



**DEPARTMENT OF
NATURAL RESOURCES**

Forest Resilience Division

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February 1, 2024

Jacque Buchanan
Regional Forester
U.S. Forest Service
1220 SW 3rd Avenue
Portland, OR 97204

RE: Proposed 1994 Northwest Forest Plan Amendment

Dear Regional Forester Buchanan,

On behalf of the Washington State Department of Natural Resources (WA DNR), I am writing in response to your notice of intent to prepare an environmental impact statement for an amendment to the 1994 Northwest Forest Plan (NWFP).

National Forests are an integral component of our forests in Washington State, comprising 48% of the 22 million acres of forestland in the state, our National Forests provide critical cultural, ecological, economic, and social values. The management of National Forest System Lands is integral to achieving Washington's forest health and resilience goals as outlined in our [Washington State Forest Action Plan](#), [20-Year Forest Health Strategic Plan: Eastern Washington](#), [10-Year Washington Wildland Fire Protection Strategy](#), Shared Stewardship MOU, and relevant state legislation. The outcome of the NWFP amendment process will have significant implications for the people of Washington State and the forests we rely on for economic, social, spiritual, and ecosystem services.

The development of the NWFP was a watershed moment in our natural resource management history. Across more than 24 million acres of forestland, ecological values were put on par with economic and social values. The plan successfully stemmed the loss of old growth forests to logging, but new challenges have emerged that threaten old growth forest ecosystems, the northern spotted owl, and the people and communities that depend on our forests. WA DNR commends the Forest Service for establishing the Northwest Forest Plan Federal Advisory Committee and taking steps to amend the plan.

This NWFP amendment process is focusing on the following five interrelated topic areas as the basis for a preliminary need to change:

- *Improving fire resistance and resilience across the NWFP planning area,*
- *Strengthening the capacity of the 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.*

WA DNR supports the five topic areas identified in the need for change. As the NOI notes, these five topic areas are interrelated as are most natural resource issues. Addressing all five topic areas can be achieved within the framework of the 1994 NWFP. An amendment to the NWFP can certainly clarify and strengthen the ability to address these issues in the NWFP area.

We ask that the following thoughts and comments be considered as you develop an environmental impact statement for the NWFP amendment:

State agencies should be officially recognized as cooperating agencies in the NWFP amendment process.

WA DNR is led by a statewide elected Commissioner of Public Lands who is designated by state law as “...*the state of Washington's lead for all forest health issues*” (RCW 76.06.150). In their role as the forest health lead for Washington State, the Commissioner of Public Lands is directed by state statute “...*to promote communications between the state, tribes, and the federal government regarding forestland management decisions that potentially affect the health of forests in Washington and will allow the state to have an influence on the management of federally owned land in Washington.*” In this role, the Commissioner of Public Lands shall also assume the lead state role for developing formal comments on federal forest management plans that may have an impact on the health of forests in Washington State. Please consider this letter as formal comments from the Washington State Department of Natural Resources regarding the NWFP amendment. In an era of Shared Stewardship, we are requesting the WA DNR be officially recognized as participating in the NWFP amendment process as a cooperating agency.

Habitat Conservation Plans for Washington State DNR-Managed Trust Lands

The WA DNR manages over 2 million acres of state forested trust lands for trust beneficiaries. 1.6 million acres of DNR trust lands are covered by a Habitat Conservation Plan within the range of the northern spotted owl (includes all trust lands within western Washington, and the eastern slopes of the Cascade Mountains). The habitat protections, including for the northern spotted owl, on national forestlands are directly related to the Habitat Conservation Plan's conservation strategies established for DNR-managed lands. We are interested in any proposed shifts in the identification of late successional reserves and/or other spotted owl conservation areas, and changes to spotted owl habitat thresholds contemplated during the NWFP amendment process.

Clearly recognize that frequent-fire forests require different strategies and guidelines than westside forests and make those strategies and guidelines clear in the NWFP amendment.

As described in the Federal Register Notice, drought-driven insect and disease outbreaks and high severity wildfire are now the leading causes contributing to loss of old growth forests in the NWFP area. This aligns with the research results produced by forest health scientists at WA DNR. Further, WA DNR scientists estimate that 30-50% of forests in the eastern Cascades of Washington require some type of active management to restore forest health and resilience. In many parts of eastern Washington, current interpretations of NWFP land allocations on federal lands make it difficult, if not impossible, to meet the state's legislative mandates and associated management objectives focused on landscape restoration and fire resilience.

