged the need to improve forest resiliency to wildfire across the NWFP planning area. Little did the Forest Service know that its assessment was simply a prediction of what was about to occur. It goes without saying that the 2020 fire season was one of the worst on record, as the Archie Creek and Thielsen fires burned over 140,000 acres, and were just a couple of the many similarly-sized fires that ravaged the western cascades. In Douglas County, the 2021 fire season was not much of an improvement, burning another 140,000 acres. All told, since the 2020 Bioregional Assessment was released well over ¼ million acres have burned in Douglas County, much of this within the Umpqua National Forest.

The 1994 Northwest Forest Plan is largely to blame for creating the forest conditions that exacerbated these wildfires. As the 2020 Assessment acknowledged, the NWFP created a one-size-fits-all management policy centered around protecting and increasing spotted owl habitat, without acknowledging how that management policy would create unhealthy forest stocking rates, a decrease in forest complexity and diversity, and an overarching worsening of wildfire risks and forest resilience. While initially the quantity of spotted owl habitat may have improved by around 3% during the first 25 years under the NWFP, this gain and more was lost in the recent catastrophic fire seasons. Thus, the NWFP's focus on protecting spotted owls backfired by exacerbating wildfire frequency and intensity, resulting in less habitat today than there was 30 years ago. *See Range-wide declines of northern spotted owl populations in the Pacific Northwest: A meta-analysis*, Elsevier (July 2021) <https://doi.org/10.1016/j.biocon.2021.109168>; *Northern Spotted Owl Still Fights for Survival*, U.S. Geological Survey (Oct. 6, 2021) <https://www.usgs.gov/news/featured-story/northern-spotted-owl-still-fights-survival>.

Substantial changes in management need to be made to address the wildfire trend in the planning area. While the fires which have ravaged the Cascades over the past decade cannot be reversed, the Forest Service can make efforts to ensure that future fires do not spread out of control, and that forest visitors and firefighters are safe.<sup>2</sup> The most effective and economical solution to this wildfire crisis is to increase the utilization of commercial harvest across the NWFP area, allowing overstocked stands of trees to be thinned, fuel breaks to be created, and grasslands to be restored. Even if actions like these could have short-term adverse effects on listed species, like the spotted owl, the Forest Service must acknowledge that wildfire risk mitigation through commercial harvest is a proactive management tool which directly addresses a leading spotted owl risk factor.

Studies have shown that mechanical thinning alone can alleviate wildfire risks, and when paired with other management strategies, such as post-thinning controlled burns, can dramatically improve wildfire resilience. *See Johnston, James et al., Mechanical thinning without prescribed fire moderates wildfire behavior in an Eastern Oregon, USA ponderosa pine forest*, *Forest Ecology and Management* (Dec. 1, 2021); *Graham, Russell et al., Effects of Thinning and Similar Stand Treatments on Fire Behavior*

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<sup>2</sup> These efforts may also improve wildlife habitat. Recent science has shown that acreage burned at high severity no longer provides suitable habitat for species such as the spotted owl. *See Jones et. al., Megafire causes persistent loss of an old-forest species*, *ZSL* (May 9, 2021) <https://doi.org/10.1111/acv.12697>. Preventing future severe fires through the creation of fuel breaks can benefit these species.



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in *Western Forests in Western Forests*, Utah State University (1999). Therefore, the Forest Service must analyze the benefits of commercial harvest and other management strategies on reducing fuel loads and addressing extreme wildfire behavior. Moreover, as part of this analysis the Forest Service also must consider how a *lack* of commercial harvest ultimately affects fuel loads, forest health, tree mortality, drought resistance, and more if paired with continued wildfire suppression.<sup>3</sup>

Ultimately, the revision of the NWFP must utilize more management strategies that are designed to create measurable improvements in wildfire resilience and forest health. To meaningfully create forests that have healthy stocking levels as well as insect, drought, and wildfire resilience, the NWFP revision must significantly increase the use of commercial harvest across the entire plan area.

### **B. Commercial Harvest is Critical for Ecosystem Diversity.**

The 2020 Bioregional Assessment acknowledges that a loss of ecosystem diversity has been a consequence of the one-size-fits-all management strategies piloted by the NWFP. Douglas County agrees. The NWFP's singular focus on creating forests which were purported to benefit spotted owls and other "old growth dependent" species had the opposite effect by increasing wildfire risks (discussed above) and eliminating the diverse ecosystems which are critical to healthy forests.

