



Dedicated to the protection and restoration of the Umpqua watershed and beyond through education, training, advocacy and ecologically sound stewardship.

To: USDA Forest Service

March 15, 2025

Re: Northwest Forest Plan Amendment #64745

Thank you for allowing us to comment on the U.S. Forest Service (USFS) draft proposal for amending the Northwest Forest Plan (NWFP). On behalf of Umpqua Watersheds, I offer the following comments on both the proposals and the process. We believe that the alternatives were not thoroughly presented and that a combination of elements from Alternatives A, B, and C should be considered.

Protecting Northern Spotted Owl Habitat and Old-Growth Forests

The NWFP was initially designed to protect species like the northern spotted owl by conserving old-growth ecosystems. The proposed amendments aim to continue this mission but introduce notable changes. Since 1994, the northern spotted owl has shifted from "threatened" to "endangered but precluded." Increasing logging while the owl's population declines is likely to further jeopardize its existence.

The critical habitat designations and the Northern Spotted Owl Recovery Plan outline necessary protection measures, including Recovery Action 32, which recommends retaining all older forests. These forests are critical for combating climate change, preserving biodiversity, and mitigating wildfire risk. Research supports that older forests are more fire-resilient than younger ones due to their thicker bark and moisture retention capabilities. In the Tye Study Area (1985–2019), over 90% of northern spotted owl nest trees showed evidence of previous fires, yet these large-diameter Douglas-fir trees survived.

Contrary to timber industry claims, opening dense canopy stands increases fire risk by allowing more sunlight to dry the forest floor. The introduction of invasive species such as Scotch broom and blackberry further exacerbates fire hazards. Effective wildfire management should focus on reducing undergrowth fuel loads while preserving the canopy's moisture retention capabilities.

When forest stands are opened, they experience a "Vapor Pressure Deficit" or VPD which increases during the summer which in turn reduces tree growth through increased water stress in Douglas-fir in the Pacific Northwest region (Jarecke et al., 2024).

Even though this is a recent publication and more research is needed, it is important to err on the side of caution until the resilience of stands is understood. Modeling sustainable harvest levels are impacted by emerging information related to current and future stressors to the forests of the region.

Opening stands also removes important components for activities of the primary prey of the Northern Spotted owl, the flying squirrel and red tree vole. Both species are negatively impacted by increasing canopy opening (Halloway and Smith, 2011; Piasecki 2023; Wilson 2010).

Retaining Older Forests and Expanding Future Old Growth

Umpqua Watersheds supports provisions that retain existing old-growth forests and enhance the development of future old-growth stands. Misleading claims that old-growth forests exist to be burned or that there is insufficient early-seral habitat only serve to justify further logging. Preserving our ancient forests is essential for maintaining ecological integrity and resilience.

Loss of NWFP-Acreage Due to Administrative Withdrawals

During public sessions, we heard claims that the NWFP has remained unchanged for 30 years. However, this is inaccurate. The withdrawal of the Bureau of Land Management (BLM) from the NWFP in 2016 removed protections for significant portions of ancient forests in western Oregon and northern California (USDI, 2016). Additionally, BLM has transferred parts of O&C lands to the Coquille and Cow Creek tribes, leading to intensive timber harvesting.

While Umpqua Watersheds supports incorporating Traditional Ecological Knowledge into forest management, all alternatives should integrate tribal perspectives on mitigating catastrophic fires through cultural burning.

Impact on Other Land Management Entities

The NWFP's longevity has influenced state and private land management plans, including Safe Harbor Agreements (Hansen 2009) and Healthy Forest Reserve Programs. Many of these programs rely on adjacent federally protected lands to justify their conservation measures. Weakening NWFP protections could undermine these long-term conservation efforts.

Unsustainable Harvest Rates and Stand Aging

The proposed timber harvest levels appear unsustainable. Scientific literature identifies 80 years as the age when stands develop old-growth characteristics (National Research

Council, 1994). The plan should prioritize retaining trees over 80 years old for their ecological benefits and carbon sequestration. Using a fixed date rather than stand age for protection measures is flawed, as it fails to account for natural forest maturation over time. The proposal to shift the old-growth definition to 120 years arbitrarily puts 824,000 acres at risk of logging.

Guideline Errors

On p. A1-18 of DEIS Appendix A, Guideline 01(b) contains an error. The word "younger" should be replaced with "older," or the guideline should be deleted entirely.

Concerns Over Land Use Allocation (LUA) Changes

While the draft amendment states that LUA boundaries will remain unchanged, it proposes modifications to management practices within them. Such changes could lead to increased logging in areas previously protected, undermining conservation efforts.

The Importance of Protecting Entire Old-Growth Stands

Old-growth forests function as complex ecosystems, not just isolated trees. Harvesting that retains only select trees alters stand structure, reducing biodiversity and ecological function. It can take over 80 years for harvested areas to recover their ecological integrity. Comprehensive protection of entire stands is crucial (Lesmeister et al., 2019).

