



Comments Regarding Proposed Amendments to the Northwest Forest Plan

**To: Pacific Northwest Region
United States Forest Service
Portland, Oregon**

From: Friends of the Metolius

Date: February 28, 2025

Submitted Electronically

Friends of the Metolius (FOM) is a conservation group that limits its stewardship to the Metolius Basin, located within the Deschutes National Forest and in the Sisters Ranger District. FOM supports the Forest Service's goal of updating and improving the NWFP and the forest management policies and directions in the plan; such improvements are essential in the face of climate change, among other factors. FOM submits the comments below with both the narrow and limited aim of updating forest management practices in the Metolius Basin, and more broadly, in the entire territory encompassed by the NWFP.

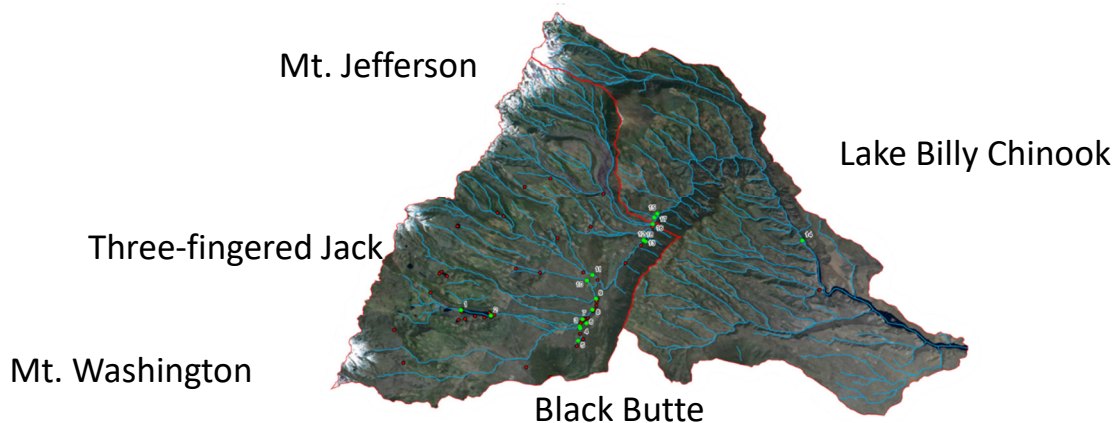
Since its inception 30 years ago, by any measure, the NWFP has had vast impacts on forestry management, communities and ecosystems in the Pacific Northwest. The plan recognized the criticality of protecting much of the region's remaining old-growth forests and riparian habitat while also striving to support local and regional economies dependent on the federal timber supply. To achieve this, the NWFP amended forest management plans for 19 national forests administered by the USFS in Oregon, Washington and Northern California, and 7 BLM plans in Oregon and Northern California. The plan was ambitious and in many ways groundbreaking.

But times and conditions have changed, not only in the northwestern US, but worldwide. FOM believes that climate change and more than a century of fire exclusion are the most compelling drivers that mandate that forestry management practices change in order to adapt to a changing world. FOM supports the necessary changes to the NWFP to adapt it to a changing world. Our comments below are informed by the conditions that mandate new management in our national forests and are offered in the belief that the draft environment impact statement ("DEIS") can be improved by consideration of these comments.

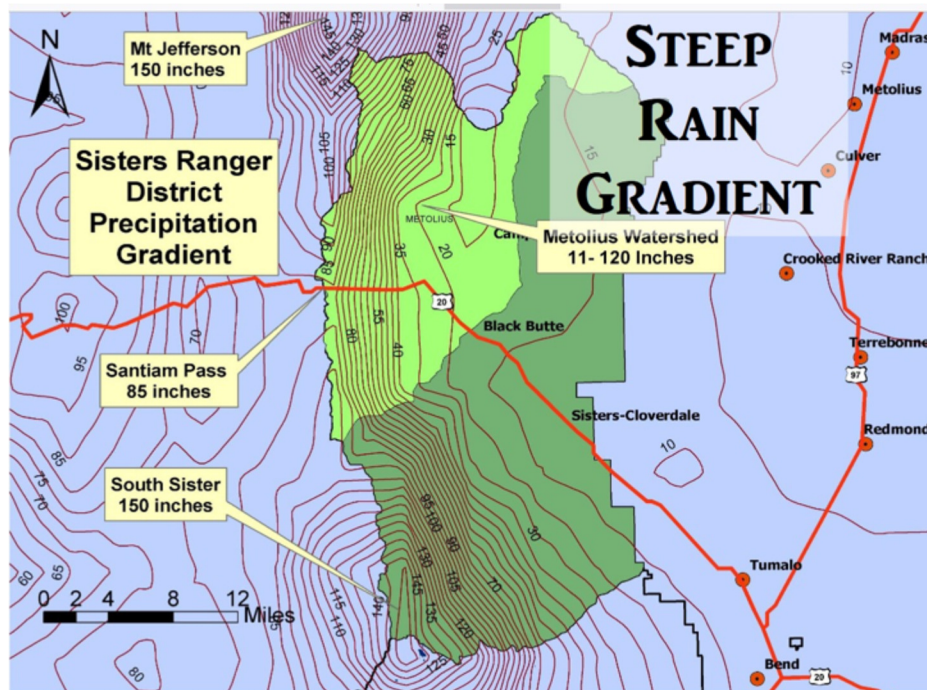
A Brief Summary of The Metolius Basin and the Metolius River

