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In Response to: Federal Register Docket Number 2023-27742: *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*

Dear Ms. Buchanan and Ms. Eberlien,

Introduction

Associated Oregon Loggers (AOL) is a local trade association representing nearly 1000 family-owned forest contracting businesses. Our members have been involved in the management of federal lands for generations. Our members are essential to conduct any activity in the woods, be that road work for access, timber falling for management and restoration, reforestation for sustainability, trucking for product transportation, and many other services. AOL's members provide a diverse array of services that are necessary for National Forests to conduct all of their forest management activities in order to achieve the goals and objectives of the Northwest Forest Plan.

AOL's members actively engage in the mitigation efforts outline and pursued in the Forest Service's 10-Year Wildfire Crisis Strategy, the suppression efforts during active fire operations and the restoration efforts following disturbance events. They are always able and willing to help with these activities because forest management and restoration is their passion.

Overview

The original intentions behind the Northwest Forest Plan were undoubtedly noble, aimed at species protection while meeting various societal needs. However, the passage of time has revealed a critical truth: many of the allowable actions within the plan have been stifled, not by a lack of merit, but by prevailing opinions and sentiments rather than grounded scientific evidence. This divergence from a science-based approach has led to unintended negative externalities, impacting both the health of our forests and the stability of our communities.

The challenges we face today are multifaceted. Climate change and wildfire have changed the way we need to think about forest resiliency. National forests are dynamic entities, not static relics bound by the lines of a map. The interconnectedness of ecosystem services, community stability, and habitat maintenance necessitates a nuanced approach to forest management, one that is grounded in scientific evidence and adaptive to the changing needs of both the environment and the communities it supports.

Active management strategies, including all silvicultural tools (both non-commercial and commercial), are essential for maintaining forest health, enhancing biodiversity, reducing the risk of catastrophic wildfires and supporting communities. These practices not only contribute to the resilience of forest ecosystems but can also optimize the net carbon sequestration potential from National forests, an increasingly critical function in the face of climate change.

Incorporating the latest scientific findings on climate change, wildfire behavior, and ecosystem dynamics will be crucial. The plan must be flexible, allowing for adaptive management strategies that can respond to unforeseen challenges and opportunities.

Furthermore, the role of small forest contractors and the forest sector workforce is paramount in achieving these management goals. Their expertise, innovation, and dedication to sustainable practices are invaluable assets in collective efforts to steward National forests.

In light of these considerations, we advocate for an amendment of the Northwest Forest Plan that integrates active management across all forest landscapes, emphasizes the importance of a diverse age structure in forest stands for optimal ecosystem function, and recognizes the critical contributions of forest contractors and workers. Such an approach will not only safeguard the ecological integrity of public lands but also ensure the long-term sustainability of the communities that depend on them.

By embracing these principles, the amendment can serve as a model for sustainable forest management, balancing conservation objectives with the needs of local economies and the well-being of all community members, including those who have stewarded these lands for generations.

Recognizing the Sustained Yield Provisions for the Forest Service

The Multiple Use-Sustained Yield Act (MUSYA) sets forth a framework that emphasizes the requirement for the Forest Service land base to achieve multiple objectives. As you deliberate on the amendment to the Northwest Forest Plan, it is imperative that we uphold these principles, ensuring that forest management practices do not disproportionately favor one use over others, but rather promote a harmonious integration of all uses for the sustained health and productivity of forest ecosystems.

The sustained yield provisions of MUSYA are particularly critical as they mandate that forest resources be managed in a manner that achieves a high level of resource outputs without impairing the productivity of the land. This principle is essential for ensuring the long-term health and viability of forest ecosystems and the services they provide.

While ecological sustainability is at the heart of the sustained yield provisions, economic viability also plays a crucial role in sustainable forest management. Economic analyses and market-based instruments can be used to support sustainable practices, invest in restoration and conservation efforts, and provide incentives for the stewardship of forest resources. Ensuring that forest management is economically viable helps to sustain local communities and industries that depend on forest resources, aligning economic and ecological objectives.

Of note, MUSYA does not require that every acre is managed for all uses. Having areas specifically dedicated to sustained yield timber production can and should exist alongside areas dedicated to other uses. The Matrix land base can simply have this production goal as its primary objective while at the same time achieving many other objectives as outlined in MUSYA.

