

assessment or validation of the true cost to this change in management direction of public lands. Furthermore, the team should also consider if and how a local community should be given deference in public comments to areas that directly affect their community members and economy.

- Traditional ecological knowledge. Update the plan to include tribal involvement in all phases of the planning process, especially in proposed action development, implementation, and monitoring.
- Changed fire environment in NW Oregon. I recommend the team pay attention to the changes seen in the last 10 years in wildfire size, effects, and changes in post-fire forest conditions. Also, a robust discussion about changes in fire effects based on land management actions allowed in the current NWFP and reevaluating fuels projects and how to reestablish fire that was a natural part of a healthy forest in pre-European settlement. Prescribed fire projects need to be at a watershed scale.
- Pivot the NWFP away from single species management to that of more ecologically based management. The current plan is overly focused on NSO and Red Tree Vole managing at the cost of sound forest and fire ecology-based decision making. Delete the Survey and Manage program and replace it with Species of Conservation Concern to be in better alignment with contemporary natural resource logic.
- Base any updates on best available science, common sense, and professional experience; not the current political narrative that seems to drive most issues in today's world where facts are optional.

The original plan was based on years of rigorous, peer reviewed science and on the ground understanding/knowledge. The plan also includes years of key negotiations and tradeoffs that need to stay within the plan. Don't throw out the baby with the bathwater.

In closing, please stay focused on a few items you can make informed and educated topics you can improve, and do not be distracted by other topical areas that could be as important but not covered in this analysis. Leave that for a later day and a new team.



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RE: Updates to the Northwest Forest Plan

Federal Advisory Committee,

I understand your team is beginning the challenging task of providing administrative updates to the Northwest Forest Plan (NWFP) and that you are currently seeking scoping comments. Please take this letter as initial scoping comments. I am writing to share my thoughts and experiences of the NWFP. When written, this document was considered a preeminent conservation document for northwest forests, within the range of the Northern Spotted Owl (NSO). Over time, there have been minor edits and additions as well as significant amounts of case law resulting from decisions that were believed to not be consistent with its direction.

I am writing to the committee, informed by 35+ years of professional natural resource experience and 6 years of natural resource higher education. My background started as a professional forester and silviculturist and then as a fisheries biologist and land manager.

I was very happy that a federal advisory committee was established and formed to look at potential additions and updates to this aged document. There have been several attempts over the last 20 years to start this effort that lost steam and stopped before they even got going. When the team was identified and put forth by the Undersecretary of Agriculture, I was hopeful and encouraged this effort has legs.

As the team considers subject areas to update, I believe you need to be focused and limit your analysis to only a few topical areas or you will not be able to deliver a proposed action by the designated due date. I believe areas to invest for the team include:

- Riparian Reserves. The current plan is inflexible and has left the inner riparian area mostly off limits to any treatments. This has left unhealthy concentrations of vegetation and stagnation. With the climate change seen in the last 10 years in western forests, these areas are like 'wicks' on the landscape and have resulted in high severity burning in these areas and with non-desirable catastrophic effects.
- Forest health and resiliency. The current political spectrum has focused the management of these forests to subject areas other than sound forest health, resiliency, and ecology. I encourage you to NOT focus on ages of stands to treat or not treat, rather focus on stand structure (horizontal and vertical), function, departure from the RNV and location within the landscape.
- Land allocations and changing lines on the landscape. The initial NWFP established land allocations with static delineations that do not change. I ask the team to look at the possibility to move stated allocations based on stand function and condition in consideration of attainable future goals and objectives. As an example: there are many thousands of acres that have burned in the recent past that are in LSR allocations that have little to no resemblance to anything that is Late Seral or Old Growth. These stands are complex early seral. Managing them as LSR is illogical. Allowing allocations to move around also recognizes that forests are dynamic and their health and structure change over time.
- Real effects to local communities. The original NWFP did an excellent job framing up potential effects to local communities and businesses. Since that time there has been marginal real-world