Ninety five percent of the lands within the Metolius Basin are located on lands managed by the Forest Service. The Cascade Mountain range and the Mt. Jefferson wilderness area provide the

backdrop to the west of the basin, with Green Ridge to the East. The unique geology of the Metolius Basin creates springs and highly permeable outwash plains of sand and gravel left by glaciers. The Metolius River is entirely within the basin. It is spring fed, stable, and sensitive to sediment. Considered to be one of the most stable rivers in the world for its size, it is vulnerable to sediment because of the lack of flood events to flush gravels clean.



The Metolius Basin is located on a steep rain gradient on the eastern slope of the Cascade Mountain range. Higher elevations support diverse subalpine, moist, and dry mixed conifer forests. Given the steep rain gradients, and in the context of language adopted in the DEIS, the Metolius Basin includes both moist forests and dry forests.



The basin is renowned for its Ponderosa Pine forests and its old ponderosa pine trees. There is a wide diversity of fire regimes and vegetation in the Metolius Basin. Under FS criteria, all five fire regimes are present. The Metolius Basin experiences frequent burning in the form of

wildfires with increasing intensity over the last century. Although it is not possible to conclusively state the reasons for this trend, potential explanations likely include climatic changes that have given rise to changes to watershed vegetation cover (generally characterized by loss of lodge pole forests and conversion to dense shrub-like cover) and red-flag fire conditions in the dry seasons, and changes to the hydrologic/meteorological regime and anthropogenic sources. In the past 20 years the watershed has experienced more than 19 wildfires larger than a Class D (100 acres or more burned) based on US Forest Service fire data. Several studies have shown that wildfires can raise in-stream phosphorus and nitrogen concentrations by considerable amounts for periods up to several years. FOM has expressed concern that phosphorus-based fire suppressants could influence in-stream water quality. The influence of wildfires on water quality has become an important concern given the extent and intensity of the more recent extreme wildfires, such as the 2003 B and B complex fire.

The Metolius River is recognized worldwide as being a unique resource with pristine water quality. The river has one of the most stable year-round water flows in the world due to large springs that provide a significant portion of the in-flow to the river. The river supports one of the healthiest bull trout populations in the lower 48 states, and historically had large sockeye and spring chinook fisheries. The Metolius is a federal Wild and Scenic River and a state scenic river.

In 2009, in response to public outcry for protection of the Metolius River arising from planning of two destination resorts, the Oregon legislature passed legislation that designated the Metolius and its surrounding basin as the only Area of Critical State Concern in the Oregon. The history of the Metolius river as a federal Wild and Scenic River, a state Scenic Waterway, the Metolius Conservation Area (under the Deschutes Land and Resources Management Plan), a proposed National Park (proposed by the Bend Bulletin in 1913) and a proposed state park, and one of the four originally proposed Areas of Critical State Concern, along with the substantial public use of the area, and its unique water, wildlife, timber and scenic resources distinguish the Metolius from other areas in the state, conserving the resource values of the Metolius for all Americans.

In 1990 the Deschutes National Forest established the Metolius Conservation Area. Within the 86,000-acre conservation area is the designation of ten management areas, including the Metolius Wild and Scenic River Corridor.

