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Re: Notice of Intent to Develop Northwest Forest Plan Amendment #64745

Please consider the following comments on the Forest Service's notice of intent to amend the Northwest Forest Plan (NWFP). Cascadia Wildlands is a 25-year-old, non-profit conservation organization that works to defend and restore Cascadia's wild ecosystems in the forests, in the courts, and in the streets. Cascadia Wildlands envisions vast old-growth forests, a stable climate, rivers full of wild salmon, wolves howling in the backcountry, and vibrant, diverse communities sustained by the unique landscapes of the Cascadia bioregion. Over 12,000 members and supporters across the country help sustain the organization and its movement for change. Our members, supporters, staff, and volunteers cherish the National Forests included in the NWFP management area for many reasons. We frequent the National Forests to retreat, forage for mushrooms, view wildlife, create art, hike, bike, float the rivers, and swim in the streams that flow through, and much more.

The preliminary need to change, as described in the Notice of Intent, focuses on five interrelated topic areas, including:

1. Improving fire resistance and resilience across the NWFP planning area.
2. Strengthening the capacity of NWFP ecosystems to adapt to the ongoing effects of climate change.
3. 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.
4. Incorporating Indigenous Knowledge into planning, project design, and implementation to achieve forest management goals and meet the agency's general trust responsibilities.
5. 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.

Our staff and volunteers spend much of our time getting out in the woods to field check the projects public land management agencies propose, compare on-the-ground conditions to what is described in National Environmental Policy Act (NEPA) planning documents, and providing informed feedback to the agency. Building on those experiences, we hope to see some especially problematic loopholes closed through the NWFP amendment process. We joined twenty other environmental conservation organizations in submitting a joint comment letter; we incorporate those comments by reference and ask the agency to also consider these supplemental comments.

Maintain and strengthen protections for mature and old-growth forests and trees.

In western Oregon, federally-managed public forests overlay the ranges of numerous species protected by the Endangered Species Act (“ESA”). Ecologically- and culturally-significant species such as the marbled murrelet, northern spotted owl, and several stocks of salmon and steelhead rely on mature and old-growth forests and trees for habitat and climate moderation. Dead snags and downed logs in mature and old-growth forests also provide important habitat for species and their prey, including insect foraging opportunities for birds like woodpeckers, while keeping carbon on the landscape. Maintaining mature and old-growth on public lands, and allowing forests to grow older and more complex, is essential to ensuring the recovery and survival of the mature and old-growth dependent species listed by the ESA.

Despite this, and following decades of aggressive logging practices that decimated these globally-significant forests, federal agencies (including the Forest Service) continue to cut down crucial mature and old-growth located on public lands, irreparably impairing climate mitigation and myriad other co-benefits. While the groundbreaking 1994 Pacific Northwest Forest Plan protected mature and old-growth forests and trees 80 years and older from logging, it left one million acres of late successional forests open to logging.

Take, for example, the Flat County Timber Project in the Willamette National Forest McKenzie District, pictured on the following page. Approved by the Forest Service in March 2022, the project would have aggressively logged 2,000 acres of older forests in the headwaters of the McKenzie River, which provides fresh drinking water to hundreds of thousands of residents in the Willamette Valley. The project threatened to clearcut about 1,000 acres of mature and old-growth Douglas fir and western hemlock stands up to 170 years old under the guise of improving stand conditions while supplying a sustainable supply of timber products.

While the project would have protected some “legacy” trees, cutting everything except the largest trees is still a harmful clearcut. Owls need the canopy cover, marbled murrelets need habitat buffers, and red tree voles need the connectivity. Isolated individual old-growth

trees no longer have protected microclimates that provide habitat for older forest dependent species and frequently blow down in the first storm following the removal of all surrounding trees that buffered the effects of weather for hundreds of years. This is not ecologically beneficial. We should be protecting areas that contain old structure to preserve their actual ecological function. We've also seen logging proposals that cut older trees and forests to punch roads through or locate landings, further fragmenting key habitat and reducing its function. We ask that these loopholes allowing mature and old-growth forests and trees to continue to be logged for commercial purposes be closed.