Forests provide a plethora of social, biologic and economic benefits to communities in and around them. It is the professional forests and operators in Oregon who steward these lands and ensure these benefits remain balanced and our future generations get to experience their beauty in the same way we do today.

Oregon's forests also are among the best in the nation at sequestering carbon. Wood is produced by trees in a forest, using free energy from the sun, carbon dioxide from the air, plus water and nutrients from the soil. Wood is beautiful, strong, natural, renewable, recyclable, energy efficient and easy-to-use. No other resource on earth can match its environmental advantages.

Clearly, the world should be using more wood, not less, to address our societal needs around climate change, homelessness, wildfire risk and economic vitality and by using more wood, building with mass timber, developing more low-income housing with these products, converting from petroleum to renewable fuels and much more, we have a win-win on our hands.

Working forests ensure that we have sustainable and vibrant communities throughout Oregon and can help us achieve carbon neutrality when we allow them and we allow the people working in them to thrive.

In the face of challenges such as climate change, invasive species, and altered fire regimes, managing forests for resilience and resistance becomes imperative to maintain sustained yields. Overall, the sustained yield provisions must be considered in the context of climate change, which poses significant threats to the productivity and health of forest ecosystems. Strategies to mitigate climate change impacts and adapt management practices are essential for ensuring the long-term sustainability of forest resources.

The sustained yield of forest resources is best achieved through landscape-scale conservation and management approaches that transcend individual forest stands or management units. This broader perspective allows for the consideration of ecological processes that operate at larger scales, such as wildlife migration, watershed hydrology, and regional climate patterns, ensuring that management practices contribute to the overall health and resilience of larger landscapes.

Balancing Forest Resiliency and Habitat Needs

The amendment of the Northwest Forest Plan presents a unique opportunity to reassess and refine FS management strategies to ensure the resilience of forest ecosystems. It is paramount that we adopt a holistic approach that not only prioritizes forest health and biodiversity but also considers the socio-economic fabric of the surrounding communities. A balanced management strategy should integrate adaptive measures to enhance forest resilience against climate change and wildfire risks, while also safeguarding critical habitats for wildlife.

The critical task of balancing forest resiliency with habitat needs within the Northwest Forest Plan amendment process calls for a nuanced, multifaceted approach that acknowledges the intrinsic value and interdependence of diverse forest ecosystems. This balance is not merely a matter of conserving scenic landscapes; it is essential for maintaining the ecological functions that support biodiversity, climate stability, and human well-being.

Restoration efforts in disturbed or degraded areas are critical for enhancing forest resiliency and habitat quality. Activities such as reforestation, invasive species management, and the restoration of natural fire regimes can help to rebuild ecological integrity and resilience. Restoration projects should be designed with a long-term perspective, aiming to reestablish healthy, functioning ecosystems that can sustain diverse flora and fauna.

Balancing forest resiliency and habitat needs also involves sustainable harvesting and resource use practices that maintain the ecological functions across the forested landscape while providing for human needs.

Regrettably, the threats to old growth, mature stands, and the species that depend on them are drought, excessive heat, and the ever-encroaching possibility of stand replacing wildfire. These should be the primary issues addressed through the Northwest Forest Plan Amendment. The Forest Service must contemplate how to adjust the agencies tolerance for risk to ensure all scientifically appropriate management activities can occur across the forested landscapes within the panning area to first and foremost enhance resiliency.

There is an opportunity, through thoughtful forest management, to enhance resilience over time—an approach firmly rooted in climate-smart forestry, outlined in the National Wildland Fire Mitigation and Management Commission Report along with the 10-Year wildfire crisis strategy. AOL implores you to use these strategies and plans to inform your decision making.

Addressing Climate Change

Incorporating climate-smart conservation strategies into forest management is vital for addressing the challenges posed by a changing climate. This approach involves managing forests in ways that reduce their vulnerability to climate-related stressors while maximizing their potential to mitigate climate change through net carbon sequestration. However, forests are dynamic, ever-evolving systems. Traditional management practices, guided by static and sometimes arbitrary delineations, fall short in addressing the complexities of forest ecosystems. The amendment process must recognize the fluidity of natural systems and the necessity for management practices that are flexible, adaptive, and grounded in the latest scientific research.