FOM's Comments Regarding Proposed Amendments Follow

Summary

Of the alternatives proposed in the DEIS, FOM supports proposed Alternative B, conditioned on Alternative B being amended to implement the following:

1. forest management must be adapted to account for conditions in the forests caused by climate change and over one hundred years of fire exclusion.
2. the plan needs to be more specific when it refers to "treatments," especially in LSRs, and the meaning and metes and bounds of the word "treatments" should be clearly delineated. As currently drafted, "treatment" could mean thinning and burning to one

- reader and it could mean unconstrained logging to another. Clarity is essential.
3. essential old growth forests must be protected; any changes to the age of what trees are “old” or “mature,” must be based on demonstrable, sound science. – for instance, any change that might recharacterize 120 year old trees as being young. There may be sufficient scientific basis for recharacterizing the age of what are old or mature trees but it is not in the DEIS, and the meager support that is offered in the DEIS is entirely inadequate to justify the changes proposed. Old and mature trees must be excluded from harvest in all forest categories and semantics that would allow cutting of old and mature trees, such as “infrastructure protection” and “along existing roads” should be eliminated.
 4. to reduce the inevitable risks to communities from wildfire, fuels must be reduced, especially around the most at-risk communities.
 5. To reduce fire risk around communities in at-risk areas, the NWFP should include a provision that all dispersed camping and all burning of any nature outside of developed campgrounds and designated campsites within a one-mile perimeter surrounding the community is presumptively prohibited, absent a specific finding of need being made by the relevant District Ranger
 6. timber harvests managed in a manner to enhance the above goals should be used to economically sustain rural communities – though this goal is often driven more by macroeconomic factors than by timber availability levels. Support of rural communities is nonetheless very beneficial and needed, and it is critical to maintain the workforce and expertise necessary to support adequate forest practices infrastructure in the Western states.
 7. the NWFP must also recognize that the economies of many rural communities within the NWFP, while once timber based, are now sustained by recreation. Amendments to the NWFP must recognize this reality and account for it in the proposed forest management plans.
 8. indigenous knowledge and inclusion is necessary and essential, and recognition of tribes as sovereign entities should be explicit in the plan. Fire *inclusion* in pertinent landscapes should be adopted with consultation with tribes in forests stands that are suited for lower grade fire.
 9. the NWFP must recognize the forest plans of the many national forests under the NWFP and permit flexibility in implementation to account for local conditions.
 10. eliminate the exceptions to treating stands older than 120 in moist LSR’s.
 11. retain the prohibition on cutting in stands established prior to 1825 in Alternative B.
 12. eliminate cutting more in moist matrix as described in Alternative D.
 13. prohibit tree harvesting based on higher age limit as articulated in Alternative D.
 14. enhance Northern Spotted Owl (“NSO”) habitat; Alternative D will reduce NSO habitat in dry LSR’s by having a goal of maintaining owl habitat reflective of a range of historic conditions, which will essentially eliminate all suitable habitat.

Climate Change and Fire Exclusion

The unfortunate combination of climate change and over a century of fire exclusion have created an urgent need for transformational adaptation to ensure the well-being of NW forest ecosystems and community health both in the short term and into the future. Exacerbating the problems are decades of expansion of communities into the WUI. Given the potential future impacts of climate change, the FS must emphasize climate adaptation measures in amendments to the NWFP. Many regional and tribal adaptation plans already exist, and the FS should partner with tribes and local governments to expand existing initiatives. The USDA's Climate Hub hosts many of these climate adaptation plans and will prove to be a good source of knowledge for this work, including:

- maintain existing older forests
- use regional planning to coordinate changes across management units and jurisdictions
- revise land management goals and objectives to be consistent with dynamic processes and rapid warming under climate change
- increase landscape area devoted to critical NSO habitats and resilient ecosystem
- incorporate uncertainty into planning and make adapting to climate change a long-term, iterative process.

(See Spies, Thomas A., et al., 2010. Climate change adaptation strategies for federal forests of the Pacific Northwest, USA: ecological, policy, and socio-economic perspectives. *Landscape Ecology*. 25(8): 1185-1199.)

The approach suggested by Spies, et al., above, is not new: Climate-Smart Forestry is an emerging branch of sustainable forest management that aims to manage forests in response to climate change. (See Euan Bowditch, et al., "What is Climate-Smart Forestry? a definition from a multinational collaborative process focused on mountain regions of Europe." *Ecosystem Services*. Volume 43. 2020. 101113. ISSN 2212-0416, <https://doi.org/10.1016/j.ecoser.2020.101113>.)

Climate-Smart Forestry has three primary tenets:

- increasing the mitigation potential via carbon sequestration of forests,
- adapting forests to climate change,
- ensuring the sustainable provision of ecosystem services.

