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Dear Regional Foresters Jacqueline Buchanan and Jennifer Eberlien,

Please accept this comment as part of the scoping period for the proposed Northwest Forest Plan amendments.

Bark’s work is focused on the ancestral homelands and ceded territories of the many tribes and bands that today are members of the Confederated Tribes of Grand Ronde, Confederated Tribes of Warm Springs, and Confederated Tribes of Siletz Indians. 1.1 million acres of these lands are known today as Mt. Hood National Forest - a landscape within the scope of the Northwest Forest Plan.

Bark’s mission is to transform the lands now known as Mt. Hood National Forest into a place where natural processes prevail, wildlife thrives, and local communities have a social, cultural, and economic investment in its restoration and preservation. Bark’s supporters live in the many communities whose social and economic identities are tied to the mountain and surrounding forest. We submit these comments on behalf of our supporters.

**Fire Resistance and Resilience**

Decades of mismanagement by Federal agencies has dramatically altered the landscape and reduced the forests’ resiliency to natural processes like wildfire, drought, insects, and disease. We appreciate the recognition in the NOI that “…more than a century of fire exclusion and other management practices have resulted in overly dense and homogenous forest conditions that heightens the risk of large, high-severity fires.” However, in addition to fire exclusion, logging of the largest, most fire-resistant trees, even-aged silvicultural management practices, grazing, and road building have contributed significantly to the current patterns, frequencies, and severity of wildfires, insect and disease outbreaks, and other natural disturbances. Glossing over these impacts as “other management practices” does not adequately identify current stressors to forest ecosystems and will hamper the Agency’s attempts to address these stressors during project planning.

To be clear, this isn’t simply a vain attempt at reconciliation. Owning up to past mistakes will help the Agency address the public’s immense distrust and remove the “thorn in our side” (as one Mt. Hood NF staff member stated) caused by past management practices. **We recommend that new policy identifies all impacts from past management.** Doing so will help prevent repeating mistakes and communicate the nuance of forest resilience projects across the NWFP area.

*Prescribed Fire*

Bark welcomes the inclusion of new plan direction that prioritizes the use of beneficial fire in management projects. Mt Hood NF fire and fuels staff have made great strides in increasing the acres of broadcast burning on the Forest’s east zone, but acreage receiving beneficial fire remains very low. Despite their best intentions and with a recognition that there needs to be more beneficial fire, the FS staff we talk with cite a lack of funding, staffing, poor policy direction, and narrow burn windows as barriers to increasing the scale of Rx burning on the Forest. Moreover, the very public arrest of a burn boss in eastern Oregon in 2022 made fire managers even more risk-averse. Mt. Hood NF’s designation as a Wildfire Crisis Strategy Priority Investment Landscape will help ease funding and staffing barriers, but this does not apply to all forests across the NWFP region.

**New policy should prioritize fire as a standalone management strategy and in combination with mechanical or hand treatments.** Case studies have shown that a combination of thinning and prescribed fire is more effective in modifying wildfire behavior when compared to thinning alone[[1]](#footnote-2). Yet, we continue to see fuels projects that propose only thinning, with little to no fire other than pile burning. Bark assumes that the barriers described above contribute to this ongoing issue.

*Managed Wildfire*

Since time immemorial, fire has played a critical role in forest ecosystems across the NWFP area. It will continue to play a role. As the NOI correctly recognizes, over a century of wildfire exclusion heavily contributed to the densification of dry forest ecosystems.

**It is time to move away from a policy of full suppression and instead empower managers to manage natural ignitions for multiple resource benefits.** Continued aggressive fire suppression is counterproductive to building adaptive resilience to increasing wildfire in the long term. In the United States and Canada, suppression remains the primary approach to wildfire, with more than 95% of all wildfires suppressed. Increasing the use of prescribed fires and managing, rather than aggressively suppressing wildland fires, can promote adaptive resilience as the climate continues to warm.