The Okanogan-Wenatchee National Forest (OWNF) and the Mt. Adams District of the Gifford Pinchot National Forest (GPNF) in Washington are frequent-fire forests. The OWNF and Gifford Pinchot National Forest are covered by the NWFP. A NWFP amendment should consider revising the land allocations to manage at a landscape-level for resilience and natural range of variability in frequent-fire forests.

The two most common current land allocations are matrix and late-successional reserve. In reality, very little land is being managed with primarily an economic focus on the OWNF and Mount Adams District of the GPNF as was originally intended in the 1994 NWFP matrix land allocation. In fact, the 2012 Okanogan-Wenatchee Forest Restoration Strategy states that "Matrix, General Forest – Historically, the emphasis for general forest and matrix was on timber production, maximized for the former and programmed for the latter. However, traditionally implemented production forestry is generally inconsistent with fire, endangered species, and restoration objectives. Consequently, these areas are now considered with the rest of the landscape and any treatments that are proposed are guided by restoration principles." The OWNF and GPNF are primarily being managed for forest restoration, resilience, and risk reduction objectives with economic values emerging as by-products. The US Forest Service should consider a new land allocation for the OWNF and Mt. Adams District of the GPNF that is consistent with the Okanogan-Wenatchee National Forest's forest-level restoration policy that has been in place since 2010. This clarity in land allocations can reduce conflicting policies and clarify the management emphasis with clear, consistent guidelines, and priorities guiding its management.

The 2012 northern spotted owl critical habitat designation designated most forested areas on the OWNF and GPNF as NSO critical habitat including much of the matrix in addition to the late successional reserves. Creating a new land allocation in these frequent-fire landscapes will allow the national forest to resolve currently overlapping management priorities and considerations in current condition, rather than a static boundaries and management emphasis intent that was appropriate in 1994. The focus of this new land allocation would be restoring and fostering resilience in terrestrial and aquatic conditions at a landscape scale. Commercial and non-commercial forest products would be a by-product of the required restoration actions. The

amounts and types of different forest structures in the “forest landscape restoration” allocation should be based on natural range of variability, not lines on a map and arbitrary habitat thresholds.

If the late-successional reserve system is retained for the OWNF and GPNF in the NWFP amendment, then setting forest structure and habitat targets based on the natural range of variability should be seriously considered for each late successional reserve. The Okanogan-Wenatchee National Forest Restoration Strategy (2012), provides an excellent framework for integrating natural range of variability with tools to assess forest restoration needs.

Similarly, Riparian Reserves in dry, frequent-fire forests should be managed to better reflect the disturbance ecology of the ecosystem. The environmental analysis that explores alternatives for NWFP should analyze options for outer riparian buffers in dry forests in contributing to risk reduction and landscape restoration goals. The name Riparian Reserve connotes a passive management approach whereas active management with an emphasis on contributing to riparian health is necessary both to improve aquatic conditions in these areas as well as consider them within the context of landscape treatments.

Analyze for post-fire restoration needs and actions within the NWFP area.

Wildfire is the largest disturbance agent influencing the condition of federal forests within the NWFP area. As the notice of intent (NOI) describes in the need for change, wildfire is anticipated to increase across the NWFP area. Given this reality, WA DNR encourages the Forest Service to include post-fire management guidelines for all land use allocations in the NWFP as part of the alternative development process. Alternatives that clarify the types of post-fire management and recovery actions, including vegetation management, that are appropriate in the amended NWFP should be clarified as part of the EIS and associated decision.

Address how the mature and old growth Executive Order (14072) and associated process is integrated into the NWFP amendment.

The Biden administration’s Executive Order (EO) 14072 “Strengthening the Nation’s Forests, Communities, and Local Economies” is a distinct, but related effort at a national scale to inventory old growth and mature forests and assess threats facing these forests. The scope of this NWFP environmental analysis should clearly identify and integrate changes anticipated to the NWFP area as part of implementing this EO. The existing NWFP and forest-level policies such as the Okanogan-Wenatchee National Forest Restoration Strategy have guidance, standards, and guidelines regarding mature and old forest. The analysis should clearly describe how the mature and old growth amendment complements, overlaps, or is different from existing NWFP Standards and Guidelines. We refer the agency to our letter submitted in response to the Request for Information on this EO, where we provided reference to how our state has defined old growth and called out the importance to maintain options for forest management actions that accelerate the growth of old growth forest characteristics and/or reduce risk to old trees to be encouraged even in older stands.

