

MANUFACTURING

C & D Lumber

Douglas County Forest Products

Goshen Forest Products

Herbert Lumber

Keller Lumber

Nordic Veneer

Northwest Hardwoods

Oregon Overseas Timber Co.

Roseburg Forest Products

Rosboro

Southport Forest Products

Starfire Lumber Co.

Swanson Group

Western Cascade Industries

Weyerhaeuser

LOGGING & TRUCKING

Al Pierce Co., LLC

Allen & Gibbons Logging

Boulder Creek Timber Co.

Don Whitaker Logging

E.H. Logging

Flury Supply Co.

Gene Whitaker Trucking

Harvey Log

Huffman & Wright Logging

Ireland Trucking

L&L Logging

Mountain Western Log Scaling

Smith Logging

Terrain Tamers

Western Equipment & Supply

FOREST LANDOWNERS

Circle Heart Forests

Coquille Indian Tribe

Cow Creek Band of

Umpqua Tribe

Conf. Tribes of Coos,

Lower Umpqua

& Siuslaw Indians

FIA Timber Growth Master, LLC

Lone Rock Timber Company

Mahaffy Tree Farm, Inc

Whitewater Forests LLC

February 1, 2024

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

**RE: Notice of intent to prepare an environmental impact statement (EIS):
Region 5 and Region 6; California, Oregon, and Washington; Forest Plan
Amendment for Planning and Management of Northwest Forests Within the
Range of the Northern Spotted Owl, 88 Fed. Reg. 24 (December 18, 2023).**

To Whom It May Concern:

Douglas Timber Operators (DTO) is a community-supported forest products organization based in Roseburg, Oregon. DTO's mission is to actively promote timber harvest, reforestation and production of forest products on public and private timberlands. Our membership includes over 150 forest product manufacturers, loggers, truckers, forest landowners, three Indian Tribes, local businesses and individuals. Our members and community have suffered extreme negative economic, social and environmental consequences of the Northwest Forest Plan ("NWFP").

INTRODUCTION

The NWFP has had profound and often devastating, unintended, and unanticipated consequences for our forests, the ecological values our forests provide to society, the forest sector, the forest workforce that stewards them, timber-dependent county governments and surrounding communities, businesses, and local economies.

For a NWFP amendment to be successful and durable moving forward, it must address two fundamental questions:

- 1) will an amendment maintain a passive management paradigm focused primarily on species management; or implement a proactive, flexible, science-based, adaptive management paradigm that focuses on overall forest health and resiliency; and
- 2) will the amendment provide clarity, predictability, and accountability in management across land use allocations to rebuild trust and credibility

with the public, Tribes, impacted communities, and the businesses and workforces tied directly to the implementation of the NWFP?

DTOs welcome the opportunity to modernize and improve the NWFP to address the forest health and wildfire crises on federal lands, to improve forest health and resiliency in the face of climate stressors, to support community well-being, and to boost socio-economic sustainability in the Pacific Northwest. To accomplish these commonly shared goals, the NWFP must be rigorously evaluated and modernized. It is within this context that we provide the following comments and recommendations.

THE PROCESS

Before we address the substance of the amendment and the opportunities for its improvement, we feel compelled to note our procedural concerns. Although we agree that the land management plans (LMPs) amended by the NWFP need to be updated, we disagree with the approach of using another amendment process rather than the revision process. The National Forest Management Act (NFMA) directs that forest plans “be revised from time to time when the secretary finds conditions in a unit have significantly changed, but at least every fifteen years.” 16 U.S.C. § 1604(f)(5).

It’s been 30 years. We’ve learned a lot since then. Conditions in our forests, surrounding lands, and impacted communities have changed significantly. After three decades of experience, data collection, and monitoring, the decision to pursue needed updates to address threats from wildfire resilience to climate change through a “focused” and targeted amendment rather than a revision is a missed opportunity for the forests and the public. We urge the Forest Service to reconsider this decision given the age of current LMPs and the scope of the changed conditions. When will the Forest Service, realistically, reengage in a public process and dedicate the needed resources to revise the NWFP after completing this amendment? The Pacific Northwest should not have to wait another 30 years to make necessary and meaningful changes to land management plans governing over 24 million acres of publicly-owned, federally-managed land.