Planning and management should identify and restore natural disturbance regimes to create resilient landscapes. In some wilderness and roadless areas, management of natural ﬁre regimes appears to have restored successional patterns and resilient landscapes. In other places, creating landscapes where successional patterns, disturbances, and climate dynamics are more in sync will require modiﬁcation of forest structure and composition patterns. Naturally occurring (e.g., wildﬁres) and well-planned human-caused disturbances (mechanical and prescribed burning treatments) can be used to modify successional patterns so they better match the disturbance ecology of the landscapes in question.[[2]](#footnote-3)

As fire regimes shift, individual fire events filter for species adapted to changing fire and climate conditions. Strategic planning for more managed and uncontrolled fires on the landscape may enhance adaptive resilience to changing climate. Promoting more wildfire away from people and prescribed fires near people (in the WUI) are essential steps toward augmenting the adaptive resilience of ecosystems and society to increasing wildfire.[[3]](#footnote-4)

*Post-fire Recovery*

Complex early seral or legacy-rich pre-forest areas created by fire are critically important ecosystems. In the event of fire, it is vital to ensure that post-fire activities (like salvage logging) do not disrupt natural successional processes that produce the biological legacies necessary to regenerate older forests over time.[[4]](#footnote-5) Unfortunately, the NWFP “gave vague and potentially conflicting guidance on protecting old trees and mature and old-growth forests during salvage.”[[5]](#footnote-6)

While fires may produce fuel loading concerns in dry forest stands, the nature of commercial post-fire logging typically results in worsened fire conditions by removing large-diameter snags, which are the type likely to persist on the landscape for the most prolonged period, while leaving significant residual fine fuels and jackpots of logging slash.

Regardless of land classification, we urge the Forest Service to impose further restrictions on commercial post-fire logging to ensure that large fire-killed trees and large live trees are preserved on the landscape to help create more complex early-seral ecosystems. In wet forests, salvage logging should be forbidden except for issues of public safety, such as hazard trees along important roadways. In dry forests, salvage logging should prohibit the removal of large-diameter snags and prohibit the consideration of potential revenue in planning decisions.

The Forest Service should also not only meaningfully consider the impacts of post-fire logging on fire-dependent species, like black-backed woodpeckers, but should also extend meaningful protection to complex early seral forests. Lastly, we urge the Forest Service to favor natural regeneration and avoid artificial regeneration, which contributes to over-dense “reforestation” and disregards important transitional habitat types.[[6]](#footnote-7)

**Mature and Old-Growth Ecosystems**

*Maintain and Expand Mature and Old-Growth*

The NWFP was instrumental in halting the rate of old-growth deforestation across the Pacific Northwest. The containment of the best and most contiguous old-growth into the LSR system successfully preserved forests with old-growth characteristics and preserved the connectivity of these ecosystems across landscapes.

However, as you know, a substantial amount of old-growth was left outside these reserves and was expected to be a part of the harvest base. Because of this, district and forest leadership continued (then and now) to include these areas as part of management projects. These projects go against the current scientific understanding of the importance of these ecosystems, and the “social license” for old-growth logging rapidly deteriorated in the early 90s. The public continues to be staunchly against old-growth logging, leading to continued litigation of projects proposing old-growth logging and draining time and resources from both the Agency and environmental groups.

Therefore, we suggest that **in moist, fire-infrequent old-growth forests, there needs to be strict policy that prevents commercial harvest in old-growth stands outside of LSR boundaries and protections.**

*“Wet vs Dry Forests”*

The NWFP lumps forests within the plan’s range into just two categories: wet and dry. While this can be useful for discussing general characteristics and ecosystem functions, it is overly broad for designing management prescriptions during project planning. In many forests, there are blurred lines between characteristically wet and dry forests, with some displaying characteristics of both wet and dry forests or with wet and dry forest conditions immediately adjacent to each other.

Forests in the NWFP area exist across a spectrum of precipitation gradients dictated by geography and elevation. However, precipitation is not the only factor influencing forest structure and species composition. Site-specific characteristics like topography (aspect, slope) and proximity/access to water can influence an individual stand’s structure and composition. Successful amendments should lean into nuance and recognize that forest ecosystems can vary within a single National Forest and even a single LSR.

*“Reducing Loss Risk in Dry Forests”*

Bark field surveys every proposed forest management project on Mt Hood National Forest. We have seen first-hand how dry forest stands have been altered by a history of fire suppression and the replacement of primary forest with plantations.

While we can see the ecological benefits of active management in altered stands, the management of dry forest ecosystems needs to be approached carefully. Changes to management objectives and priorities for dry forest ecosystems require balancing priorities and clear, objective rules to help ensure public trust and agency accountability.

First and foremost, the objective of every forest project in dry forests should be to create conditions where beneficial fire can be used as either part of the project or during a future project. Target densities for dry forest stands during project planning should be generated by the full collection of site characteristics and features (as described above) and allow for a range of densities to exist across the project area after implementation.

