



March 16, 2025

Jacqueline Buchanan
Regional Forester
U.S. Forest Service
1220 SW 3rd Avenue
Portland, OR 97204

Submitted via webportal

RE: Northwest Forest Plan Amendment Draft Environmental Impact Statement

Dear Ms. Buchanan:

Southern Oregon Forest Restoration Collaborative (SOFRC) is regional nonprofit engaging with diverse constituencies on forest health and wildfire risk projects to support resilient landscapes, thriving communities, wood manufacturing and workforce development. SOFRC's vision is based on a strong community and science-based approach that emphasizes collaborative problem solving over top down decision making to reach sustainable decisions.

SOFRC recognizes the importance of amending the U.S. Forest Service's Region 5 and Region 6; California, Oregon, and Washington; Forest Plan Amendment for Planning and Management of Northwest Forests Within the Range of the Northern Spotted Owl (NWFP Amendment) Draft Environmental Impact Statement (89 FR 90280 EIS No. 20240208).

1. In reference to the dry forests of southern Oregon, SOFRC supports the following recommendations:
2. Emphasis on ecological restoration through active management, particularly using prescribed fire and mechanical thinning to reduce fuel loads and restore historical forest structure
3. Focus on creating forest conditions more resilient to climate change, drought, and wildfire risks
4. Prioritization of treatments in the wildland-urban interface and areas with high fire risk
5. Retention of large and old trees while removing smaller diameter trees to reduce stand density
6. Integration of indigenous knowledge and traditional ecological practices, particularly regarding fire management
7. Adaptive management approach that allows for adjustments based on monitoring results and changing conditions
8. Streamlined environmental review processes to accelerate the pace and scale of restoration treatments

9. Protection of wildlife habitat, particularly for species dependent on dry forest conditions
10. Watershed protection measures to maintain water quality and quantity in dry forest ecosystems

All of the recommendations are important, and our comments point out and emphasize suggested areas for improvement.

Dry vs. Moist Forest

We support the recognition that dry forests need to be managed with stewardship using ecological active management techniques. However, creating a dichotomy between dry and moist forest leads to describing moist stands within dry forests and dry stands within moist forests. Instead, illustrating the continuum of fire regimes would be more helpful. Assuming some moist forests burn historically beyond 200 years and some moist forests burn every 35 to 70 years, different landscapes and habitats are created. The 30-70 year fire regimes historically developed a mosaic of even-aged stands while the longer return interval created a succession of changing stand conditions. This awkward rule set based on moist vs. dry forests will lead to difficult and convoluted analysis of proposed treatments.

Alternatives and key changes from the original NW Forest Plan

While SOFRC can support all of the alternatives, we recommend elements of Alternative B-the proposed action, Alternative D, and in one instance, Alternative C be incorporated into a blended Alternative. Below is a short list of recommendations for proposed changes by alternative that would best be implemented in the amended Northwest Forest Plan.

Key Activity or Topic	SOFRC Alternative Preference	Rationale
Forest Stewardship Salvage Late Successional Moist	FORSTW-LSR-MOI-STD-02 B	System roads need to be maintained.
Forest Stewardship-Matrix Moist, Ecological Resilience	FORSTW-MTX-MOI-OBJ-01-B	Moist forests will grow into old growth; less of a priority than dry forest for active treatment.
Forest Stewardship, All LUAs	Dry Forest FORSTW-ALL-DRY-OBJ-01-B	More treatment are needed sooner.
Forest Stewardship, All LUAs, Dry Forest	FORSTW-ALL-DRY-STD-01-B	AS time passes, trees born before 1850 are older and older and fewer will be retained. Retain trees over 150 years of age.
Forest Stewardship – Managed Late-Successional Areas, Dry	FORSTW-LSR-DRY-DC-01-)	Maintain the historical range, not based on home ranges identified during one period of time.
Forest Stewardship – Managed Late-Successional Areas, Dry	(FORSTW-MLSA-DRY-DC-03-C	Maintain suitable habitat reflective of a range of historic conditions within the inherent capability of the landscape given expected fire activity and climate change.
Forest Stewardship—LSR and MSLA, Dry	FORSTW-ALL-DRY-GDL-03-B	Salvage is rarely conducted with oversight and attention to ecological conditions. Standards are needed.
Fire Resilience – All LUAs	FIRE-ALL-OBJ-01-D	More active management is needed given the failure to treat over the last 150 years.
Fire Resilience – All LUAs	FIRE-ALL-OBJ-02-D	Wildland fire is not enough in the near future; prescribed, unplanned and cultural all provide the right tools.

Fire Resilience – All LUAs	FIRE-ALL-GDL-05-D	All tools are needed. In dry forests, there are a variety of habitat, cultural, safety and reasons such as smoke management to use prescribed, tribal cultural and unplanned ignitions.
Fire Resilience – All LUAs	Fire-All-PMA-13 B	Standards are needed.

Thank you for the opportunity to comment on the proposed amendments to the Northwest Forest Plan.

Sincerely,

Terry Fairbanks

Terry Fairbanks
Executive Director, SOFRC
541-292-4498
tfairbanks@sofrc.org