DTO also notes while the NWFP is being amended, the Forest Service is also seeking to amend all land management plans in the United States – 128 plans –

simultaneously with a focus on protecting old growth across 193 million acres. The NWFP itself is an amendment to 17 land management plans in the Pacific Northwest. This means the Forest Service is proposing to amend (NWFP amendment) an amendment (NWFP) to land management plans, while pursuing a nationwide amendment to the same management plans all at the same time.

The Forest Service should consider sequencing and prioritizing plan amendments, rather than stacking multiple plan amendments on top of land management plans. Or, more productively, the Forest Service should reconsider and initiate a NWFP revision.

PERSPECTIVE ON THE NOTICE OF INTENT FOCUS POINTS

The changed conditions, and associated need for change, listed in the NOI are well documented; primarily in the 2018 Synthesis of Science to Inform Land Management Within the NWFP Area, routine NWFP monitoring reports, and the 2020 *Bioregional Assessment of Northwest Forests* (BioA) and its 2021 Supplement. The need for change identified in the NOI has compelled the Forest Service to focus its Amendment on the following items:

- Improvement to fire resiliency.
- Sustainability of mature and old growth forests.
- Climate change adaptation.
- Incorporation of indigenous knowledge.
- Sustainability of local communities.

DTO agrees these focus points, and others, need improvement and modernization. Below we provide perspectives on each focus point and conclude with technical comments and recommendations. The draft environmental impact statement for the NWFP amendment must take a hard look, analyze, and respond to the below information.

Improvement to fire resiliency

There is consensus among scientists, stakeholders, and land managers that the most significant existential threat to western forests is catastrophic wildfire (followed by mortality caused by disease and insects). This threat affects the persistence of nearly every renewable resource that the Forest Service is tasked with managing, including mature and old growth forests, a sustainable supply of timber, wildlife habitat, carbon storage, air quality, and water quality – not to

mention recreational opportunities, and protecting communities, lives, property, and infrastructure.

The Forest Service has documented this threat repeatedly, most recently in the 2022 Wildfire Crisis Strategy that proposed the ambitious goal of treating an additional 20 million acres of National Forest System (NFS) land over the ensuing decade to address the wildfire risk. Nearly every single vegetation management project in the NWFP area over the past five to ten years includes a primary purpose of improving wildfire resiliency. Yet many National Forests continue to struggle with timely implementation at the scale, scope, and intensity that is desired. LMP factors contributing to this challenge of appropriate “pace and scale” must be addressed in the amendment if the Forest Service truly hopes to effectively bend the curve of the wildfire crisis.

A 2021 study concluded that “fire-suppressed forests that are well outside their historical range of variability are prone to severe fire and are also preferred by many forest-dependent wildlife species. Treatments within these forests are likely to reduce severe fire extent and therefore provide greater long-term benefits to species like the spotted owl.”¹ Effective fire exclusion has altered natural fire return intervals and many areas have missed two to five fire cycles resulting in an elevated level of forest biomass density. This biomass appears in many forms including small diameter trees and brush and large diameter trees. The Forest Service must remove this accumulated biomass and fuel loads regardless of its size if it wishes to create forests that are resilient to future wildfire, and it must complete this removal prior to the use of prescribed fire as a fuels reduction tool.

Another 2021 study concluded that “thinning without prescribed fire significantly reduced potential crown fire immediately following thinning and also moderated surface modeled fire behavior beginning 2–3 years following thinning. Fuel reduction and fire risk management objectives can be met with mechanical thinning alone for a number of years. Prescribed fire is likely necessary to extend the effectiveness of mechanical thinning after significant tree or shrub

¹ Jones, Gavin M., et al., *Forest Restoration Limits Megafires and Supports Species Conservation Under Climate Change*. 2021. The Ecological Society of America. Front Ecol Environ 2021; doi:10.1002/fee.2450.

regeneration.”² This study supports the need for mechanical thinning *prior to the introduction of fire*.