**Most importantly, all forest restoration projects must prioritize the retention of large old-growth trees**, regardless of species. Old-growth trees are the most resistant to fire and are now much rarer due to a history of clear-cutting and selective logging that harvested the largest trees in a stand. Creating resiliency to disturbance in dry forests starts with protecting large trees.

**Tribal and ITEK Inclusion**

Currently, the inclusion of tribal perspectives can vary across Districts and Forests. As we understand it, other than a surface-level consultation required by law and policy, few substantive guidelines are provided for how line officers should meaningfully engage with Tribes during project planning and implementation. So, while some line officers go above and beyond what is required (and we applaud them for this), others stick to the minimum requirements, doing little to build relationships and address past injustices. **This must change.**

It is also important to point out that because of the history between federal land management agencies and Tribes and the inherent power dynamics at play, real meaningful inclusion of Tribal perspectives will take time. Due to the accelerated timeline of this amendment process, Bark struggles to see how the diverse perspectives of tribal members will be able to be incorporated in a meaningful and constructive way.

With that said, Bark supports including ITEK in the formation of policy, collaborative project planning, and implementation. Bark sees this as being especially effective in the beneficial use of fire, the values incorporated into the purpose and need of projects, and the development of metrics to track and report the success of project implementation.

On metrics: One of the metrics often seen, especially as part of the Wildfire Crisis Strategy, is “acres of hazardous fuels treated.” This is an incomplete and myopic way of measuring the success of restoration projects. Indigenous people across the NWFP region used fire to manipulate their environment for thousands of years. While using fire in this way did “reduce fuels,” the primary purpose was the proliferation of first foods, medicinal plants, crafting and construction materials, and habitat for game species.

The values managed for can dictate the timing and frequency of burning on the landscape. One example of this comes from the Karuk and Yurok tribes, where cultural burning regimes promoted high densities of hazelnut shrubs and increased hazelnut basketry stem production.[[7]](#footnote-8)

Interweaving Indigenous knowledge and values with Agency management goals will lead to win–win outcomes (for people and ecosystems) and enable the Agency to track and communicate successes more meaningfully and holistically.

**Sustainable Communities**

The NWFP was intended to balance ecosystem restoration goals with the timber harvest mandates of the Forest Service. However, the initial 1.2 billion board foot estimate was unreasonable from the outset.[[8]](#footnote-9) The plan’s inability to meet the probable sale quantity has been consistently criticized by individuals and corporations who wish to undermine the plan and its ecological successes.

As amendments aim to bolster long-term sustainable economies for rural communities, it is essential that the Agency right-size its’ timber production expectations and recognize the growth and diversification of other economic sectors in the 30 years since the plan’s adoption.

There is a substantial amount of work to be done to restore our forest ecosystems and protect communities from wildfire. Contract crews will be needed for fuels reduction work like hand thinning and prescribed fire, for road repair and stream crossing upgrades, and for creating Firewise communities through home hardening. In conversations with Mt Hood NF staff, we learned that finding local contract crews to support this essential work can be challenging. Additionally, many rural economies have already transitioned to support recreation and tourism as people visit the beautiful landscapes across the NWFP area.

Instead of allowing rural communities to be held hostage by the market forces of one industry (timber), the Agency should invest money and effort into other sectors. Diversifying the economies of rural communities will allow for long-lasting and sustainable employment opportunities.

**CONCLUSION**

We thank you for reading the above comments and hope they will be meaningfully considered and included during the formation of the EIS. To summarize:

* Prioritize using planned, beneficial fire as a management tool across the NWFP area.
* Transition away from a policy of full suppression. Instead, manage natural ignitions (wildfires) for multiple resource benefits.
* Protect post-fire, legacy-rich preforest ecosystems from salvage logging and allow for the natural regeneration of post-fire areas over time.
* In moist, fire-infrequent forests, prohibit the harvest of mature and old-growth forest stands outside of the LSR network.
* Approach dry forest restoration carefully and use site-specific characteristics to formulate target densities. Above all, don’t cut large old trees.
* Give line officers instructions, tools, and guidelines for meaningfully including tribal perspectives in land management project planning and implementation.
* Interweave Indigenous knowledge and values with Agency management goals to track and communicate successes.
* Support the diversification of rural economies and build a workforce to support forest restoration work.

Thank you,

*Jordan Latter*

Forest Watch Coordinator, Bark

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