**Northwest Forest Plan Amendment #64745**

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Regards,  
The Northwest Forest Plan Amendment Team

I am adding a last-minute comment to the above letter. Please consider. I am concerned that it is not clear whether there are any on-the-ground implementors on the committee. Rather the committee is a mixture of multiple stakeholders. I realize Jerry Franklin was one of the 5 who helped with the development of the NWFP. However, there were hundreds that were challenged with implementing on a daily basis at the ground level. I would hope that the committee would reach out to those who wrestled with the implementing the Standards and Guides in the field, worked with their field office Interdisciplinary Teams interpreting the NWFP, addressing Survey and Manage schedules etc... and all the myriad of challenges of the NWFP on a daily and field level. Thank you.

February 2, 2024

To: US Forest Service

From: Mike Bechdolt, Consulting Forester/Retired BLM Forester

Subject: Northwest Forest Plan Amendment - Comments

To Whom It May Concern

I want to first recognize and thank all the various Teams and FACA Group for their efforts and sacrifices to date on their efforts toward amending the Northwest Forest Plan (NWFP). In addition, thank you for the opportunity to provide comments.

***Background:*** Note that I am a retired BLM Forester and presently a consulting forester that has worked in the California/Sierras (USFS 1973-1979), Oregon/BLM (1980-2012), Washington DC (Senior BLM O&C Forester 2012-2018) and assisted in developing three different BLM Resource Management Plans and implementing NWFP standards and guidelines for over 25 years. I was also a wildland firefighter for over 35 years. My comments below are based upon my experience, oversight, implementation and participation on how the two agencies have adapted land management policies and on-the-ground forest management since 1974 when I first started as temporary wildland fire fighter. I thank you for the opportunity to provide comments.

Note that I did watch part of the Webinar presentation on January 25th on progress and proposals to date regarding the NWFP amendment. I also watched much of the public NWFP FACA discussions on the proposed amendment on January 30th  and 31st. Thank you for the opportunity to allow the public to listen in and provide oral comments. Much appreciated.

I believe the following issues/questions/points would be helpful to consider and possibly include in your upcoming review and decisions. I understand that some or all of them were raised as I watch and listened in:

* ***Successes / Benefits / Monitoring Data***: In listening to the January 30th & 31st discussions, I rarely heard comments on the specific successes of the NWFP such as: Was there an increase in Mature Old Growth Forest habitat? Did the Riparian Reserves serve their purpose? What specific species benefited? In other words, what is presently working and considered a success under the NWFP. It seemed like many of the comments were critical of the NWFP. Obviously, per the discussions, improvements need to be made to the NWFP. It might be helpful to summarize somewhere and somehow the benefits and successes of the NWFP and recommend that they continue.
* ***Tribal Inclusion/Cultural Burning/ Stewardship Inclusion***: Based upon the live January 30th and 31st, 2024 oral public comments and follow-up FACA discussion, this was a central and paramount message. I commend the Team for making every effort to collaborate and include the Tribes. Specifically:
  + *Cultural Burning*: One of the repeated messages from the Tribes is their history of “cultural burning” as part of their lifeline to the land. As a wildland fire fighter and prescribed burn boss for years, the need for prescribed burning is immense and a proven and effective fuel reduction mitigation tool, particularly on the eastern fringe of the NWFP but also within the coastal and cascade mountain range and valleys. As the Tribe mentioned, fire also is an effective tool for meeting various biodiversity needs for plants and wildlife and the Tribe itself. For the prescribed burning program to expand and increase its successes, various stakeholders need to concurrently address challenges and issues outside the scope of the Amendment. Some of the prescribed burning challenges include; Industrial and Non-Industrial private landowner use of prescribed burning, non-agency Burn Boss liability protection (State of Oregon is addressing through legislation), cross boundary burning opportunities, expansion of prescribed burn capacity among private contractors, education of public on the benefits of prescribed burning, use of all acceptable and combination of fuel reduction treatments, review of smoke management regulations and modifications, authorized burn plans, etc... The present day smoke management guidelines limit prescribed burning to certain days to avoid smoke intrusions. What was not clear during the FACA discussion was whether the Tribes would have to comply with the same smoke management limitations and burn plan requirements as the Agencies (BLM & USFS). We have all experienced unintended smoke intrusions and disastrous escapes from prescribed fires. Hence the need for stringent policy implementing prescribed burns. In listening to discussions with Tribes, it seems that obviously the use of fire decades/generations/centuries ago was not as restricted. Hence my question, how will the Agencies and Tribes implement a prescribed fire program acceptable to all?
  + *Tribal Inclusion*: I fully support Tribal Inclusion as part of the Amendment… regretfully overlooked in the 1995 NWFP. What the new Amendment will look like depends upon the FACA group reaching a consensus for how to correct. As you work towards consensus, I challenge you to be sensitive to the points and tone of discussion that Travis and Laura brought up towards the end of Day 2 January 31st. I too felt frustrated by the “labeling” that seems to be directed at present day forest management agencies, staff, timber companies, foresters, wood products industry, responsible land managers, focused solely on “extraction” etc… The word “Colonial” abuse/trauma (not sure right terms) and extraction were used numerous times. I fully recognize and acknowledge the wrongs that have taken place historically. But it seems like those of us today that have given our lives, our careers, our passion, our energy for decades, and who love and want to conserve the forests as much as anyone including the Tribes… and have demonstrated to be responsible stewards of the land… are being personally blamed and held accountable for the past. It does not seem fair to blame the present-day generation of managers for past sins, yet many of the comments and the tone of the comments could be taken that way. One only must look at the outcome of World War II today. Are American families who lost thousands of lives to Germans or Japanese still blaming the present-day generation of those countries for their dear losses? My hope is that the FACA group consisting of multiple backgrounds can reach a consensus and recommendation based on the present-day makeup of the populations, interests, communities, treaty rights, passions and demands. If the FACA group is focused on ameliorating all the sins of the past, and not on the overall restoration of our forest ecosystems (per Jerry Franklin’s January 31 comments), it begs the question “what is more important, reparations for the sins or restoring our ecosystems?” The majority of foresters, staff, rural communities, etc.. that I have had the privilege to work with who live, work, play in those forests are not greedy “Timber Beasts or Bastards” or some other undesirable label, but they too want to live and work and enjoy and conserve the diversity of forest ecosystems as much as anyone. So, if possible, please try to change the tone of the discussion from blame to respect for all interests and work towards the restoration and sustainability of or ecosystems.

Recommendation: As a recommendation, like the agencies “Stewardship Contract” options (or some other authority), consider allowing the Tribes to enter into sole Stewardship Contracts (Contract not likely the right word) to manage certain allocations of the land if the Amendment retains land allocations but have input on all allocations.

* **Incorporation of Concurrent Old Growth Conservation Policy Decisions:**
  + ***MOG Recruitment Strategy –*** The Northwest Forest Plan addressed the MOG strategy and corresponding forest ecosystem benefits by setting aside land use allocations…Late Successional Reserves (LSRs). Under the proposed MOG amendment to the 128 USFS forest plans, it is unclear how “Mature” forests will fit into the “maintenance and recruitment” strategy. Similarly, under the NWFP, as Jerry Franklin mentioned on January 31st, the LSRs have embedded plantations (3+ million acres per Jerry Franklin January 31st) within the LSRs that could serve as recruitment for MOG. If the USFS keeps the current land use allocations, will the amended NWFP recruit MOG outside the current land use allocations or focus on the embedded plantation first?
* ***Other MOG Questions:***
  + *Salvage:* How will the Amendment address Salvage? I have personally worked in and adjacent to LSRs for years where little to no salvage was removed per Standards and Guides and/or subsequent litigation except along highways for safety (2020 Labor Days). Also, I have noted little to no reforestation taking place in the LSRs. During the 30th-31st discussions, one of the FACA members asked “Is a LSR managed as an older forest still “old growth” after a high severity burn areas?” This issue and any subsequent site prep/reforestation efforts after high severity fires needs clearer guidance in the Amendment.
  + *Reforestation -* While still working for the BLM as their senior O&C Forester, many of the LSR’s burned areas were not high priority sites for replanting. How will reforestation be prioritized and addressed in any of the Reserves (if kept) and the associated carbon benefits? Does the USFS have reliable data to determine whether sufficient natural regeneration is repopulating LSR stands that were never reforested/planted after high severity burns to assist them with this decision? I would ask the Team and FACA group to also focus on the post fire reforestation backlog that continues to grow. Successful reforestation is critical for carbon storage and lack of reforestation is a concern particularly after massive wildfires.