Ultimately, the amendment must deliver changes to the NWFP that enable managers to implement mechanical thinning across a wide range of forest types to improve fire resiliency. This must occur at a large scale prior to the introduction of prescribed fire.

DTO estimates that approximately 40% of the Umpqua National Forest has burned in the last 20 years – much of which was at moderate to high intensity. Much of these acres were also either actual “old growth” or Late Successional Reserves. Retention of hundreds of thousands of acres of standing snags across the Umpqua National Forest poses a very serious risk of re-burn that will undoubtedly threaten human life and further decimate wildlife, habitat and water quality – not to mention remaining old growth stands.

Sustainability of mature and old growth forests

DTO supports healthy and productive forests of all seral stages, including mature and old growth, but also early seral and mid-seral. However, it is puzzling to us why the proposed amendment focuses exclusively on two specific seral stages that, based on monitoring reports and routine assessments, seem to be stable or increasing.

An April 2023 report titled *Old-Growth and Mature Forest: Definition, Identification, and Initial Inventory on BLM and Forest Service Lands* made the following conclusions:

- Old-growth and mature forests combined cover *the majority of* Forest Service and BLM forest lands.
- Old-growth and mature forests are generally widely distributed geographically and across land use allocations, with old-growth

² Johnston, James D., et al., *Mechanical thinning without prescribed fire moderates wildfire behavior in an Eastern Oregon, USA ponderosa pine forest*. 2021. *Forest Ecology and Management*. 501 (2021) 119674.

covering 18% and mature forest covering 45% of forested Forest Service and BLM lands.³

In July 2020, the Forest Service completed a BioA to inform options to efficiently and effectively update plans. That assessment, and its 2021 supplement, concluded that:

- Old-growth forest is generally considered stable on federal lands and has increased slightly since 1993, providing the abundance, diversity, connectivity, and availability needed to support ecosystem functions and specific old-growth-dependent species in the BioA area.⁴

(The BioA Supplement categorized the “conservation of dense, multi-layered, old growth forests” under the heading “What is Working Well.”)⁵

Routine NWFP monitoring generates 5-year reports that assess the status of multiple resources for NFS land in the Pacific Northwest. The most recent, the 25-year report, was published in 2022 and assessed the status of these resources from 1994-2018. Assessment of old growth forests was analyzed in a document titled *The First 25 Years (1994–2018): Status and Trends of Late-Successional and Old-Growth Forests*. That assessment concluded that “trends in older forest are stable to slightly increasing. These levels are due to losses of older forests in dry ecosystems due to wildfire balanced by gains in older forests in moist ecosystems.”⁶

In addition to these sources documenting positive trends for both mature and old growth forest, the current NWFP has an entire LUA solely dedicated to the “enhancement and protection of late-successional and old-growth forest ecosystems” called Late Successional Reserves (LSRs). It should also be noted

³ U.S. Department of Agriculture, Forest Service, *Old-Growth and Mature Forest: Definition, Identification, and Initial Inventory on BLM and Forest Service Lands Fulfilment of Executive Order 14072 Section 2(b)*. 2023.

⁴ U.S. Department of Agriculture, Forest Service, *Bioregional Assessment of Northwest Forests* (2020).

⁵ U.S. Department of Agriculture, Forest Service, *Supplemental Report to the Bioregional Assessment of Northwest Forests* (2021).

⁶ Davis, Raymond J. et al., *Northwest Forest Plan—The First 25 Years (1994–2018): Status and Trends of Late-Successional and Old-Growth Forests* (2022). Pacific Northwest Research Station, General Technical Report PNW-GTR-1004.

that the vast network of riparian reserves is generally managed in alignment with LSR objectives.

On top of these two LUAs and others, there are over nine million acres of land designated by the U.S. Fish and Wildlife Service (FWS) as a Critical Habitat Unit (CHU) for the northern spotted owl (NSO). The Forest Service is not permitted to implement forest management treatments that destroy or adversely modify critical habitat (Endangered Species Act (ESA) Section 7(a)(4)). This statutory requirement typically prohibits the removal or degradation of forests that support suitable NSO habitat, which is generally aligned with mature and/or old growth forest seral stages. To adhere to the ESA, the Forest Service is also prohibited from jeopardizing the continued existence of listed species, including the NSO. Through project-level consultation with FWS, the Forest Service modifies proposed vegetation management treatments to avoid such jeopardy guided by the Revised Recovery Plan (Recovery Plan) for the NSO. These modifications often result in the deferral of treatments that would remove or degrade forests that support suitable NSO habitat.