The loss of ecosystem diversity was foreseeable under the NWFP. The near-exclusion of commercial timber harvest from the plan area, and the complete exclusion of regeneration harvest methods, eliminated forest openings crucial to wildflowers, insects, birds, and megafauna, such as deer, elk, mountain lions, and wolves. *See, e.g.,* Rowland, Mary et al., *Modeling Elk Nutrition and Habitat Use in Western Oregon and Washington, Wildlife Monographs* (Oct. 23, 2018) (explaining that Roosevelt elk across the NWFP area are limited by nutrition availability, and that forage within Forest Service lands has decreased substantially due to a lack of timber harvest, causing declines in elk habitat quality); *Roosevelt elk population estimate and herd composition in Oregon, 2018 - 2023*, Oregon Department of Fish and Wildlife, [https://www.dfw.state.or.us/resources/hunting/big\\_game/controlled\\_hunts/docs/hunt\\_statistics/23/Roosevelt%20Elk%20Population%20Estimates%20and%20Herd%20Composition%202018%20-%202023.pdf](https://www.dfw.state.or.us/resources/hunting/big_game/controlled_hunts/docs/hunt_statistics/23/Roosevelt%20Elk%20Population%20Estimates%20and%20Herd%20Composition%202018%20-%202023.pdf) (recording downward trends in Roosevelt elk populations, especially in hunting units containing substantial amounts of land managed under the NWFP. For instance, in the Santiam, McKenzie, Indigo, and Dixon units of Oregon's western cascades, elk populations are in continuous decline and far under management objectives). This lack of diversity contributes to a loss of overall ecosystem function, wherein even the old growth dependent species are harmed when management strategies focused on "creating" old growth result in the depletion of other plant and animal species.

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<sup>3</sup> Any plan revision must acknowledge that in today's society, natural wildfire regimes—especially in the western Cascades—are unacceptable. That is, society cannot truly coexist with natural wildfire regimes by letting fires run their course. The human risks of letting a fire burn are far too great, especially when the Forest Service has the tools to fight fires. Thus, the plan revision must acknowledge that wildfire suppression will always be a present factor. This, in turn, will result in unhealthy forests unless the Forest Service proactively manages its forests—through timber harvests, controlled burns, etc.—to alleviate concerns created by ongoing fire suppression.



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Once again, the Forest Service must acknowledge the failures of the NWFP, and adopt management strategies aimed at reversing the NWFP's shortcomings. With regards to ecosystem diversity, the NWFP failed by utilizing a one-size-fits-all strategy that was singularly focused on protecting and "creating" "old-growth" ecosystems. This allowed natural meadows to become enclosed, caused a significant reduction in forest openings, and ultimately contributed to declining populations of once-abundant plant and animal species.

The most sustainable and economical solution to this self-made issue is to reverse the policy decisions that led to the loss of ecosystem diversity. That is, rather than exclude commercial timber harvest from much of the NWFP area, embrace the benefits that well-planned harvest units bring. Through thinning, variable density harvest, and even regeneration harvest the Forest Service can bring back natural meadows, improve wildlife forage, reinvigorate plant and animal communities, and create a diverse, sustainable forest for all species. Timber harvest can create habitat for rodents, increase wildflowers and pollinators, improve depleted megafauna habitat, and more. Timber harvest is the key to improving ecosystem diversity, and the Forest Service has the ability to utilize timber harvest in combination with scientific studies about the need for diverse habitats to generate a forest plan that benefits a wide array of interests. Ultimately, this will require increasing timber harvest and eliminating timber harvest restrictions across the NWFP area, so that the Forest Service has the flexibility to utilize commercial harvest management strategies in a manner which will create a more diverse landscape and ecosystem. The Forest Service must study how it can increase its use of timber harvest to address needed ecosystem diversity, and the variety of benefits that would be realized by creating a more diverse landscape that supports a wide variety of native species.

### **C. Forest Products are Underutilized to the Great Detriment of Rural Communities and Ecosystem Resilience.**

The 2020 Bioregional Assessment recognizes that forest products—specifically timber harvest—have been underutilized under the NWFP. As discussed in the 2020 Assessment and above, this has had an array of negative impacts, from fire to a loss of biodiversity. Moreover, the underutilization of forest products has devastated local timber-dependent communities, and is contributing to the national shortage of affordable housing by placing supply pressures on the United States' lumber market. *See Steve Courtney, Are You Planning For The Reduction In Northwest Timber Supply?*, ResourceWise (March 10, 2022) <https://www.forest2market.com/blog/are-you-planning-for-the-reduction-in-northwest-timber-supply>.

The NWFP called for the harvest of 1.1 billion board feet per year across the planning area. Over the NWFP's lifetime, timber harvest has never come close to that amount. No party—plant or animal—has benefited from the loss of timber harvest, as it has caused great harm to rural communities, exacerbated wildfire risks, and depleted biodiversity. Douglas County has been ground zero to these impacts. The County has experienced the harm that follows from the near-elimination of timber utilization on Forest Service lands, watching timber related income dwindle in resource-dependent communities.



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Now it is necessary that the Forest Service make up lost time. The systematic underutilization of timber harvest in areas specifically reserved for harvest under the NWFP has exacerbated the wildfire and biodiversity challenges discussed above, and harmed rural communities. The Forest Service has over a ten-billion board feet backlog of timber that should have been harvested under the NWFP, but wasn't. Now, the Forest Service needs to plan to make up that backlog over time in its NWFP revision, while also increasing the utilization of timber harvest in other areas. The Forest Service must analyze the benefits that would come from harvesting the backlog of timber within the planning area. This includes the benefits that would become rural communities, ecosystem diversity, and wildfire resilience.