* **Carbon / Climate Change Concerns and Link To Reforestation Efforts-** A number of comments and concerns were raised and continue to be raised regarding climate change and carbon storage and the need to retain more of the mesic Pacific Northwest Forests for carbon reserves offset. The NWFP has a significant “Reserve” system of allocations (70+%) that not only benefits Old Growth ecosystems, but contributes to carbon storage and biodiversity goals mentioned during the FACA discussions. The Oregon Department of Forestry’s proposed Forest Management Plan (not final) and current BLM 2016 RMPs continue to set aside “Reserves” with the intent of benefitting not only forest ecosystems but carbon storage as well. I am concerned that the recommendations will include the requirement to reserve even more or all the remaining federal lands in the PNW as some oral comment alluded to for carbon offset to mitigate climate change thereby impact the remaining sustainable timber supply for our communities (as alluded to by Travis during the 30th & 31st FACA meeting). In lieu and setting aside even more “Reserves,” I would ask the Team and FACA group to look at the full spectrum of knowledge input around carbon storage in their decisions including: the science, on-going high severity wildfires, lack of or limited salvage and follow-up reforestation after fires, benefits of wood versus other products, etc… Reforestation in Late Successional Reserves under the Northwest Forest Plan is no longer a priority because often no salvage is allowed or is limited to only along access roads for safety reasons. Thousands of acres of LSR’s are not reforested after wildfires and where there are limited live seed trees still available. This often can result in subsequent brush fields for decades and residual fuel loading for subsequent wildfire eg…Tillamook Forest reburns. The Team should assess FIA plots over the past 20-25+ years in LSR’s and elsewhere across the western states where large fires have occurred and summarize whether any natural seedlings are coming in or whether the site was planted and was the planting successful. Essentially, the Team and FACA group should assess the carbon storage benefits pre versus post fire, with salvage versus no salvage and with reforestation versus no reforestation etc.. and any other combination of treatments and overall impacts to biodiversity needs.

* ***Clarification on Overriding Direction:***

The Propose Action in the December 29th MOG Notice of Intent stated “***the proposed action consists of plan components and other plan content that would be added to all land management plans. Existing plan components in all plans would remain in effect, and if existing plan components are more restrictive, the more restrictive direction would govern****.* “

During the FACA 30th & 31st Amendment discussions, there was some comments alluding to what Standard/Guide/Direction/Requirement would take precedent and/or trump. It would be beneficial for the NWFP Amendment to be clear on this issue. Will the final NWFP Amendment be more or less restrictive that the final MOG Amendment? What direction will take precedent: NWFP Amendment?, MOG Amendment? Tribal inclusion direction?

* **Other Administration Direction/Compliance**

A question was raised during the November 9th MOG call …”how will the Team integrate the President’s earlier EO (2021-30x30) with the MOG policy.” Is it necessary for the Team and NWFP FACA group to consider addressing this other Executive Order by the President to reserve 30% of our Federal Lands by 2030 in their final recommendations? Will this EO impact and influence the final recommendations in light of over 70% of the Federal lands are already Reserved under the NWFP?

* **Wildfire & Fuel Mitigation**

It would be helpful for the Team and NWFP FACA group to come to some critical agreement and consensus on how to mitigate wildfire severity through a combination of treatments including the use of prescribed fire in combination with thinning both commercial and non-commercial material. There is sufficient scientific evidence and empirical data and on-the-ground proof to show that a combination of both has been helpful to mitigate impacts. I sense a tremendous gulf between stakeholders and even science on this issue. Consensus must be reached first on this before further recommendation on actual implementation of prescriptions can be discussed. Simply using prescribed fire in untreated overstocked stands without first doing some understory mitigation through thinning has proven time and time again unsuccessful and in many cases killing the very MOG trees intended to be reserved. I have observed this again and again in my years implementing prescribed fire…if not implemented correctly… we injury and often kill the very trees we want to save. There is a time, place, and way to successfully use prescribed fire and we have the experts to apply and one of the most discouraging things to observe is when prescribed fire in not use correctly.