Executive Order (14072) resulted in an inventory of existing old growth and mature forests. This updated mapping of existing habitat and old growth forests should be used to inform changes to land allocations in wetter, west-side forest ecosystems. Technology and data available to the Forest Service to identify the amount and location of older forests today is far superior to the information available at the time of the original NWFP. These new data and mapping tools should be used to inform analysis and revision of land allocations and boundaries to better align the existing condition of forests to our desired long-term management goals and better reflect existing conditions on the ground and help land managers more effectively meet the multiple objectives of the NWFP.

Due to the parallel timelines of the NWFP amendment and EO 14072 implementation, there is an opportunity for integration to streamline and limit overlapping policy direction to make project planning and implementation more efficient in the future and reduce potential confusion among land managers and the public. Clarity on these policies is urgently needed as we work together to address the forest health and wildfire crisis in the Western US in a timely fashion.

Integrate climate change threats, assessments, and adaptation strategies into the NWFP amendment to address the anticipated impacts of drought, altered hydrologic regimes, and shifts in species distribution.

Since the 2008 *Forest Service Strategic Framework for Responding to Climate Change*, a series of documents have provided the Forest Service direction to integrate climate change adaptation into agency-wide policies including *The National Roadmap for Responding to Climate Change* (2011), *The U.S. Forest Service 2012 Planning Rule* (219.6 Assessment, pg. 21263), *Executive Order 14008 – Tackling the Climate Crisis at Home and Abroad* (2021), *USDA Action Plan for Climate Adaptation and Resilience* (2021), *Forest Service Climate Adaptation Plan* (2022), and *USDA Secretary’s Memorandum 1077-004 – Climate Resilience and Carbon Stewardship of America’s National Forests and Grasslands* (2022). The NWFP amendment process offers a meaningful opportunity to provide a landscape-scale framework and direction for national forests to integrate climate change into land management that can be complemented by individual forest plan revisions in the future.

Each National Forest in the Pacific Northwest Region has a recently completed Climate Vulnerability Assessment. The assessments provide not only an overview of the climate vulnerabilities for each national forest, but recommendations to promote the adaptation of ecological systems to ensure they continue to provide ecosystem services for future generations. As risks associated with climate change, including increased wildfire, severe weather, and drought, impact the NWFP area, land managers need flexibility. WA DNR encourages this EIS to integrate the results of the Forest Service Climate Vulnerability Assessments in the development of alternatives.

Staff from Region 6 as well as individual national forests have joined our agency in participating in landscape conservation collaborations to foster resilience to climate change, including the

Cascadia Partner Forum and Cascades to Coast Landscape Collaborative. The NW Forest Plan amendment process allows the opportunity to utilize data driven tools and information from these efforts both inform planning and monitoring of the national forest system within the context of broader climate adaptation and resilience efforts.

In many ways, the NWFP has also served as a climate mitigation strategy for the region, dramatically increasing the amount of stored carbon in live trees on federal forests over the last thirty years. Existing NWFP direction on the protection and restoration of soils also contributes to carbon storage. The NWFP amendment should include an analysis of the impacts of carbon stores. WA DNR supports the development of alternatives that promote sustainable, long-term carbon storage through ecosystem management in line with the capacity of the system and the disturbance ecology of the respective forest type. The sustainability of carbon storage strategies and complement of carbon storage to landscape resilience goals is different in frequent-fire forests than in forests with less frequent fire return intervals. Therefore, the NWFP amendment should identify how carbon storage goals will integrate with land management direction on national forests as well as how strategies will differentiate in different fire regimes.

Another important climate adaptation strategy that should be addressed in the update is the restoration and reorganization of Region 6 seed production capacity. In its many seed orchards, Region 6 has production blocks representing over 300 tree populations, which can serve as important sources of seed to help restore forests after catastrophic wildfire, both on federal and non-federal lands. Unfortunately, most of these orchards have received little attention over the last 25 years, and due to ingrowth and lack of planned thinning, are themselves vulnerable to loss from fire. WA DNR has received funding from the Washington State Legislature to help address the large backlog of work in the Region 6 orchards in Washington, and collaborative work toward this goal is being done on some Forests. However, progress has been hampered in some places by District process. The future will require that orchards produce seed for areas well beyond the local District or Forest. Responsibility for decision-making about these orchards should be centralized with the Region Genetics program to facilitate more consistent and efficient restoration and management going forward.