Exploring a timber sale unit in the proposed Flat Country timber sale in the headwaters of the McKenzie River. Photo by Andrew Kumler.

Following an outcry of opposition from the public and elected leaders to the lasting ecological damage this project would have caused, paired with conservation organizations urging the agency to consider significant new information that rendered environmental analyses inadequate and outdated (Executive Order 14072 and the 2020 Labor Day fires), the agency withdrew the project.

In discussions surrounding the Flat Country Project, the Forest Service emphasized the need to get wood flowing to the mills. This purpose needs close scrutiny given the climate and biodiversity crises; the economic benefits of conservation outweigh the economic benefits of logging, as well as the ongoing flow of wood to the mills from private lands.

Thinning projects focused on young, dense plantations help produce some wood for the mills without as many trade-offs compared to projects that log mature and old-growth forests or projects that involve regeneration harvest/clearcutting. However, even projects supposedly aimed at thinning younger stands have posed a threat to older forests due to overbroad project design, inadequate conditions modeling, or the agency's lack of checking on-the-ground conditions.



Admiring old-growth Douglas fir in a diverse, well-spaced unit of the Calloway Timber Project. Moist even in the dry season, this unit contained a plethora of native understory plants. Photo by Cascadia Wildlands.

One timely example is the Calloway Timber Project, shown above and below, which was also proposed by the Willamette National Forest McKenzie District. As described by the agency, this massive project involves ~8,000 acres of thinning in young managed stands in the Blue River watershed for the purposes of timber production, stand management, fuels work, riparian restoration, and road management. Yet when field checking many of the units proposed for thinning treatments, our volunteers came across diverse, well-spaced, older forests lumped into the watershed-wide project area.



Volunteers in a stand in the Calloway Timber Project that contains both old-growth and mature trees with predominantly Douglas firs and western hemlocks plus pacific yews, incense cedar, red alder, and dogwood trees. With trees over 250 years old, this forest stand contains distinct layers and biodiversity and would not benefit from any type of logging. Photo by Cascadia Wildlands.

Far too often restoration efforts are combined with large-scale commercial logging projects, which amounts to one step forward and two steps backward because mature forests are converted into dense timber plantations in need of future restoration. While we support limited restoration activities or necessary hazard maintenance that might involve tree felling or removal within older forests, the Forest Service should ensure responsible management in these areas by prohibiting commercial logging and strive to fall and leave carbon-dense trees on the landscape as carbon stores and wildlife habitat.

All mature and old-growth trees and forest—in both moist and seasonally dry forests, in and out of the matrix—should be protected from logging. If any logging in mature and old-growth forests is allowed to occur in certain circumstances, it must be evaluated and justified by the agency through a thorough, transparent, and science-based review process. Treated plantations in late-successional reserves should continue to be managed to progress toward old forest characteristics. Plantations should be better stewarded as well, with greater diversity in both species and spacing, timely management of slash piles, and road system minimization. The NWFP amendments must bolster efforts to recover imperiled fish and wildlife, recognizing the ongoing threat of climate change and past management practices.

Incorporate Indigenous knowledge and land management practices.

We ask the administration to prioritize meaningful involvement of Tribal Nations and communities as the amendments are developed and throughout all phases of NWFP implementation, in effort to right one of the most alarming wrongs of the NWFP's original development. The current NWFP amendment process is unfolding at a very fast pace and Tribal members and representatives have expressed grave concern and frustration that Tribes will not have adequate time or resources to review and provide input to the proposed amendments.

As a steward of ancestral homelands that were stolen from Indigenous peoples, the Forest Service must seek out and incorporate Indigenous knowledge in all phases of forest management. Indigenous peoples have lived in relationship with the land since time immemorial and Indigenous knowledge must be considered in conjunction with western science as high-quality information. The agency must ensure Indigenous peoples are empowered with the information and access needed to rebuild relationships and restore traditional practices (e.g., ceremonial practices, foraging for First Foods, cultural burning) to those lands. Indigenous knowledge-holders should be centered, meaningfully involved, and compensated for their input and guidance throughout land management planning and implementation. The agency should provide opportunities for co-management and stewardship agreements, as well as work to restore Indigenous-led cultural burning and other culturally-significant practices.