As mentioned above under “cultural burning,” the FACA group should also provide recommendations to the various stakeholders who authorize and provide oversight on prescribed burning including smoke management agencies, communities impacted by intrusions, agencies who authorize and certify Burn Boss Managers, contractors who implement prescribed burns, etc... A tremendous amount of education needs to occur with our general populations on the benefits of using prescribed burning combined with thinning to expand its use.

As a proponent and peddler of biomass utilization for over 30+ years resulting in utilization of tons of non-commercial biomass, the Team and NWFP FACA group can make one recommendation that would address multiple challenges and provide benefits across the region including wildfire mitigation, community stability, climate change, and carbon storage (reduce to the need to burn millions of tons of landing piles yearly). The NWFP region needs to recommend and address the lack of markets and technology for biomass (small logs, non-commercial material) and how to get it out of the woods responsibly, economically, and efficiently. Time and time again I have met with potential biomass investors that has resulted in an uneconomical investment portfolio due to federal government restrictions, unreliable power provision commitments, investment returns, and unreliable feedstock.

So I strongly encourage the Team and FACA committee to consider a recommendation for a review of the limitations on biomass utilization including potentially providing a funding source to potential investors and technologies to address our supply of biomass in the region.

* **Thinning/Selective Harvesting – The Need for A Stable Sustainable Harvest Land Base For Our Communities –** I have a concern on how the Team and NWFP FACA will address existing commercial harvest treatments like Thinning or Selective Harvesting on lands specifically allocated for sustainable and reliable timber production and on potentially other MOG stands if allowed such as for wildfire mitigation. As mentioned during the 30th & 31st meetings, the NWFP did not produce a sustainable and reliable supply of timber as projected for various reasons: unclarity or different in interpretations in the Standards and Guides; NEPA issues; various litigation decisions; changing Sensitive, T&E and/or ESA species direction and listings; and various other challenges. From my observation only and only my opinion, constant litigation seemed to come regardless whether the proposed treatment area was in the Matrix or not. Interest groups simply would not accept any commercial wood extraction for various reasons and looked for any and every mistake, hole, different interpretation in the NEPA and/or project proposal to stop the project. So, how will the Team and FACA group address this issue?

Community and economic investment and viability is often based upon a reliable supply of a resource. The present-day milling capacity in many regions has somewhat reached a balance between supply and demand, including in the Pacific Northwest under the Northwest Forest Plan after 30+ years of implementation ( however with a significant projection of a decrease in wood supply as presented by Travis on January 30th at lunch). New management policies and direction like those being considered concurrently under the Old Growth Amendment and under the Oregon Department of Forestry and Department of Natural Resources in Washington can have tremendous destabilizing impacts to communities, particular smaller communities dependent upon a reliable timber supply. The Team and FACA group, as much as possible within their authority, needs to assure that a sustainable and reliable supply of timber vital to so many American communities continues to be available and if feasible, insulate a sustainable supply from litigation if possible or even a reasonable request.

Adding to the above comment, and based upon years of discussions and briefings I was part of in the development of multiple BLM Resource Management Plans over the years with BLM leadership, I often heard from interest groups that once a forested stand was thinned (say at age 50 today) and subsequently reached a certain age (say age 80), then that forested stand would now be considered “Mature” and future management/harvest could now be limited based upon its now “Mature” classification simply by growing into an older age class. Essentially, any acre of land that grows into a “Mature” age class is no longer part of the “Matrix” or designated harvest land base. This type of thinking and reasoning contradicts the purpose of a sustainable timber supply. An agency simply cannot continue to reduce the land base and correspondingly provide the same sustainable supply of wood. The land base must remain static to provide a sustainable and reliable supply of wood.