One component of the Recovery Plan for the NSO that drives this project-level consultation is particularly relevant to the NOI's focus on mature and old growth forests. The Recovery Plan identifies 33 Recovery Actions. These Recovery Actions address a range of actions and protection measures that FWS considers during project-level consultation with federal land management agencies. One of these, Recovery Action 32, states the following:

*Because spotted owl recovery requires well distributed, older and more structurally complex multi-layered conifer forests on Federal and non-federal lands across its range, land managers should work with the Service as described below to maintain and restore such habitat while allowing for other threats, such as fire and insects, to be addressed by restoration management actions. These high-quality spotted owl habitat stands are characterized as having large diameter trees, high amounts of canopy cover, and decadence components such as broken-topped live trees, mistletoe, cavities, large snags, and fallen trees.*⁷

⁷ U.S. Fish and Wildlife Service. 2011. *Revised Recovery Plan for the Northern Spotted Owl (Strix occidentalis caurina)*. U.S. Fish and Wildlife Service, Portland, Oregon. xvi + 258 pp

Every stand proposed for silvicultural treatment on every vegetation management project within the range of the NSO goes through the RA32 “filter.” The Forest Service, in consultation with FWS, assesses every stand to determine if it meets the parameters in RA32 for “older and more structurally complex multi-layered conifer forests.” These parameters generally align with “old growth” forests. Application of RA32 is described on page III-43 of the Recovery Plan as follows: “Maintain and restore the older and more structurally complex multilayered conifer forests on all lands (see Recovery Action 32 under Listing factor E).” Therefore, when these RA32 stands are identified, they are typically deferred (“maintained”) from treatment.

Regarding application of RA32, the Recovery Plan states that “on-the-ground application of this action has been, and continues to be, implemented on the west side of the Cascades on Federal lands as part of the level 1 team consultation process since shortly after the 2008 Recovery Plan was finalized. Our recent experience reinforces that the BLM and Forest Service are aware of the conservation value of this recovery action and have been proactive and collaborative in the application of Recovery Action 32.”

The amendment should explicitly and specifically clarify what the Forest Service is solving for. The Forest Service should explain what is biologically appropriate and sustainable, especially given the expected and predicted stressors of climate change and how forest types, species, and geographic distributions will vary in the coming decades.

There is clear consensus among scientists, stakeholders, and land managers that the most significant threat to western forests of all seral stages (including mature and old growth) is **catastrophic wildfire, insects, and disease**. Any amendments made to the NWFP designed to improve the “sustainability” of mature and old growth forests should be focused on proactively addressing the risk for loss of these ecosystems to catastrophic wildfire through strategic, targeted, accelerated active forest management to reduce fuel loads.

Active management strategies must include thinning, timber harvests, fuel breaks, maintained and safe transportation routes for firefighters, prescribe burning, improvements in the detection of wildfire starts, and aggressive suppression tactics near and in at-risk landscapes – just to name a few. A NWFP amendment

should directly authorize and encourage the use of these tools and make their implementation easier, safer, and faster to match the scale of the wildfire and forest health crisis on NFS lands.

Incorporation of indigenous knowledge

DTO membership includes three federally recognized tribes who have been, continue to be, and will be impacted by the NWFP and subsequent amendment. DTO recognizes and condemns the total failure of the federal government to meaningfully include, engage, collaborate with, and incorporate Tribes in the development and implementation of the NWFP. This must be addressed and reconciled in an NWFP amendment.

The NWFP amendment must go beyond “incorporation” and “inclusion” of indigenous knowledge. The Forest Service must provide and analyze clear, specific, tangible actions that include, but are not limited to, *co-stewardship* and *co-management* of NFS lands within the NWFP area.

Procedurally, the Forest Service should provide individual, government-to-government consultation with all affected and historically relevant Indian tribes within the area of the Northwest Forest Plan.

