



March 17, 2025

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

Submitted via webform:

<https://cara.fs2c.usda.gov/Public//CommentInput?Project=64745>

RE: Pew Comments on the Northwest Forest Plan Amendment & Draft
Environmental Impact Statement

Dear Regional Forester Buchanan:

The Pew Charitable Trusts (Pew), writes to share comments and recommendations on the U.S. Forest Service's proposed amendment to the Northwest Forest Plan (NWFP), as presented in the agency's Draft Environmental Impact Statement (DEIS) of November 2024. Pew supports Alternative B, with a few modifications.

The U.S. Conservation program at Pew advances common sense solutions that address the impacts of a changing environment on nature and people, in collaboration with policymakers, Tribes, and stakeholders. Pew has a long history of engaging in forest management issues in the Pacific Northwest, including the original NWFP of 1994. In light of advances in scientific understanding and changes (both present and predicted) in ecological and social conditions across the region since the plan's initial adoption, Pew supports a targeted amendment that (1) addresses select aspects of the original plan, as defined by the DEIS's Purpose and Need statements, and (2) is derived from the consensus recommendations provided by NWFP Federal Advisory Committee (FAC), comprised of diverse stakeholders. An amendment that adheres to these principles would provide a consensus-driven, science-based adaptive management framework for this important landscape. To this end, Pew believes Alternative B, with a few modifications, would best achieve this objective.

The Purpose and Need Provides a Clear Basis and Focus for Amendment

The DEIS's Purpose and Need statements present a clear basis and focus for this amendment: to "better enable the agency to meet the original intent of the 1994 NWFP to conserve mature and old-growth ecosystems and habitat for the conservation of northern spotted owl and other Endangered Species Act (ESA) listed species and non-listed species, protect riparian areas and waters, and provide a sustainable supply of timber and non-timber forest products" (DEIS, Vol.1, pg.1-4 to -5). Critical to the integrity of the amendment, the agency also states: "This process is driven by evolving ecological understandings and the need for the Forest Service to adapt their management strategies to current and future challenges" (*id.* at pg.1-5). Grounding the amendment in the best available scientific information, as presented by the agency in its Synthesis of Science (2018) and Bioregional Assessment (2020), as supplemented, will help to ensure the management direction in the final amendment accounts for new knowledge gleaned through monitoring of the plan's implementation over the last 30 years, as well as account for anticipated future changes, such as shifting patterns in temperature, precipitation, drought, and wildfire activity.

Additionally, the acknowledgement of the exclusion of Indigenous perspectives, values, and knowledge from the original plan, and the agency's efforts to redress that omission through its Tribal engagement activities and the Tribal Inclusion sections of the DEIS, is an important step for enabling all communities facing environmental changes are a part of building resilient human and natural systems that reflect their values and needs.

Federal Advisory Committee Presents Pragmatic, Collaborative Solutions

Recognizing the breadth of values, perspectives, and uses in relation to the NWFP area forests, Pew was supportive of the U.S. Department of Agriculture's decision to establish a FAC composed of representatives from the timber industry, Indigenous Traditional Ecological Knowledge practitioners, forest ecology, conservation, outdoor recreation, and others, to provide advice and recommendations to the Forest Service on targeted updates to the NWFP. **The consensus recommendations developed by the diverse participants of the FAC present a thoughtful, pragmatic, and broadly supported set of goals and strategies to the identified challenges.**

Pew was encouraged to see the majority of the FAC's recommendations reflected in the DEIS's Alternative B (the proposed action). We respectfully request the Forest Service to further align the final amendment with the FAC's recommendations in a modified Alternative B, and offer the following recommendations:

- Recognizing that all forests contain a mix of seral stages, modify FORSTW-LSR-MOI-GDL-01 to clarify that its intent is not to direct management in Late Successional Reserves (LSRs) toward species dependent on younger stands, which would be inconsistent with the purpose of LSRs.
- Strike the wildfire risk reduction exemption from FORSTW-MTX-MOI-STD-01, because old trees are more resistant to wildfire and, therefore, should not be the focus of vegetation for management risk reduction.
- Modify FORSTW-MTX-MOI-GDL-01 or create a new Standard from it to clarify that timber harvest in moist mature stands within the matrix must move that stand toward greater late-successional characteristics.
- Add "previously managed" to FORSTW-MTX-MOI-PMA to further prioritize areas with an anthropogenic disturbance history for active management.
- Modify FORSTW-ALL-DRY-STD-01 and FORSTW-ALL-DRY-GDL-02 so that they also direct retention of a sufficient number of large trees that may not have reached the 150-year threshold to redress the deficiency of old-growth trees in dry forest landscapes.
- Clarify FORSTW-ALL-DRY-GDL-03 to make clear that economic considerations are not an appropriate reason for salvage logging in LSRs, as this would be inconsistent with the intent of the original plan.
- Incorporate into an appendix examples from the scientific literature of best practices for "ecological forestry," which the DEIS defines as "utiliz[ing] ecological models from natural forest systems as a basis for managing forests" (DEIS, Vol.2, App.F, pg.F-2), in order to provide the public and land managers a common baseline for understanding what type of active interventions might meet this important threshold for intervention, which is included across numerous plan components.
- Provide more detailed maps of the initial, coarse-scale bifurcation between Dry and Moist forest types to increase transparency and public awareness during project-level implementation.

- Further articulate in the Final EIS how Alternative B would generate the projected increases in timber volume, forest products employment, and labor income (see DEIS, Vol.1, Table 3-27), as compared to the No Action Alternative, and also greater quantities of these as compared to the other two action alternatives.

Given the great value of bringing together diverse perspectives to tackle challenging management issues and reach consensus recommendations—with the potential for long-term, cost-effective solutions for communities, the federal government, and stakeholders—we encourage the agency to change course and retain the FAC, which can serve as an important sounding board as the agency works to finalize the amendment in response to public comments.

Conclusion

The Forest Service has a significant opportunity to emphasize the important roles of science and collaboration in federal land management by finalizing a forward-looking amendment to the NWFP centered on recommendations of the FAC, and Pew looks forward to continuing to work with the agency, Tribes, and stakeholders toward that end. After the amendment's finalization, continued monitoring and adaptive management of these vital lands and waters will be needed to secure a vibrant future of both people and nature across the Pacific Northwest.

In addition to our comments and recommendations above, Pew supports the recommendations provided in the comment letter submitted by Silvix Resources, et al.

Thank you for your consideration of Pew's input. If you have any questions, please do not hesitate to reach out at bbusse@pewtrusts.org or (720) 822-5998.

Sincerely,

A handwritten signature in black ink, appearing to read "Blake Busse", written in a cursive style.

Blake Busse
Officer, US Conservation
The Pew Charitable Trusts