The Affiliated Tribes of Northwest Indians have called on the Biden Administration to protect federally-managed mature and old-growth forests from logging. A portion of [Resolution #2022-36](#) reads:

THEREFORE BE IT RESOLVED, that ATNI requests that the United States Department of Agriculture and the United States Department of the Interior urgently initiate a rulemaking process to protect the remaining mature and old-growth forests and trees

on ancestral lands managed by USFS and BLM from logging, subject to limited exceptions—such as exceptions to the extent necessary for fire risk reduction and ecological restoration—that prioritize retaining the trunks of felled large trees in the forest for their stored carbon and habitat values wherever possible; and

BE IT FURTHER RESOLVED, that ATNI requests that the Departments require USFS and BLM to develop management strategies, in partnership with Tribes, to grow younger forests into old-growth with site-appropriate species composition; and

BE IT FURTHER RESOLVED, that ATNI requests that the Departments prioritize the meaningful engagement and government-to-government consultation with Tribes from across the country in such a rulemaking process and provide the support necessary to Tribes for such participation; and

BE IT FINALLY RESOLVED, that any regulation that results from such a rulemaking process, not infringe on Tribal Treaty rights, respects traditional and customary uses, incorporates Indigenous Traditional Ecological Knowledge, and continues meaningful, supported collaboration with Tribes in an inclusive land management process integrated with Tribal traditional land and forest management practices.

We ask that the agency meet the requests outlined in the resolution.

Logging increases fire risk and hazard.

While thinning operations are often proposed under the guise of reducing fire risk, they result in far higher carbon emissions than wildfires.¹ Thinning for alleged fire risk reduction is negatively impacting imperiled species like the northern spotted owl as well.²

The Forest Service should move away from aggressive fire suppression, as it is ineffective at reducing wildfire risk, increasingly costly, and poses unnecessary safety risks. A better approach toward achieving adaptive resilience to wildfire involves

1. recognizing that fuels reduction cannot alter regional wildfire trends;
2. targeting fuels reduction to increase adaptation by some ecosystems and residential communities to more frequent fire;
3. actively managing more wild and prescribed fires with a range of severities; and

¹ Bartowitz K.J. et al., Forest Carbon Emission Sources Are Not Equal: Putting Fire, Harvest, and Fossil Fuel Emissions in Context, *Front. For. Glob. Change*, 2022, <https://doi.org/10.3389/ffgc.2022.867112>.

² Bond M.L., Chi T.Y., Bradley C.M., DellaSala D.A. Forest Management, Barred Owls, and Wildfire in Northern Spotted Owl Territories. *Forests*. 2022; 13(10):1730. <https://doi.org/10.3390/f13101730> (“[T]he main treatment type on National Forest lands to lower fire intensity in NSO sites may actually be causing more habitat degradation than severe wildfires, especially when results of NSO site occupancy are conflicted by pre- and post-fire logging.”).

4. incentivizing and planning residential development to withstand inevitable wildfire.³

The dry forests east and south of the Cascade Mountains suffer from decades of fire suppression *and* over-harvest. Further, the moist/dry boundary line is not so easily determined (e.g., pockets of dry forests exist in the Middle Fork District of the Willamette National Forest west of the Cascades), and conditions are continually shifting due to climate change. Forest management in dry forests should consider the need to reverse decades of fire exclusion by prioritizing non-commercial, small-diameter fuel treatments and managed use of fire, as well as protecting fire resistant mature and old-growth trees. This will ensure carbon storage is not lost and that ecological processes like fire are restored to these forests.

No post-fire or “salvage” logging should take place. Post-fire actions should focus only on removing hazard trees along main travel routes, campgrounds, and other frequently used recreation sites, allowing for a reasonable amount of risk in a sensitive post-fire landscape. Post-fire hazard tree removal should never take place of unfrequented spur roads.

Please also consider the following environmental and community impacts stemming from logging and road building.