Sustainability of local communities

The forest products sector has helped shape the shared identity, infrastructure, workforce, and rural economies across the range of the NWFP for a century and continues today. That statement is most true here in Douglas County, Oregon.

Recent analysis conducted by the Forest Economic Advisors shows that every million dollars in timber sales generates 12.3 direct jobs, 15.5 indirect jobs, and 7.3 induced jobs.⁸ The direct, indirect, and induced jobs created by active forest management span multiple sectors and industries, including logging, manufacturing, transportation, engineering, road building, construction, other trades, and retail.

⁸ Referenced in “Unveiling the Economic Impacts of the Timber Industry,” January 23, 2024. Found at: [Unveiling the Economic Contributions of the Timber Industry - LANDTHINK](#)

The Forest Service estimates that the timber industry contributes approximately \$200 billion annually to the U.S. economy, accounting for a full one percent of the country's entire GDP. This productivity is directly connected to economic growth at the national and local levels, and enables additional private and public investments in infrastructure, education, and other essential public services.

Yet, the NWFP led to dramatic declines in federal timber supply (over 80% from previous levels) and – combined with other dynamic economic forces – contributed to the loss of forest sector infrastructure and related supply chains, family-wage jobs, and critical revenues that support public services such as education, roads, law enforcement, mental health, search and rescue, and public safety. Now, more than ever, the stability and growth of the forest sector and workforce are needed to help the Forest Service address its forest health and wildfire crises impacting more than 60 million acres on the NFS.

The Socioeconomic chapter of the Science Synthesis notes that “increases in federal timber supply may lead to expansion in lumber production and hiring of mill employees if timber supply is constrained, demand for lumber products is strong, and mill capacity is underutilized.”⁹ All three of these factors are true in the Pacific Northwest.

Supply constraints

The timber industry in the range of the NWFP continues to be supply-constrained. Predictions for the future of this supply are not encouraging either. A 2022 report by the Beck Group considered the likely impacts to future timber supply in the Pacific Northwest as a result of multiple factors, including, but not limited to, the 2020 Labor Day fires in western Oregon impacting private industrial forestlands, the Oregon Private Forest Accord, changes to the Western Oregon Habitat Conservation plan, and changes to the Washington Department of Natural Resources sustainable harvest calculation and Habitat Conservation Plan.

The ***Labor Day fires*** in Oregon burned over 425,000 acres of private industrial forestlands, 268,000 acres of that total burned at high severity. The Beck Group Report estimated Oregon harvests will decline by seven billion board feet over the

⁹ USDA, Forest Service, *Synthesis of Science to Inform Land Management Within the Northwest Forest Plan Area*. 2018. Pacific Northwest Research Station. General Technical Report, PNW-GTR-966 Vol 3.

next 40 years. That's an average of 175 million board feet/year that was expected to be available to the local infrastructure. The total economic damage is estimated to be \$5.9 billion with the loss of 1,925 jobs in the forest sector. These are just the economic and timber supply impacts for *one* fire season on *one* land base, and does not account for more recent fires and timber supply impacts.

The Oregon *Private Forest Accord*, a compromise struck by members of conservation groups and private forestland owner representatives, has and will lead to changes in riparian management on the same industrial – and other private – forestlands. The Private Forest Accord is expected to reduce timber supply from Oregon's industrial forestlands by an estimated 5-10% annually. This reduction could be as high as 270 million board feet per year, and lead to the loss of 3,000 private sector jobs.

The *Oregon Department of Forestry* is undergoing a process to make changes to its Habitat Conservation Plan (HCP) covering western Oregon state forests. Recent analysis suggests the final HCP could reduce timber harvests on state lands in western Oregon by 40%, with a \$13-18 million annual impact to county revenues that support basic services.¹⁰

Combined, the Beck Group Report concluded that annual harvest in Oregon and Washington will likely fall by more than 490 million board feet per year over the next forty years costing 5,390 jobs associated with seven mills.¹¹ All of these factors impacting timber supply in the range of the NWFP are occurring right now and at the same time.

