

NWFP EIS Amendment Comments

Overview

We applaud the efforts to the Advisory Committee and planning teams for the Northwest Forest Plan (NWFP) Amendment, who worked under tight timelines to address extremely complex ecological and social issues surrounding climate change adaptation strategies for the Plan area. We also commend the respectful incorporation of Indigenous Knowledge and need for Tribal consultation and co-stewardship in this draft EIS. Our comments are intended to help improve and clarify their presented work.

The management of National Forests in the Pacific Northwest needs a monumental shift in emphasis to adequately address the impacts of past management and the current and future impacts of climate change and wildfires. No longer is the primary threat timber harvest, yet the agency struggles to move on from these longstanding issues, and lacks the social license and trust in many situations to complete the needed paradigm shift.

As written, all four of the NWFP proposed alternatives do not address a critical reality about anthropogenic climate change and wildfires. Under accelerating climate change, broad zonations of “dry zone” and “moist zone” forests no longer apply and will only become more irrelevant over time. Zonation by biophysical setting is required to identify moist temperate rainforests and coastal forests that are likely to continue to be moist under seasonal climate and weather conditions. As such, only a portion of the NWFP of the “moist zone” forests will remain classified as “moist” forest and the remainder is seasonally dry and predisposed to drought and extreme wildfires. This is evidenced by increasing incidence of wildfires in northwestern California and western Oregon, which will be followed by increased wildfire activity in western Washington in the coming decades. Already, western WA and OR forests are predisposed to dry season wildfires for several weeks in the late summer and early fall. This window of fire hazard will only increase in the coming decades. Across the remainder of the NWFP area, continued fire suppression and accumulating hazardous fuels constitute an existential threat to late successional and old forest habitats. Within historically frequent fire systems, old trees are increasingly threatened by high stocking levels, which predispose them to mortality by drought, forest insects and pathogens, and wildfires.

The original NWFP directly addressed the threat of timber harvest which, compared to climate and wildfire impacts, is predictable and within agency decision authorities. However, climate change effects are a different matter. The high degree of uncertainty associated with climate change, wildfires and other disturbance agents requires that proactive rather than reactive management approaches are supported by National Forest leadership and place-based managers. Based on this reality, the proposed “No Action” alternative is the most consequential of all because it contains ongoing, active fire suppression across the NWFP area and thus contributes to the chronic and mounting fire deficit and hazard to stand-replacing wildfire events. Continued reactive approaches will allow wildfires to do most of the management on NWFP lands and lead to the erosion of old forest habitat. In light of this, this amendment takes important steps towards shifting emphasis towards landscape and ecosystem resiliency but does not articulate how proactive and adaptive management would be accomplished. Clearly articulated “management or ecological thresholds” that would prompt management adaptations would be an initial step in making adaptive management happen.

Additionally, an important lesson from the existing NWFP is that the wording used in standards and guidelines can greatly affect how they are interpreted and applied. Conflicting terminology can challenge planning and consultation teams who are trying to understand “management

intent”. We thus provide examples of this concern showing where the present language used in the amendment that can be clarified in the final EIS and preferred alternative.

General Comments

- 1) Use of beneficial fire is mentioned but not specifically addressed in each alternative, including the no-action alternative which continues the highly active management decision to continue suppressing wildland fires in fire-dependent ecosystems. More than forest thinning, increased use of prescribed underburning, hand piling and burning, and support for the revitalization of cultural burning practices is critically needed in semi-arid forests across both sides of the Cascades. Equally importantly, opportunities to increase the work of managed wildfires during relatively mild weather and fuel conditions are critically needed to rebalance the work of wildfires from one currently dominated by wildfires that burn in the driest, hottest, and windiest parts of the year to one that also include wildfires that burn under marginal and thus mostly benign conditions.
- 2) Vague and inconsistent terminology needs to be addressed. Multiple terms are used to describe dry forest or fire-prone forests, including “dry forest,” “fire-prone” forests” and “frequent fire” forests. Are these intended to be synonymous? All forests of the NWFP are fire prone. Some have frequent and moderately frequent return intervals, and all return intervals are undergoing change under climatic warming. Specific definitions of biophysical settings and associated historical and projected future fire regimes are needed.

Similarly, terms used to describe forestry are vague and inconsistent. Are forest stewardship and ecological forestry the same? If not, they need to be carefully described and consistently applied.

