



*Dedicated to the protection and restoration of the Umpqua watershed and beyond through education, training, advocacy and ecologically sound stewardship.*

TO: PNW Regional Forester, U.S. Forest Service, Portland

VIA: <https://cara.fs2c.usda.gov/Public//CommentInput?Project=64745>

DATE: January 31, 2024

RE: Northwest Forest Plan Amendment – scoping comments

From: Umpqua Watersheds. PO Box 101, Roseburg, OR 97470

Dear Forest Service:

Thank you for the opportunity to comment on the current process of the potential Northwest Forest Plan Amendment.

### **A Historic and Conservation Strategy**

Umpqua Watersheds encourages all federal agencies to strengthen old-growth and mature forest protections. The original Northwest Forest Plan (NWFP) was based on an in-depth analysis by countless federal, state, and private individuals and organizations (FEMAT, 1993). This in-depth work represents thousands of hours of thoughtful collaboration with scientists and other stakeholders to reach a comprehensive plan. It is important to respect and honor their commitment and contributions.

### **Benefits of the Strategy**

The Northwest Forest Plan slowed the degradation and elimination of vital habitats for the spotted owl and other old forest species. It did what it was expected to do by eliminating the liquidation of this ecosystem. After a lag period following the cessation of old forest logging, the plan stabilized the spotted owl population (Dugger et al. 2015). Other species benefited from this action as well.

### **Improving Forest Management**

There are opportunities to improve the NWFP by incorporating current information on wildfires, climate change, and tribal involvement. Still, other forest management plans or laws could be updated to address contemporary issues. Instead of focusing on revisions of a successful management document such as the NWFP, the federal government should focus on repealing or significantly revising the Oregon and California Railroad Act (O&C Act), an antiquated document dating to 1937 when legislatures had no concept of rapid depletion of the forests making up the ecosystems (43 U.S. Code § 2601). At the time of the O&C Act, the road system was limited, the chainsaw was barely in existence and not available for portable use, the fish were abundant, the health of the climate was not dire, and the Endangered Species Act and Clean Water act didn't exist. The O&C Act has undermined much of the federal government's effort to undo the massive harm done to the environment by industrial logging. It hamstring the managers who would normally work for U.S. citizens instead of facilitating the liquidation of public resources for a few private logging corporations.

### **Widespread Acceptance and Reliance on the Strategy**

The Northwest Forest Plan is a strategy that recognizes the importance of older forests. It has become a strategy that other state, federal, and private organizations have expected to persist into the future, which the other entities have incorporated into their long-term management plans. Most recently, the



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U.S. Fish and Wildlife Service's Draft Environmental Impact Statement for the Barred Owl Removal Strategy has incorporated the Northwest Forest Plan reserve system into its long-term management strategy (USFWS, 2023). Other state and federal management actions, as well as private operations, rely on and expect that the federal government will continue to protect reserve areas related to Threatened and Endangered species, including the USFWS Spotted Owl Recovery Plan, The Elliott Forest Management Plan, and the Oregon Habitat Conservation Plan for state lands. Private landowners are often relieved of responsibility for protecting T&E species because of the designations under the NWFP. Management plans such as Safe Harbor Agreements, Habitat Conservation Plans, and plans resulting from the Healthy Forest Reserve program agreements include language referencing the Northwest Forest Plan as a reason that secure habitat for imperiled species is permanently protected and that these additional agreements are sound in the protection measures that they outline for the species.

### **Preserving Old Forest**

The reserves in the NWFP include many younger stands that were expected to continue to transition to old forest conditions. There needs to be more time so many of those younger stands can develop old forest conditions. Many older forests are at risk from adjoining lands in much younger forest conditions. Typically, fires are more intense in younger stands. When these stands are adjacent to older forests, the risk to the older forest is much higher than those adjacent to mature and closed canopy stands. Since the inception of the NWFP, more research (Perry & Jones 2017, Law et al. 2022, Buotte et al. 2020) has indicated the importance of old forest ecosystems to our water supply and fire resilience, as well as mitigation toward climate change.

### **Fire and Fuels**

Fuels reduction should be concentrated near communities and forest dwellings. Low to moderate-intensity fires can and should be a part of the mitigation against large catastrophic fires. Treating younger stands and avoiding excessive fuel accumulation when the canopy is open is more important. These accumulated fuels dry more readily and increase the risk of higher-intensity fires as the sunlight reaches the forest floor and dries the accumulated fuels. It is a misconception that spotted owls do not utilize young stands because the density of trees makes it difficult for the owl to navigate. Thinning in dense forest plantations to add diversity and grow late-successional habitat can have the opposite effect if thinning is too heavy. A 40% canopy closure may negatively affect the rodent population, affect the utility of the forest for spotted owl dispersal, and degrade the conditions such that the owls are at risk from predators that can more easily see them. Thinning less aggressively and leaving unthinned skips embedded within treatment areas would help mitigate the risks.

Suitable spotted owl habitat must be protected from fuel reduction because the adverse trade-offs far outweigh the marginal benefits. Thinning heavily and too close to older habitats has the impact of fragmentation on these stands by creating an edge effect. These actions decrease the interior size of the habitat patch. Existing research finds that fuel reduction in westside forests is unlikely to mitigate fire effects in wind-driven fires. In addition, regrowth of the vegetation in these moist open canopy environments is usually quick and favors invasive species, contributing to fires. Smaller openings are more prudent in these landscapes to reduce the risk of high-intensity fires.

### **The Important Issues**



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Addressing the antiquated laws such as the 1872 Mining Act and the 1937 O&C Act should be a higher priority since these out-of-date laws have reduced protections on the Forest Service and Bureau of Land Management (BLM) lands in western Oregon. The withdrawal of BLM from much of the NWFP provisions for old-growth protections necessitates shifting that responsibility more heavily to the Forest Service. We saw that in the years of the COVID-19 pandemic, recreational opportunities were critical for the nation's mental health. These forests are not just timber producers but are important to the health and livability of the communities and visitors seeking solitude and healthy activities.

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Umpqua Watersheds Conservation Committee

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