The above factors and impacts are *in addition* to the significant timber supply reductions on federal lands due to the NWFP. As the Forest Service considers an amendment, it must consider and analyze how an amendment will impact timber supply and the remaining forest sector infrastructure, associated supply chains, workforces, and county revenues – and how those changes will impact the agency's ability to achieve its desired conditions and outcomes on NFS lands within the NWFP area.

¹⁰ *Analysis from Oregon Capital Chronicle, December 2023, found at: <https://oregoncapitalchronicle.com/2023/12/08/habitat-plan-for-western-state-forests-could-cost-counties-17-million-a-year-in-timber-revenue/>

¹¹ [Are You Planning for the Reduction in Northwest Timber Supply? \(beckgroupconsulting.com\)](#)

Underutilization of milling capacity

The underutilization of current milling capacity can be best illustrated by considering recent mill closures. In 2016, Rough and Ready permanently closed their mill in Cave Junction, Oregon after 90 years in business. The owners cited difficulty of acquiring logs through federal timber sales as a primary reason for closure.¹² Rough and Ready operated in Josephine County, 70% of which is federally managed. In 2019, Swanson Group (a DTO member company) permanently closed its sawmill in Glendale, Oregon. The company's President and CEO identified timber supply shortages as the primary reason for the closure. In particular, he noted the lack of supply from the federal government.¹³ In 2023, Hampton Lumber announced the closure of their sawmill in Banks, Oregon. Once again, the company cited log supply as a major factor for the closure.¹⁴

The Science Synthesis also notes that “increased federal timber harvest might improve the well-being of local wood products producers and private forest landowners in situations in which all local milling capacity is in danger of closing, and the addition of federal timber supply helps to keep mills above the tipping point of having to close operations.” The documented flow of mill closures in the region certainly indicates that additional milling capacity is in danger of closing.

The existing milling infrastructure is supply-constrained and in danger of facing additional contractions and closures despite escalating public demand for wood products. It is also clear that these closures would have significant impacts on rural economies across the range of the NWFP. The NWFP amendment must acknowledge and address these realities as it assesses the role of timber product supply from federal forest land in the range of the NWFP.

TECHNICAL COMMENTS AND RECOMMENDATIONS

The Bureau of Land Management (BLM) finalized its resource management plans (RMPs) for the O&C Lands in Western Oregon in 2016. The RMPs made

¹² [After 90 Years A Southern Oregon Mill Shuts Down - OPB](#)

¹³ [Swanson to close Glendale sawmill | Local Biz | nrtoday.com](#)

¹⁴ [Hampton Lumber's sawmill closure in Banks may ripple into city, county funding woes | News | hillsboronewstimes.com](#)

significant changes to federally managed forests immediately adjacent to Forest Service lands in western Oregon, are generally the same forest type, and were previously managed under the standards and guidelines of the NWFP.

The RMPs reflect the most up-to-date plan revisions on federal forests in the Pacific Northwest and went through consultation with the FWS and National Marine Fisheries Service for endangered and threatened species. While legal questions remain about the underlying statutes governing the O&C Lands (the timber-dominant O&C Act of 1937) and NFS lands (the multi-use focused NFMA),¹⁵ the Forest Service should adopt at least three changes in a NWFP amendment from the BLM RMPs:

- 1) Modify Riparian Reserve buffers consistent with the best available science.
- 2) Eliminate duplicative and unnecessary Survey and Manage protocols.
- 3) Clarify direction for land use allocations dedicated to sustained yield timber harvests.

Other Arbitrary and Inflexible Standards and Guidelines that Require Modernization

Address the 80-year age limit to active management in Late Successional Reserves

A key NWFP standard that must be modified or removed is the prohibition of timber harvest in stands over the age of 80 years in LSRs west of the Cascades and north of the Klamath Province.

This is an arbitrary and unscientific standard that can impede important, needed, proactive forest management work.