Amendments to the NWFP should incorporate strategies akin to Climate-Smart Forestry to achieve the goals identified in the DEIS. Carbon stewardship can be achieved in western moist forests by protecting existing mature and old forests and applying silvicultural practices to accelerate the development of large tree structure in younger forests. In drier forests, such as those east of the Cascade crest in the Metolius Basin where fire exclusion has resulted in high vulnerability to stand replacing wildfire events, restoration treatments should be used to reduce tree density and enhance carbon sequestration as the forest shifts to larger and older trees.

Old Growth and Timber Harvest Management

The reasons for protecting and enhancing old growth forests are well-established. Among other reasons:

- large, old trees do not act simply as senescent carbon reservoirs but actively fix large amounts of carbon compared to smaller trees.
- older trees and forests can store their accumulated carbon for centuries. As a healthy tree ages and continues to absorb carbon, the absolute amount of its stored carbon increases, and even dead, older trees can hold onto their stored carbon for decades—or centuries—as they slowly decay on the forest floor.
- in the forests of the contiguous US, timber harvesting is the largest contributor of carbon emissions by forests, being some seven times greater than all other sources combined including fire, wind, insects, disease and land conversion.
- these forests could be much more effective in the fight against climate change if we protect accumulated carbon stocks in older forests and reduce harvest levels of old and mature trees.
- forests and trees tend to develop structural complexity as they age (more hollows in trees, more snags and downed logs in forests, for example). This complexity fosters biodiversity and can particularly support species that have specific habitat needs.

Amendments to the NWFP must be tailored to support the innumerable benefits derived from sustained old and mature forests. However, as currently drafted many parts of the DEIS are explicitly contrary to these goals. For instance:

- forest stands would be considered “young” even if they are 120 years old. This represents a major change from the previous NWFP definition of “mature” stands as 80 years old. As noted above, the DEIS lacks sufficient scientific evidence that would support such a change and absent sound science, Alternative B should be revised to retain the existing standard for mature stands as being 80 years old.
- logging would be allowed in moist “young” stands up to 120 years old in LSRs (previously restricted to stands up to 80 years old). Again, there is insufficient scientific basis to support this change; it would potentially open up hundreds of thousands of acres to logging that could exacerbate climatic changes.
- rather than continue to prohibit logging activities in moist LSRs unless they restore or accelerate late-successional or old-growth conditions to benefit ESA-listed species, new exceptions would be added to allow logging to “restore habitat for other species that depend upon younger stands” and to “achieve other desired conditions.” Such exceptions must be eliminated else the very nature of LSRs would be gutted.
- salvage logging would be allowed in moist LSRs in certain situations, including “along existing system roads.”
- in moist matrix lands, there would be no practicable restrictions on logging in stands established after 1905 (up to 120 years old), and the FS would enable logging on tens of thousands of acres of matrix lands to bolster timber production. If such management practices are to be included there must be realistic checks and balances; regional forest

plans should be allowed to address these problems. Moreover, the change from stand age consideration to stand establishment dates could mean that old stands never attain the age of protection. It appears that the Forest Service would open to logging somewhere near 1/3 of dry forest stands across all land use allocations (LSRs and Matrix) over 15 years. While stands in Matrix will tend to maintain a stable timber supply, at least some of the old growth trees in Matrix must be maintained for ecosystem resilience. As such, the allowable harvest in Matrix must be reduced to maintain healthy old growth trees and those that will soon mature into healthy old growth trees, while allowing Matrix to not unreasonably reduce the production base due to aging out. Within dry stands, trees older than 150 years receive nominal protection from logging, but the Forest Service includes broad exceptions for “restoration” and “to reduce wildfire risk.” There can be no justification for logging trees over 150 years, even under the guise of reduction of wildfire risk. Ironically, it is trees of these ages that help protect forests from extreme wildfire risks.

- prohibit timber harvest in mature stands originating between 1825 and 1905 in Matrix. The proposed standard of allowing timber harvest to maintain and restore ecological integrity is a high and vague bar that invites litigation of any proposed timber harvest. We do not believe the FS has the social license to harvest these mature stands, even in Matrix. By including these acres that will remain unharvested in the Matrix acre base, the acres available for timber production will be inflated, leading to increased and unsustainable harvest levels.
- according to the DEIS, the FS logged approximately 504 million board feet of timber from the 17 National Forests within the NWFP area in 2023. Under Alternatives B and D, the Forest Service aims to log over twice that amount annually, over one billion board feet.
- the original average annual timber output estimate from the NWFP (1.1 billion board feet) included the 2.6 million acres of Western Oregon BLM lands that typically produce ~200 million board feet but are *no longer part* of the NWFP. The Forest Service now proposes to log much *more* on *less* public lands, meaning the adverse impacts will be even more concentrated.
- in total, the Forest Service aims to “treat” 2.65 million acres per decade across all land use allocations—the equivalent of two and a half Mt. Hood National Forests—with all the attendant adverse impacts from associated road-building and heavy machinery use.