* ***Implementation Challenges (Can Litigation Be Avoided?)***”

Below are my comments on the MOG Amendment and feel they are applicable to the proposed NWFP amendment as well. It is one thing to assess MOG inventory from GIS data using pixels and various attributes and inventory data to categorize and summarize stand data like age, height, diameter, etc… and I recognize and commend the MOG Teams efforts to express this national consolidated information and their efforts in defining MOG forests. On the other hand, as an on-the-ground implementor overseeing thousands of acres of harvesting treatments over multiple decades in and out of the Northwest Plan Region, I am very concerned how the field and district offices will settle the on-the-ground challenges and inevitable disputes with various interest groups face to face in the field on where and what to harvest under both the MOG Amendment and NWFP Amendment. Questions surely will arise such as;

* + How will Mature versus Old Growth stands be delineated (Flagged/Identified) on the ground in and out of land use allocations if designated?
  + How will individual Mature versus Old Growth Trees be identified in and out of land use allocations if designated?
  + Will it be by diameter? Will it be by age? Will it be by individual species? Will it by description?
  + Will individual trees have to be increment bored to determine age?
  + Cultural sites should and must be kept sovereign with unknown location. How does the agency address them during project implementation? What if they are large and within the Matrix.
  + How will the agency address the unknowns….I don’t believe the barred owl or extensive fires were even considered in the 1994 NWFP.
  + Other numerous questions?
* The BLM in their 2016 Resource Management Plan has already tried to tackle some of these challenges in identifying and reserving individual older trees so I recommend that Team and FACA group consult with how the BLM addressed similar challenges in their 2016 RMP.
* The implementation challenges will likely be played out on many field or district offices during the NEPA planning phase of the project with interest groups. Various eyes, minds and hearts will see and interpret various stand conditions and direction. Very clear guidance will be needed both at the individual tree level and stand delineation level. Even with clear guidance, I foresee that considerable effort will be required to reach consensus and avoid controversy and subsequent litigation during on-the-ground implementation. Whatever the final guidance for MOG and NWFP Amendments, the Team(s) needs to provide sufficient clarity to avoid some of the constant litigation experienced under the Northwest Forest Plan during it 25+ year history. One only needs to review the history of the Northwest Forest Plan litigation. Even within the Matrix land use allocation where sustainable timber harvesting was analyzed and projected, the BLM and USFS were continually litigated over proposed harvest treatments anticipated and authorized under the Northwest Forest Plan but often did not occur.

* **NWFP Summary - Forest Management Treatment Data**

Will the FACA group and USFS Team review the NWFP actual treatments: commercial timber harvesting; silvicultural prescriptions; cutting methods; fuel reduction; site preparation methods that the US Forest Service and BLM have been implementing for the past 25+ years under the Northwest Forest Plan and recommend modified silvicultural prescriptions acceptable to all interests that have resulted in forest ecosystem restoration? Within the 1994 Northwest Forest Plan and subsequent BLM Resource Management Plans (1995, 2008, 2012, 2016), there were guidelines for retaining MOG trees including within the Matrix/Sustainable harvest land allocation.

Since 1994, The Northwest Forest Plan, BLM Resource Management Plans, The Healthy Forest Management Act, various lawsuits, USFS Eastside diameter limit (21+” rule) and other direction has clearly changed the focus and silvicultural prescriptions across much of the western US and in the NWFP region on how the two agencies proceed with commercial timber harvests and the focus of the harvest treatment. Yet, during the latest January 30th and 31st FACA discussions, the changing guidance in silvicultural prescriptions was not often discussed. I believe an a summary of implemented treatment prescriptions under the NWFP would demonstrate the USFS commitment toward benefitting forest ecosystems and not just timber extraction intentions.

Would a following summary table help the FACA group with their recommendations:

* The total number of acres harvested in the NWFP region by agencies since 1995(?) showing the various cutting methods or silvicultural prescriptions used. For example, was the harvest a: clearcut, overstory removal, shelterwood, selective harvest, thinning, understory thinning, etc… This data could validate that the predominant cutting method the agencies have been implementing since the 1990’s (past 30 years) has been selective harvesting/forest resiliency treatments where the majority of the NWFP region and the retention of MOG trees.
* To validate the above paragraph, a data review of the USFS FIA plots pre and post timber harvest from 1995 to present could confirm that the actual harvest treatment resulted in retention of many or most of the MOG trees in the plots. In other words, the FIA plots could validate that the USFS & BLM has in fact been retaining the majority of MOG trees before and after harvest. This would be a factual and objective point to consider during the FACA review.

Thank You

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