In making this recommendation, the forest products industry has often been accused of “wanting to return the Forest Service to the old days” of “clearcutting old growth.” That’s false. The Forest Service and its experts must be able to respond to unique threats impacting dynamic, at-risk ecosystems at the appropriate time, scale, and pace. Placing an arbitrary limit on management

¹⁵ *Am. Forest Res. Council v. United States*, 77 F.4th 787 (D.C. Cir. 2023), *pet. for cert. filed*, No. 23-524 (U.S. Nov. 17, 2023).

options has not helped and will not help the Forest Service address the greatest threats to NFS lands and surrounding communities: wildfire, insects, and disease.

There is growing scientific consensus and empirical evidence that “one size fits all” standards applied across a vast range of ecological conditions is flawed. The 80-year age limit applied to the NWFP represented an *estimate* of when late seral forest conditions *generally* begin to establish. Not only does this estimate not apply to the vast range of forest types across the NWFP area, but its existence in LMPs significantly hampers the agency’s ability to effectively manage certain stands to meet LSR desired conditions.

First, dry forest types that typically dominate the areas east of the Cascades and the Klamath Provinces also occur in those Provinces west of the Cascades that must adhere to the 80-year limit. Second, many mid-seral forests that would benefit from density management treatments to accelerate and improve the development of late seral habitat are over the age of 80. The mid-seral stage of forest succession does not automatically end when a stand reaches 80 years of age. Every forest stand is unique and successional stages progress at different ages dependent on a myriad of factors, including site productivity, past management activities, and forest species composition. There are many stands less than 80 years of age that do not warrant density management to meet LSR desired conditions and there are many stands over 80 years of age that do.

The Forest Service must reconsider, revise, or remove the 80-year age limitation on active forest management in LSR LUAs because this limitation hinders the agency’s ability to effectively reduce stand densities and mitigate the risk of high-intensity and high-severity wildfire.

Address ambiguities and provide specific guidelines for post-fire timber salvage.

Dead trees do not sequester carbon, they can only release it over time. This fact should be considered as part of the amendment process as it pertains to the need for climate change mitigation. Following high-severity wildfire, the Forest Service can take two general approaches: passive or proactive. The passive approach amounts to leaving the dead trees on site to deteriorate and emit a portion of their stored carbon back into the atmosphere and rely on natural regeneration of trees to reforest affected acres. The proactive approach amounts to recovering dead trees, storing their carbon in long-lasting wood products

(reaping the benefits of substitution outlined above), and replanting affected acres with new trees capable of sequestering additional carbon.

DTO is not recommending the Forest Service pursue timber salvage on every acre of the NFS lands within the NWFP area after a wildfire or disturbance.

The agency should prioritize recovery opportunities within Matrix LUAs, along roads and critical public access routes, and for public safety purposes. The Forest Service must also take a hard look at actions for post-fire recovery on other LUAs that ensure NFS lands are regenerated to contribute to environmental and socio-economic outcomes, climate mitigation goals, and emergency response and public safety.

Currently, there is no clear direction for timber salvage on Matrix land in the NWFP. Of course, there are several restrictions that address snag and down wood retention that would apply to post-fire timber salvage, but not direction on whether or not to conduct such salvage. Therefore, we propose that the amendment include the following direction for lands designated as Matrix (or whatever future LUA is called where timber management is a goal):

Following disturbances, prioritization should be given to the harvest of damaged and killed trees. This harvest will be designed to reduce the risk of carbon emissions from dead trees, remove hazards, and to ensure the effective reforestation of impacted acres with young vigorous trees capable of high levels of new carbon sequestration.

Encourage active management to restore and improve resiliency of LSRs

As already discussed, the most significant threat to the persistence of any forest seral stage, including late-successional and old growth, is wildfire (followed by mortality due to disease and insects). The Forest Service should respond to this clear threat by amending the direction for the LSR LUA to *encourage active forest management rather than discourage it*. Current direction in the NWFP is applied to two provinces: West of the Cascades, and East of the Cascades and in the Oregon and California Klamath. We believe that the amendment should reassess the effectiveness of these Provinces as currently mapped and consider modernizing the existing language for all Provinces to respond to the elevated risk of wildfire.

The current LSR direction for silviculture in the “West of the Cascades” appears as follows:

“Thinning may occur in stands up to 80 years old regardless of the origin of the stands. The purpose of these silvicultural treatments is to benefit the creation and maintenance of late-successional forest conditions.”