Moreover, the Forest Service must ensure that timber products will not be underutilized once again in the wake of any plan revision. The NWFP has done enough damage to communities and the environment, and the Forest Service must now address and alleviate that harm. Allowing forest products to continue to be underutilized across the planning area would be a policy failure. The Forest Service must explore all options to ensure that the backlog of merchantable timber on Forest Service land is properly utilized to revitalize rural communities and ecosystem diversity.

### **D. Economic Harm Must Be Adequately Evaluated.**

There can be little question that the NWFP resulted in significant, lasting economic harm to rural communities. Communities which once thrived from the utilization of federal timber, and the payments in lieu of taxes that were paid back into the community, have now been suffering from a 30-year depression of federal timber harvest. For the Forest Service to accurately analyze the impacts of any plan revision, it must first study the lasting economic impacts of the NWFP. This includes the jobs lost, the mills closed, the county payments eliminated, and all of the downstream affects of each of those reductions in revenue. Ultimately, the Forest Service must acknowledge how much the NWFP has depressed rural communities and their wellbeing.

Only once the actual economic impact of the NWFP is realized can the Forest Service appropriately evaluate the effect of any plan revision. An analysis of the NWFP's economic impact provides the baseline for future economic impact study. And, in this process, the Forest Service must strive to alleviate the harms that it caused to rural communities. Increasing the use of timber harvest management strategies across the national forests is the first step to alleviating these harms. Opening the forest back up to commercial usage will bring well-paying jobs back into rural communities. Moreover, if federally-generated timber receipts reach a high enough level, timber dependent counties will be revitalized by payments in lieu of taxes that will fund school improvements and other much needed social programs.

There are many downstream benefits which would be realized from increasing timber harvest on federal lands. Inflationary pressures on lumber markets would be reduced, which would have subsequent benefits on affordable housing. Federal expenses under the Secure Rural Schools Act could be reduced if federal timber receipts were sufficient. And, the harvest of timber is self-sustaining, paying for itself and for future sustainable yield management.



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Ultimately, the Forest Service must sufficiently analyze the economic impacts of any NWFP revision. Without such an analysis, any plan revision would be built on a nonexistent foundation.

### **E. A Variety of Other Issues Need Analyzing.**

There are many other issues and topics which need analysis in a revision to the NWFP. For instance, the increased use of regeneration harvest must be evaluated. Regeneration harvest has a multitude of benefits, such as replicating natural meadows or fire scares, or increasing solar radiation in select locations within national forests, which allows different plant communities to thrive. This can specifically benefit wildflowers, grasses, pollinators, and large ungulates like deer and elk which require the forage typically found in forest openings. Moreover, regeneration harvest allows a higher utilization of select areas of a forest, which can allow the Forest Service to harvest more timber with smaller areas of disturbance. The revision of the NWFP must specifically analyze the use of regeneration harvest as a forest management strategy, and ensure that regeneration harvest is a specifically authorized strategy to meet planning goals.

The NWFP revision also must specifically address the issues caused by fir encroachment in meadows, and how those issues could be resolved through commercial harvest. Similarly, the NWFP revision must specifically analyze how elk and deer habitat and populations have changed under the NWFP, recognize the issues caused by reduced forest openings, and create a plan for the improvement of elk and deer summer and winter habitats through commercial timber harvest.

The NWFP also needs to evaluate the effects of salvage harvest of burned or dead trees. The increase in fire activity and recent tree mortality trends are requiring the Forest Service to increase use of salvage harvest. Salvage harvest is necessary to improve forest safety, wildfire resilience, and to generate income from otherwise-devastated ecosystems. While fire has a beneficial role in ecosystems, the Forest Service must analyze the benefits of salvage harvest. The NWFP revision should allow the Forest Service to utilize quick, aggressive salvage harvest strategies whenever forests are affected by wildfire or increased rates of tree mortality. While the retention of snags is important, thousands-upon-thousands of acres of dead snags provide no benefit, and only exacerbate the risk of severe wildfire.

### **Conclusion**

Douglas County's comments at this stage hardly encompass all the issues that will arise within the revision to the NWFP. Douglas County plans to keep close watch on the plan revision process, and asks that it be included in the development of the NWFP revision. That said, Douglas County urges the Forest Service to acknowledge the many failures of the NWFP, and use the plan revision process as an opportunity to fix the Forest Service's previous mistakes. Most of all, Douglas County urges the Forest Service to increase the use of commercial timber harvest as a tool to address the wildfire, ecosystem diversity, and utilization issues that all flowed out of the NWFP.





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Douglas County appreciates the opportunity to submit these comments for the agency's consideration.

Sincerely,

A handwritten signature in black ink, appearing to read "Tim Freeman".

Tim Freeman  
Douglas County Commissioner

A handwritten signature in black ink, appearing to read "D M Carollo".

Dominic M. Carollo  
Carollo Law Group  
Special Counsel to Douglas County