The National Forest Road network provides critical access for recreation, natural resource management and fire suppression. This large road network has experienced decades of disinvestment and needs extensive maintenance and repair to continue to provide safe and reliable access and to adapt to future climate. The road network has a direct impact on aquatic resources and a well-maintained road system is critical to maintaining healthy streams. A well-maintained road system is also a very important climate adaptation strategy, especially on the western Washington National Forests that experience intense rainfall each year, which will be exacerbated by climate change. Currently the main way major capital improvements are made to National Forest system roads in western Washington is in the instance of catastrophic failure. When a road segment fails, emergency funds are often used to install new culverts, fix ditches, and crown the roads. Waiting for these road systems to fail is an irresponsible way to manage

such an essential, long-term asset. As part of the climate change adaptation strategies of the NWFP amendment process, consider assessing the status of National Forest System roads, what types of maintenance activities are needed where, and develop a NWFP road network maintenance strategic plan.

Maintain and revise the aquatic conservation strategy to strongly prioritize the importance of watershed and aquatic system function on our national forests.

Water is one of the most important resources our forests provide. National forests throughout the NWFP are the headwaters to our watersheds that provide critical water supply to communities downstream, and both the quality and quantity of the water supplied is directly related to the management and health of national forest lands. During the NWFP amendment process, it is worth exploring ways the NWFP could strengthen watershed resilience and aquatic restoration actions. Implementing landscape-scale, integrated terrestrial and aquatic restoration projects is critical to holistically managing forests and recovering threatened and endangered salmon and steelhead runs across the NWFP area.

Strengthen commitment to rural communities and enhance economic and social outcomes of the NWFP.

In addition to ecological goals, the NWFP established economic and social goals that this amendment process should assess progress towards and recommit to delivering upon. Northwest communities economic and social health are intricately tied to our national forests especially national forest adjacent rural communities and Tribes. We believe the long-term health of our forests is equally tied to the health of these communities, and our 2019 Shared Stewardship Memorandum of Understanding committed both of our agencies to “help support diverse and vibrant local economies through relationships, practices, collaboration, and investment. As stewards of the state’s natural resources, the parties will directly and indirectly support jobs and generate economic activity across the state”. The NWFP amendment environmental analysis should recommit to this principle, address short-comings and challenges in meeting any NWFP economic and social objectives, and present a meaningful path forward to support northwest communities.

The NWFP amendment analysis should present a regional and national forest specific suite of economic objectives, including forest products to be generated from our national forests. A predictable and meaningful supply of timber and forest products is important to sustain a viable wood products infrastructure in the region. The NW Forest Plan amendment should assess the existing land allocations, and present allocations for the future that clearly identify where sustainable forest management for producing local wood products will occur as a primary management emphasis and where it will occur as a by-product to restoration to meet other primary objectives (i.e. restoration, fire resilience). It should also update and provide projections regionally and by national forest for sustained and meaningful timber supply.

The NWFP amendment should strive to ensure the balance between ecological, economic and social values as intended in the original NWFP is met over time – learning lessons from the implementation to date.

Recognizing the ability to advance ecological and economic objectives will be critical to development of a NWFP amendment, and this amendment process provides an opportunity to update the objectives and role of our national forests in contributing to a healthy and vibrant natural resource economy. WA DNR anticipates that the Forest Service can generate significant economic activity and benefit to our region for decades to come, including providing a sustained timber supply. WA DNR supports the development of alternatives that seek to advance management direction that can meet both ecological and economic objectives.

Strengthen the adaptive management and monitoring components of the NWFP

We commend the NWFP's original commitment to both monitoring and adaptive management. We are committed to monitoring and have a strong history of collaborative forest monitoring with the Forest Service. Washington's Forest Action Plan commits to track implementation and be accountable for the commitments including to establish and describe the framework that will be used to identify monitoring metrics at various scales and provide public facing monitoring reports that will increase access to information on key indicators of success. The NWFP amendment presents an opportunity to recommit to monitoring and adaptive management in an era of shared stewardship and climate change.

