



# Oregon

Tina Kotek, Governor

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## Oregon Department of Forestry Response to Northwest Forest Plan Amendment

Dear Regional Forester Buchanan,

On behalf of the Oregon Department of Forestry (ODF), we are responding with comment to your notice of intent to prepare an amendment to the 1994 Northwest Forest Plan (NWFP).

Forests are the predominant ecological feature of Oregon and are vital to supporting cultural, ecologic, social, and economic values. The majority (61%) of the forestland in Oregon is held in federal ownership, with the Forest Service accounting for over 14,049,000 acres (47.3%) of the 29,725,000 acres of forestland in Oregon. This extraordinary acreage and proportion of ownership underlines the significance that management of National Forests holds with respect to realization of Oregon's forest values, state directives, legislation, and regional forest plans. Accordingly, amendment of the Northwest Forest Plan is of enormous consequence to Oregon's forests and citizen's well-being, sustainability, and values fulfillment.

The Oregon Department of Forestry endorses the five NWFP interrelated areas of focus identified as preliminary need to change:

- *Improving fire resistance and resilience across the NWFP planning area,*
- *Strengthening the capacity of NWFP ecosystems to adapt to the ongoing effects of climate change,*
- *Improving conservation and recruitment of mature and old-growth forest conditions, ensuring adequate habitat for species dependent upon mature and old growth ecosystems and supporting regional biodiversity,*
- *Incorporating Indigenous Knowledge into planning, project design, and implementation to achieve forest management goals and meet the agency's general trust responsibilities,*
- *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.*

These topic areas align with our state's priority forest health goals as outlined in Oregon's State Forest Action Plan, Oregon's Vision for Federal Forestlands, Oregon's 20-Year

Landscape Resilience Strategy, and Oregon Board of Forestry and department planning process and documents.

Beyond the topic areas identified in the need for change, the Department requests that the following considerations be included in the scope of the environmental impact statement:

1. **Formal Recognition of State Agencies in planning and amendment process.** As emphasized in our state statutes, we request that the Oregon Department of Forestry be officially recognized as a cooperating agency in the NWFP amendment process. In the spirit of Shared Stewardship, our active participation is essential for effective collaboration and accepted outcomes.
2. **Post-Fire Restoration Planning:** Acknowledging climate change is increasing the threat of catastrophic wildfires, we urge the inclusion of post-fire management guidelines for all land use allocations within the NWFP. Providing clear direction on recovery actions will ensure federal forests are retained in forested condition and will help to identify where to direct resources.
3. **Climate Change Integration:** The amendment process presents an opportunity to integrate climate change threats, assessments, and adaptation strategies. We advocate for the inclusion of climate vulnerability assessments and flexible guidelines for adaptive management to address changing conditions. The length of time between revisits to the NWFP highlights that the amendments should be forward looking, incorporating climate models and realistic assumptions of what the regions forests will look like in the future. Special consideration should be taken around species distributions, likelihood of extreme events, and increasing risks from both biotic and abiotic factors.
4. **Emphasis on Watershed Function:** Given the importance of water resources, we encourage the NWFP amendment to strengthen watershed resilience and prioritize aquatic restoration actions. USFS and BLM lands in Oregon account for 43% of the state's drinking water source areas. Integrated projects should aim to manage forests holistically, benefiting drinking water sources, ecosystems, and threatened species.
5. **Fully consider integration of the Forest Service's Wildfire Crisis Strategy and Scientific Analysis into NWFP amendment:** Although there is a difference in fire frequency and severity between moist and dry forests with the NWFP area, recent events, and new scientific publications show that moist forests have received more frequent wildfire than previously thought. ODF hopes this amendment acknowledge the role fire and other disturbances historically played in both moist and dry forests

and reintroduce these disturbance regimes through prescribed/indigenous burning and through mechanical and non-mechanical treatments. Also ensure the top priority for the Forest Service, the wildfire crisis, is incorporated into the NWFP amendment.

6. Habitat Conservation Plans (HCPs) for non-Federal Lands: Part of the key habitat conservation measures being pursued by the department are the development of an HCP for ODF-managed lands (~3% of Oregon's forests). This process is well underway and has received substantial public input. Additionally, the Private Forest Accords, negotiated between conservation and forest industry groups, requires the department to work towards the establishment of an aquatic focused HCP for non-Federal lands in Oregon. As these are substantial efforts taking place, it would be beneficial to consider a holistic approach between the involved agencies and to build off of each other's efforts.
7. Differentiated Management for Forest Types: Recognizing the diverse ecosystems within Oregon, we stress the importance of different strategies for frequent-fire forests compared to westside forests. Amendments should clearly delineate guidelines for these distinctions to align with ecological needs and legislative mandates.
8. Integration with Executive Order (14072): The NWFP amendment should align with the goals outlined in Executive Order 14072, ensuring a cohesive approach to old growth and mature forest conservation. Utilizing updated mapping tools and data will contribute to more effective decision-making and be used to inform analysis and revision of land use allocations and boundaries to better align the existing condition of forests to our desired long-term management goals and help managers more effectively meet the multiple objectives of the NWFP.
9. Commitment to Economic and Social Goals: Alongside ecological objectives, the NWFP should assess progress towards economic and social goals. Recognizing the symbiotic relationship between healthy forests and vibrant communities, we propose a comprehensive regional and forest-specific suite of economic objectives. Specifically, we recommend incorporating clear and attainable harvest volume goals as part of this amendment. These goals should be clear and predictable so communities can plan and adjust. Moreover, The NWFP amendment should re-address initial principles, recognize, and address short-comings and challenges in meeting economic and social objectives, and articulate a pathway for support of communities. In this regard, a predictable and meaningful supply of timber and forest products is important to sustain a viable infrastructure in the region, critical to forest management function and capabilities. Additionally, the NWFP

amendment should designate clear land management allocations where management for production of forest products and forest by-products will occur. A coinciding update of projections by forest for sustained timber supply should be considered as well.

10. **Inclusive Decision-Making:** To ensure diversity and inclusivity, we recommend the active involvement of tribes, states, counties, and relevant partners in NWFP interpretation and implementation processes. Inclusive representation will contribute to a more equitable and effective outcome.

Looking forward to the next decades of the NWFP implementation and direction, we hope that the amendment will provide levels of certainty in federal forest management as well as being holistic and inclusive in process and outcomes. Climate change will influence and impact all the aspects of the forest environment and the people that surround it. These influences are now spreading from the forest to the heart of urban areas, with increasing amounts of smoke impacting communities across the board. Please take this opportunity to work to strengthen resilience and biodiversity efforts in the planning area.

The NWFP permits adaptive and dynamic approaches to an exceedingly complex ecosystem. A preferred consideration within the amendment process would be explicit instruction and guidance for implementation and assistance to each forest within the NWFP, to support implementation, collaboration function, and realization at the state and forest level that would allow for Local Land Manager Discretion: To the extent possible, allow for local land manager (forest-level) flexibility in the NWFP amendment.

As the NWFP amendment progresses, the department looks forward to collaborative efforts that prioritize the health and resilience of Oregon's forests. Thank you for considering our comments and we anticipate continued partnership throughout this critical planning process.

Sincerely,

A handwritten signature in black ink, appearing to read 'Cal Mukumoto', with a long, sweeping horizontal line extending to the right.

Cal Mukumoto

Oregon State Forester