We have already addressed our concerns with the current 80-year age limit for active forest management. Beyond that concern, we recommend that the Amendment strengthen this direction to **encourage** active forest management in LSR rather than **allow** active forest management. DTO proposes the following amended language:

“Thinning should be considered as a tool to accelerate the development of late-successional forest conditions, improve existing late-successional forest conditions, or protect existing late-successional forest conditions from loss due to disturbance. Such treatments can occur in any stand that land managers deem necessary regardless of the origin of the stands.”

DTO also proposes:

- The amendment partition the Oregon Western Cascades Province into a North segment and a South segment. The North segment would remain in the moist-forest category while the South segment would transition to the dry forest category.
- The amendment provide a clear variance for dry-forest ecosystems identified within the moist-forest Provinces. Such a variance could be contingent on review by the Regional Ecosystem Office.
- Amending the guideline language related to the dry Provinces to encourage active management more effectively. Specifically, the following edits to current guidelines found on page C-13 of the NWFP Standards & Guidelines should be considered and incorporated in an amendment:

Silvicultural activities aimed at reducing risk shall focus on younger stands and overly dense stands of all ages in Late-Successional Reserves. The objective will be to accelerate development of late-successional

conditions in younger stands while ~~making the future~~ making stands of all ages less susceptible to natural disturbances.

~~While Risk-reduction efforts should generally be focused on young~~ applied to stands of all ages and focused on the protection of existing late-successional forest habitat. ~~activities in older stands may be appropriate.~~

Restore the Intent of Adaptive Management Areas, or Reallocate to new or existing LUAs

The original vision for the Adaptive Management Area (AMA) LUA has never been realized. Designed to “encourage the development and testing of technical and social approaches to achieving desired ecological, economic, and other social objectives” these 1.5 million acres have, much like Matrix land, been managed as just another component of the LSR system.

The forest sector strongly supports the concepts and goals of adaptive forest management: test, monitoring, learn, and adjust. Adaptive management is a tenant of good stewardship and is even more relevant and needed to address the stressor of climate change. We must continue to learn and adapt our approaches on NFS lands just as these dynamic ecosystems change and adapt.

DTO recommends three alternative approaches to future management of AMAs through a NWFP amendment:

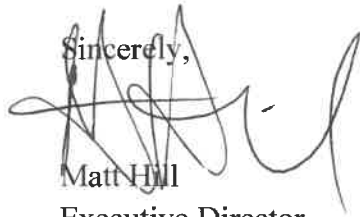
- 1) ***Identify*** standards and guidelines and other implementation roadblocks to achieving the original goals of the AMAs as envisioned in the NWFP, and ***simplify and clarify*** those standards and guidelines in an amendment.
- 2) ***Engage and include*** Tribes and Indigenous peoples to consider co-stewardship and co-management approaches within AMAs that meet the objectives and intent of the Northwest Forest Plan and tribal treaty rights.
- 3) ***Reallocate*** the acreage within AMAs to the LSR and Matrix land use allocations. Under this scenario, and if the Forest Service places further restrictions on Matrix LUAs through an amendment, the Forest Service should consider reallocating acreage from the AMAs to the Matrix LUAs to accomplish sustained yield timber harvest goals as recommended above. Under no scenario, should an amendment further reduce the total acreage available for sustained yield timber harvest under a NWFP amendment for all the reasons described above.

CONCLUSION

As outlined above, the NWFP amendment process provides an opportunity to address substantial current and future threats to our forests and all the values they provide to society. An NWFP amendment should modernize the current passive management paradigm focused on species management to a proactive, flexible, science-based, adaptive management paradigm that focuses on overall forest health and resiliency. If we take care of our forests, they will take care of us and all that depend on them. At the same time, an NWFP amendment must provide clarity, predictability, and accountability in management across land use allocation to rebuild trust and credibility with the public, Tribes, impacted communities, and the businesses and workforces tied directly to the implementation of the NWFP.

Thank you for your consideration and the opportunity to provide comments.

Sincerely,

A handwritten signature in black ink, appearing to read "Matt Hill", written over the typed name.

Matt Hill

Executive Director