When net carbon sequestration is considered, the biogenic emission for fires become ever more critical to consider and the more permanent store of carbon in the built environment must be recognized as a climate smart practice across the west.

Leaving forests alone may seem beneficial to optimize carbon storage, but new research suggests sustainably managing and harvesting forests substantially improves carbon mitigation outcomes. The best

uses of wood provide a "carbon negative technology" with the ability to displace fossil emissions. In short, simply planting more trees, then walking away is not enough. We must also harvest and use the wood to optimize the climate change benefits.

In this day and age the value of maximizing carbon benefits should be prioritized through sustainable management rather than antiquated reserve systems (wilderness, late-successional reserves, etc.). To get net negative carbon outputs from forests, trees **must** be harvested.

From a carbon perspective, private timberlands (big and small) are doing their part, harvesting approximately 77% of total growth each year to provide wood products and carbon substitution benefits. Where we fall short is on federal lands. Only about 8% of annual growth is harvested on Oregon's federal lands, leaving dense unhealthy forests accumulating more fuel for wildfires every year.

With wildfires unlikely to slow, forest management is needed more than ever. Wildfires turn forests into huge carbon emitters. According to the Up in Smoke Report by Jerrett et. al. in 2022, California's wildfire carbon dioxide equivalent (CO2e) emissions from 2020 are approximately two times higher than California's total greenhouse gas (GHG) emission reductions since 2003. Wildfire emissions in 2020 were 127 mmt CO2, seven times the 2003–2019 mean and wildfires in 2020 negated reductions in greenhouse gas emissions from other sectors.

The urgency of climate change and the increasing prevalence of wildfires necessitate a forward-thinking approach in the amendment of the Northwest Forest Plan. Strategies must be developed and implemented to mitigate these risks, enhancing the adaptive capacity of forests. This includes, but is not limited to, proactive fuel management, restoration of fire-adapted ecosystems, and the integration of climate-smart conservation strategies to bolster the resilience of forests and surrounding communities. The increasing frequency and intensity of wildfires, exacerbated by climate change, underscore the need for strategic management practices aimed at reducing wildfire risks and enhancing forest resilience.

This fundamental characteristic of forests demands a management approach that is equally dynamic, one that respects and mirrors the natural processes that drive forest development and succession. To truly acknowledge the dynamic nature of forests, management practices must aim to promote ecological complexity and resilience. This involves conserving a variety of forest types and structures, from dense canopies to open woodlands, and from young regenerating stands to ancient old-growth forests. Such diversity ensures that forests can support a wide range of species and ecological functions, enhancing their ability to withstand and recover from disturbances.

Successional diversity, or the presence of forest stands at different stages of development, is crucial for maintaining biodiversity and ecosystem service, thus all stages of development should be recognized for the services they provide rather than overemphasizing mature and old stands. This approach has not led to a more resilient forest land base since the inception of the Northwest Forest Plan and has not led to the recovery of the Northern Spotted Owl.

Emphasizing Scientific Integrity and Data-Driven Decisions

The cornerstone of effective and sustainable forest management is the unwavering commitment to scientific integrity and the utilization of data-driven decisions. As we embark on amending the Northwest Forest Plan, it is imperative that these principles guide your path forward, ensuring that your strategies are not only grounded in the best available science but also adaptable to new insights and discoveries.

The field of forest science is continually evolving, with new research findings and technological advancements offering innovative solutions to management challenges. The amendment process should be receptive to integrating the latest scientific discoveries and leveraging cutting-edge technologies, such as remote sensing, GIS mapping, and ecological modelling, to enhance FS understanding and management of forest landscapes.