- **Soil health**: Logging, roads, heavy equipment, and burn piles interrupt soil building processes, degrade soil functions, and increase soil erosion. These activities kill native vegetation that normally share carbohydrates and feed a vast below-ground ecosystem. Soil compaction and disturbance reduces the flow of air and water vital to the below ground ecosystem. Brush piles are often left behind for years due to limited agency capacity and poor implementation, only increasing fire risks on the landscape as a result of projects that claim to mitigate fire risks.
- **Invasives**: Logging and roads spread weeds by exposing mineral soil, transporting seeds, and removing native vegetation, thus giving more light and nutrients to weeds. Inventories show that weeds are closely associated with roads and recently logged areas. Prioritize native plant health and abundance.
- **Water quality and quantity**: Logging and roads degrade water quality and fish habitat, including increased stream temperature and increase sediment and turbidity. Logging and roads reduce stream shade and stream flow, both leading to an increase in stream temperature that degrades aquatic habitat. Erosion and sediment from logging and roads also adversely affect stream morphology and fish habitat. Water quality

³ Schoennagel, L., et. al. Adapt to more wildfire in western North American forests as climate changes. Proceedings of the National Academy of Sciences, vol. 114, No. 18, 4582-4590, <https://doi.org/10.1073/pnas.1617464114>.

degradation impacts nearby rural residents and downstream communities who draw their drinking water from forested watersheds.

- **Snags and dead wood:** The agency should prioritize snag habitat conservation and dead wood recruitment. One of the most significant and lasting effects of stand replacing disturbance, including regeneration logging, is to bring the process of snag recruitment to a virtual standstill for many decades. Especially when trees are removed by logging, the snag population is directly reduced to ensure safe conditions for workers and remains low for many decades because the pool of green trees available for snag recruitment is greatly reduced. This results in a multi-decade “snag gap” that has serious adverse consequences for habitat and many other ecological processes. Artificial snag creation is not an adequate replacement for natural processes and ecological function.

Consider cumulative impacts.

Cumulative impacts from forest management on private and Bureau of Land Management (BLM) lands must be considered in the development and analysis of the proposed amendments, including BLM lands governed by the Oregon & California Lands Act. Federally-managed public forest land in Oregon needs to buffer industrial logging practices on private lands that have increased the risks within our communities to extreme fire behavior, polluted drinking watersheds, and released significant amounts of carbon into the atmosphere. National Forests act as important buffers to private timber plantations.

Create enforceable standards.

We ask that amendments focus on creating enforceable standards to ensure the protection of large trees and mature forest function, water quality and quantity, and habitat corridors for wildlife. In our experience, each district is unique with its own management styles and challenges. Habitat protection standards must be clear and enforceable to ensure they are straightforward, can be easily implemented across the board, and will endure inevitable administration, leadership, and staff changes.

Consider community benefits related to intact forests.

The economic benefits of conserving mature forests far outweigh the economic benefits of logging, as well as the ongoing flow of wood to mills from private lands. Logging and roads degrade the quality of recreation opportunities on public lands. People who recreate on public lands tend to seek a recreation setting that is dominated by natural features and natural processes, not logging, weeds, stumps, eroded soils, degraded streams, etc. The economic value of intact forests should not be underestimated. The Forest Service should account for the costs of logging (degraded ecosystems, loss of ecosystem services,

contribution to climate change, etc.) as well as the economic benefits from *not* logging (recreational opportunities, tourism, scientific research, photography businesses, etc.) when proposing timber sales on public lands. Please consider the full range of economic benefits of leaving forests intact, including non-consumptive uses like hiking, foraging, fishing and guiding, camping, photography, personal enjoyment and restoration, river rafting, and more. Protect those uses by discontinuing commercial logging in mature and old-growth forests and instead focusing on creating job opportunities for communities through restoration management and recreation.

Conclusion

Thank you for considering these comments as you develop the NWFP amendments. We offer our sincere gratitude to the Federal Advisory Committee members and agency staff working to modernize the NWFP. With the weight of the compounding climate and biodiversity loss crises looming over us all, we thank you for using your collective expertise and diversity of experiences to help positively impact the future of northwest forests.

Sincerely,



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