Adaptive Management Areas were identified to develop and test innovative management to integrate and achieve ecological, economic, and other social and community objectives. In light of climate change and the desire to meet multiple land use objectives in dynamically changing landscapes, we believe areas dedicated to this purpose are still of importance. The NWFP amendment environmental analysis should review the work conducted and lessons from the AMA's since their establishment, including challenges faced and opportunities identified for future work. The alternatives should present guidance to ensure that land managers can effectively utilize these land allocations to advance our scientific understanding of forest ecosystems. WA DNR supports the development of alternatives that clarify the intent and associated standards and guidelines for management of AMAs.

Ensure the public and key decision-makers understand the effects of no-action.

The scope of the analysis should include an analysis of the cumulative effects of a "no-action" alternative in line with the need for change identified in the federal register notice. There are challenges experienced by national forests in meeting management and policy objectives under overlapping land management plans and policies that do not reflect current science and conditions. No-action in this case will prevent our national forest's from more effectively and efficiently increasing the health and economic vitality of communities surrounding National Forests. Providing the public and decision-makers with accurate information regarding the

effects of no action is critical to ensuring the Responsible Official has adequate information to make an informed decision.

Meaningfully include tribes, states, counties, and other relevant partners in NWFP regional review, interpretation and implementation processes.

Currently, NWFP interpretation and implementation review processes and forums are dominated almost entirely by federal agencies. Tribes, states, and rural communities are disproportionately impacted by the NWFP amendment process, regardless of the outcome. These partners deserve seats at the table during NWFP interpretation and implementation. The 1994 NWFP provided states and tribes the ability to participate in the Regional Interagency Executive Committee (RIEC), however, states and tribes have not participated for many years. The Forest Service should include States and Tribes in the RIEC.

Utilize and sustain the flexibility inherent in the 1994 NWFP to achieve forest health and resilience objectives along with old forest conservation objectives.

The US Forest Service should embrace and sustain the flexibility and adaptive management inherent in the 1994 NWFP to better achieve its management and restoration objectives. The plan was designed to be flexible and adaptable. Through this amendment process, the US Forest Service needs to review existing NWFP plan policy, procedures, and interpretations to develop consistent and up to date direction that reflect current science and the state of our forests today.

The NWFP was never intended to remain static, there is flexibility inherent within the 1994 NWFP to adapt to changing science and priorities regarding old forest and old forest dependent species. A lot of the challenges our forests face today, wildfire and drought, can be addressed within the framework of the 1994 NWFP.

As recognized by the national Wildfire Crisis Strategy, we cannot afford to not take meaningful action to increase the resilience of our National Forests to the wildfire and climate risks they face. The 1994 NWFP provides guidelines and tools that can be used to address the wildfire and climate crisis through forest restoration and fuel reduction actions. While the NWFP amendment process is underway, there are important landscape scale projects underway that need to continue moving forward. Therefore, there is an ongoing need for clear guidance and interpretation from the US Forest Service on the 1994 NWFP Standards and Guidelines as work continues to achieve the multiple objectives of reducing wildfire and climate risk and promoting old forests and old forest dependent species.

NWFP interpretation and implementation should be an evolving and adaptable process that uses the flexibility inherent within the framework. WA DNR suggests that the US Forest Service update its internal NWFP guidance documents and policies to reflect current science and priorities within the framework of the 1994 NWFP and clearly communicate these updates with their National Forests while it is concurrently formally amending the 1994 NWFP.

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Facilitate successful NWFP implementation throughout the NWFP area.

Following the selection of a preferred alternative, provide clear implementation instructions and guidance followed by technical assistance from the Regional Office for each national forest under the NWFP. National Forest staff must conform with a wide variety of plans, regulations and policies in their day-to-day work. Many of these plans and regulations are highly complex and open to interpretation. As part of the final NWFP amendment, clear guidance and ongoing direct staff support from the Regional Office is needed to translate the NWFP to individual National Forest staff working on project implementation and future forest plan revisions.

Thank you for your careful consideration of our comments. WA DNR appreciates our partnership with the USDA Forest Service. We look forward to working closely with your team throughout this plan amendment process.

Sincerely,

A handwritten signature in black ink, appearing to read "George Geissler", with a long horizontal flourish extending to the right.

George Geissler
Washington State Forester
Deputy Supervisor for Wildland Fire Management