Forthcoming research from the PNW Research Station, has provided preliminary results demonstrating that we can prioritize wildfire resiliency treatments over the long-term in Late Successional Reserves without compromising the integrity of our old growth and mature structure indices. The methods and models used in this research underpin its objectivity and scientific integrity is bolstered by transparency and reproducibility in research. Data, methodologies, and findings from the PNW Research Station are openly available to the scientific community, policymakers, and the public, allowing for independent verification. This transparency fosters trust in the scientific process and ensures that management decisions are based on verifiable evidence. However, the amendment does not seem to be driven by the large libraries of research and analysis by the Forest Service Research Stations. AOL would like to see these expert perspectives used to synthesize the body of research available to inform the amendments sought for the Northwest Forest Plan. This data should serve as the backbone for decision making for the Forest Service.

While scientific research forms the backbone of data-driven decisions, the knowledge and perspectives of local stakeholders, including professional foresters, mills, loggers and other natural resource professionals, are invaluable. Engaging stakeholders like AOL and our members in the research process allows for the co-production of knowledge, ensuring that scientific findings are relevant to local contexts and management needs. This collaborative approach enhances the applicability and effectiveness of management strategies.

Building the capacity of forest managers, policymakers, and practitioners to understand and apply scientific findings through this co-production of knowledge is crucial for the successful implementation of data-driven decisions. Training programs, workshops, and knowledge exchange platforms can facilitate continuous learning and ensure that the workforce is equipped with the latest scientific knowledge and management tools.

Public-private partnerships can mobilize resources, expertise, and investment from both the public sector and private industry, driving innovation and sustainable development within forested regions. Encouraging such collaborations can lead to mutually beneficial outcomes that support both economic development and forest conservation.

Strengthening Community Engagement and Economic Stability

The successful amendment of the Northwest Forest Plan hinges not only on ecological and scientific considerations but equally on the engagement of communities and the enhancement of economic stability

within forested regions. The forest sector, including loggers, forest contractors, and other stakeholders, plays a pivotal role in the stewardship of FS forests. These individuals and entities bring invaluable knowledge, experience, and a deep connection to the land. The amendment process should include mechanisms for meaningful engagement with these stakeholders, recognizing their contributions to forest management and the local economy. The intertwined nature of human and forest ecosystems necessitates a collaborative approach that recognizes and harnesses the potential of community involvement in forest management.

Forests are a source of livelihood for millions of people worldwide. Management strategies should aim to support and enhance these livelihoods through forest management that balances ecological conservation with economic activities. This includes promoting sustainable timber harvesting, restoration activities, and other forest-based enterprises that can provide economic benefits while maintaining forest health and biodiversity for the long-term.

The forest sector workforce is a critical component of forest management and conservation. Strengthening this workforce involves training and capacity building initiatives that equip individuals with the skills and knowledge needed for sustainable forest management practices. Additionally, understanding the current capacity and demographics of the forest sector workforce, as well as future needs in light of evolving priorities such as wildfire mitigation and climate change adaptation, is essential for strategic workforce development. However, it is important to note that efforts like this are outside of the scope of the amendment. The Forest Service should work with AOL to further support workforce development operationally, but the biggest way the amendment can solidify this effort is through increased work opportunities, flexibility for operators to use new and innovative tools and equipment, certainty of harvest operations that are both economically viable and operationally feasible, commitments to treatment acres and volume outputs. Without these types of certainties, any outside workforce development efforts will be meaningless.

The economic stability of forested regions is closely linked to the availability of infrastructure and services. Improving access to education, healthcare, transportation, and communication networks can enhance the quality of life for rural populations and support sustainable development.

Conclusion

As you move forward, it is important to remember that forests are a legacy, a trust requiring maintenance and active management in order to pass it on to future generations. By grounding these critical decisions in science, embracing innovation, and acknowledging the deep interconnections between forest, habitat and community stability, the Forest Service can ensure that this legacy endures, flourishing for centuries to come.

Integral to this vision of forest stewardship as a legacy are small forest contractors—the loggers, road builders, and conservation-minded operators—who stand as the unsung heroes in this narrative. These community members, deeply connected to the land, embody a level of understanding and respect for the forests that is unparalleled. Their daily engagement with these ecosystems fosters a profound intimacy, akin to that of our local tribes, born from a life dedicated to the stewardship of nature.

Thank you for the opportunity to provide written comment on the Notice of Intent to Amend the Northwest Forest Plan for our members who depend on a sustainable and predictable supply of timber across Oregon.

Sincerely,

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