The amendments to the NWFP must be amended to avoid the mistakes noted above.

Support for Rural Communities and Forestry Infrastructure

The amendments implicitly recognize that rural communities need to be better supported with increased production. Said another way, the timber wars of the 1980s and early 1990s need to be avoided. This goal is laudable, as is the goal of preserving timber production infrastructure. However, economic and market realities must be recognized when prospectively considering future harvest targets.

We recognize the need to support local economies and maintain forestry infrastructure with a sustainable supply of timber from the Matrix. To maintain a sustainable level of timber harvest, a

stable land base is needed. For that reason, the 1905 birthdate needs to be fixed to stabilize the acres available for timber production. If the stand cutoff date keeps getting younger, either the acres available for timber production will shrink or the FS will be motivated to do a regeneration harvest before stands reach age 120 to reset stand age to zero.

Moreover, in many forests within the NWFP there have been significant changes in forest usage since the original NWFP was adopted. Recreation is now the biggest economic driver in many forests. As one example, consider the Metolius Basin, where timber harvest was historically an important part of the economy of the nearby communities of Sisters and Bend. Today, the timber infrastructure in those communities is all but gone, replaced by recreational infrastructure. The amendments to the plan should recognize and accommodate these changes. Timber harvest does not usually support recreations infrastructure and most often conflicts with it.

Incorporation of Indigenous Knowledge and Increased Tribal Inclusion

FOM fully supports all efforts outlined in the DEIS to incorporate indigenous knowledge and increase tribal inclusion. Tribes within the territory of the NWFP have stewarded the area for many hundreds or thousands of years before the FS took over management, and possess deep cultural and ancestral ties to the land. Lands that the FS calls “wild lands” are, to indigenous people, “homelands.” Many treaty rights protect continued traditional uses of land ceded to the federal government, like hunting, fishing, and gathering of first foods. These treaty obligations are of immense priority as it is the federal government’s responsibility to consult with tribal nations in decision making and to the fullest extent possible protect tribal treaty rights. Nonetheless, the FS and BLM have failed to meaningfully consult with tribes during the creation of the NWFP. Consequently, the NWFP contains virtually no standards, guidelines, or other plan components pertaining to Indigenous use and stewardship of federal lands.

Where appropriate, and with meaningful tribal consultation, indigenous knowledge of fire *inclusion* should be added to the landscape and should be recognized in the plan amendments. Part of that consultation should be broad-based consideration of the role of fire inclusion in forests changed by climate change.

Simply reciting the obvious need for meaningfully engaging tribes does not make it happen. The FS has a huge job ahead to try to regain the trust that has been lost over many decades of ignoring the knowledge base and sovereignty of tribal nations. The NWFP should be amended to specify standards, guidelines, requirements and other plans for how the FS should implement tribal inclusion into forest management decisions.

Community Resilience in the Face of Wildfires

FOM supports actions to reduce the risks to communities from destructive wildfires, including fuel reduction programs around the perimeter of at-risk areas. Communities have expanded rapidly over the past decades into WUI areas. While the wisdom of zoning laws that have allowed this expansion can and should be questioned going forward, the need to reduce fire risk in these at risk areas cannot at this point be questioned.

To reduce fire risk around communities in at-risk areas, the NWFP should include a provision that all dispersed camping and all burning of any nature outside of developed campgrounds and designated campsites within a one-mile perimeter surrounding the community is presumptively prohibited, absent a specific finding of need being made by the relevant District Ranger.

In addition, the NWFP should direct Forest Supervisors to prioritize the enforcement of Federal Regulations that prohibit residing in National Forest lands (Title 36 CFR 261.10(b)), failing to extinguish a fire (Title 36 CFR 261.5), exceeding 14/28 day stay limits (Title 36 CFR 261.58(a)), possessing or leaving litter / refuse (Title 36 CFR 261.11(b), and failing to dispose of all garbage (Title 36 CFR 261.11(d)).

In summary, FOM supports the direction that the FS is proposing for amendments to the NWFP. As indicated above, alternative B, with specific modifications and with further elucidation is favored. FOM appreciates the opportunity to provide these comments.

Sincerely,

Douglas Hancock

President of the Board of Directors