Fire Resilience of Old-Growth Forests

Research demonstrates that old-growth forests are inherently more fire-resilient due to:

1. **Moisture Retention** – Thick canopies and deep-rooted trees maintain a humid microclimate, reducing fire risk.
2. **Fire-Resistant Trees** – Mature trees have thick bark and fewer lower branches, limiting fire spread (Rodman et al., 2021)
3. **Less Flammable Understory** – Old-growth forests have diverse understories that discourage rapid fire spread.
4. **Natural Fire Regimes** – Low-intensity burns maintain ecosystem health.
5. **Climate Change Adaptation** – Old-growth forests store more carbon and retain moisture better than younger stands.

Debunking the Logging-for-Fire-Prevention Myth

The notion that thinning or logging old-growth forests prevents fire is misleading. Instead:

- Thinning opens the canopy, drying the forest floor and increasing fire spread.
- Logging removes the most fire-resistant trees while leaving behind flammable debris.
- Young plantations burn more intensely than old-growth stands (Binkley et al., 2007).

Effective Fire Management Strategies

- Protect old-growth forests and allow natural processes to continue.
- Restore natural fire regimes with prescribed burns.
- Prioritize home hardening and defensible space near communities.

The Harmful Impacts of Additional Roadbuilding

The Forest Service acknowledges that roadbuilding contributes to habitat fragmentation and sedimentation in waterways. Alternatives C and D propose limiting new roads, which Umpqua Watersheds supports. Instead of expanding roads, the Forest Service should focus on utilizing existing road systems in previously harvested plantations.

Conclusion

Preserving old-growth forests is critical for biodiversity, fire resilience, and climate mitigation. The proposed amendments risk undermining these values by allowing increased logging under the guise of management flexibility. Umpqua Watersheds urges the USFS to:

- Retain all old-growth forests and prioritize increasing future old growth.
- Align stand age classifications with current remote sensing technologies.
- Protect entire stands rather than individual trees.
- Implement science-based fire mitigation strategies instead of logging-based approaches.
- Restrict new road construction and prioritize existing infrastructure.

We appreciate the opportunity to provide these comments and strongly encourage the USFS to adopt a conservation-first approach to NWFP amendments.

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Some of the Literature that is pertinent and cited.

Binkley, Daniel; Sisk, Tom; Chambers, Carol; Springer, Judy; Block, William. 2007. The role of old-growth forests in frequent-fire landscapes. *Ecology and Society*. 12(2). Online: <http://www.ecologyandsociety.org/vol12/iss2/art18/>

Hansen, Craig. 2009. Safe Harbor Agreement, Landowner Option Plan, and Cooperative Habitat Enhancement Agreement: Port Blakely Tree Farms, Morton Block. Prepared by: Jones and Stokes.

Holloway, G.L. and Smith, W.P. (2011), A meta-analysis of forest age and structure effects on northern flying squirrel densities[±]. *The Journal of Wildlife Management*, 75: 668-674. <https://doi.org/10.1002/jwmg.77>

Jarecke, Karla M., Kevin D. Bladon, Frederick C. Meinzer, Steven M. Wondzell, Impact of rainfall and vapor pressure deficit on latewood growth and water stress in Douglas-fir in a Mediterranean climate, *Forest Ecology and Management*, Volume 551, 2024.

Lesmeister, D. B., Sovern, S. G., Davis, R. J., Bell, D. M., Gregory, M. J., & Vogeler, J. C. (2019). Mixed-severity wildfire and habitat of an old-forest obligate. *Ecosphere*, 10, e02696. [10.1002/ecs2.2696](https://doi.org/10.1002/ecs2.2696)

National Research Council. 1994. *Scientific Basis for Ecosystem Management in the Interior Columbia Basin*. Washington, DC: National Academies Press. <https://nap.nationalacademies.org/read/4983/chapter/5>.

Piasecki, Jason T. 2023. *Red Tree Voles In Fragmented Forests*. : Oregon State University.

Rodman, Kyle C., Thomas T. Veblen, Robert A. Andrus, Neal J. Enright, Joseph B. Fontaine, Angela D. Gonzalez, Miranda D. Redmond, Andreas P. Wion. A trait-based approach to assessing resistance and resilience to wildfire in two iconic North American conifers. *J Ecol*. 2021; 109: 313–326. <https://doi.org/10.1111/1365-2745.13480>

USDI, BLM, Northwestern and Coastal Oregon Record of Decision and Approved Resource Management Plan, Coos Bay, Eugene, Salem Districts, and Swiftwater Field Office of Roseburg District. August 2016

Wilson, Todd M. Limiting factors for northern flying squirrels (*Glaucomys sabrinus*) in the Pacific Northwest: A spatio-temporal analysis, Union Institute and University ProQuest Dissertations & Theses, 2010. 3470364.