- 3) The use of an “Owl Site Threshold” (Alternative C), including take guidelines or median amounts, is unrealistic and problematic when applied to dry forest landscapes for the following reasons:
 - (a) In many dry zone landscapes, the current amounts of NSO habitat are a result of decades of fire suppression and over 150 years of fire exclusion deriving from curtailed Indigenous burning. Fire-excluded forest structure and composition across these landscapes is not sustainable and contributes to high risk of severe wildfires and insect outbreaks.
 - (b) Use of the “Owl Site Threshold” in are not consistent with the “ecological integrity” goal of the 2012 plan rule. Ecological integrity is defined as *“the quality or condition of an ecosystem when its dominant ecological characteristics (composition, structure, function, connectivity, and species composition and diversity) occur within the natural range of variation”*. The natural range of variation is used as an “ecological reference model” to assess whether an ecosystem has “integrity” (FSH 1909.12). Recent science from eastern Washington (Halofsky et al. 2024) found that the natural range of variability of spotted owl habitat in dry forests was 18-24% of a landscape, well below the 40% threshold in take guidelines. In addition, few northern spotted owl sites in eastern Washington dry forests ever had 40% of their home range in suitable habitat. By managing at the 40% level, this direction greatly compromises ecological integrity and puts landscapes at considerable risk of uncharacteristically severe wildfires.
- 4) For dry forests, there is no need to distinguish between LSR and Matrix lands. Within NWFP lands of eastern Oregon and Washington, management guidance as written in the amendment is similar across dry forest land allocations, which focuses on the restoration of frequent fire regimes and retention and recruitment of old trees. Thus, given the similar

guidance for dry forests in eastern OR and WA, distinguishing between LSR and matrix lands only adds confusion to the management intent. This will lead to multiple interpretations and legal stalemates in contested landscape restoration projects. This is the current problem with the “risk reduction” terminology used in the existing dry forest LSR management direction.

- 5) It is critically important to distinguish and describe the different types of ecological late successional and old growth forests in the context of their native disturbance regimes so managers know what their desired forest conditions should be. Within eastern OR and WA, most current late successional (LS) and old forest (OF) is the result of past management and fire exclusion, and is not true ecological late successional or old forest habitat. In eastern OR and WA, there are many acres of forest that have developed into closed-canopy multi-layer stands with a few larger trees in the overstory that are a result of decades of fire suppression and selective cutting. These are often identified as mature or old growth forests when they are considerably departed from their natural range of variability and are at extreme risk of high severity fire. Many acres of dry and moist mixed coniferous forest within eastern OR and WA are in need of active management to create and maintain open, highly variable, stand with large trees and few large snags. Clearly articulating this as an important habitat objective for a host of wildlife species and as a management objective is critical to resolving interpretation conflicts that are common for planning teams under the existing NWFP. Based on recent research by Johnston et al. (2023), understanding of historical fire regimes in the western Oregon Cascades is being refined to reflect that much of the OR Cascades range supported mixed severity fire regimes with much more frequent fire return intervals than previously thought. Abundant evidence already supports knowledge of historically frequent fire regimes in northwestern CA. As such, clear geographic delineations of moist forests with infrequent fire regimes in western OR, and WA are needed to define targets and management directions for late-successional, multi-layered forests.
- 6) Landscape planning (FORSTW-ALL-GDL-03-B). This is a good list of items to consider, but for landscape scale restoration projects, a landscape evaluation and landscape prescriptions should be required as a Standard. Well-established and scientifically-vetted approaches are available (see Hessburg et al. 2013, 2015; Donato et al. 2019). A list of required items for a landscape evaluation should include a departure analyses using estimates of the historical and future range of variation, projected changes in moisture deficits, an evaluation of the sustainability of wildlife habitats (using fire risk and moisture deficits), and a process to identify amounts and priority treatment areas.
- 7) No change in review of LSR assessment or projects in LSRs is specified. The current LSR review process is onerous, often resulting in significant delays and work stoppages. In part this is because of conflicting interpretations of the dry and moist forest risk reduction management direction in the existing NWFP, which a revised version of this proposed amendment should help clarify.
- 9) The LSR workgroup review process needs to be greatly updated, refocused, and overhauled to be effective. The LSR workgroup is intended to provide consistent interpretation of plan direction across the NWFP area. That has not been the result. In the past, the LSR workgroup was primarily tasked with assuring that timber harvest planning was consistent with LSR goals and objectives. It is not a well suited body to address forest resiliency, integrity, habitat suitability specified by this amendment. To address these broader goals and objectives will require a high level of scientific competence, with

scientists representing a broad array of disciplines, and considerable staff time dedicated to rapid and efficient review and feedback.

- 10) We applaud the use of a Standard to protect “old” trees (FORSTW-ALL-DRY-STD-01-B). In forests that historically were maintained by a frequent fire regime, old, fire-resistant trees are maintained through underburning and survival over time in generally open-grown forests that are resilient to drought and wildfires. Although forests that are maintained by low and mixed-severity fire regimes are uneven-aged, the native fire and disturbance regimes favor old trees over time. As such, old trees are keystone structures and important biological legacies both as living and standing dead trees.

Specific Comments on Alternative and Effects Section

- Under climate change, a “No Action” alternative is in name only. This alternative poses the greatest risk to old forest habitat of all alternatives considered in this draft EIS because it inherently includes continued suppression of beneficial early season and late season fires that could reduce overall fire risk to NWFP forests and thus contributes to continued hazardous fuel accumulations in most of the NWFP area with the exception of coastal and temperate rainforests.
- Alternative B and Proposed Action emphasize ecological forestry without clear direction of fire use to reduce hazardous fuels. The phrase “...*using ecological forestry methods to bolster timber production...*” is problematic. The point of ecological forestry methods is to manage healthy forest development over time motivated by ecological objectives with a fiber recovery opportunity often but not always associated. Word choice matters. The term “Timber Production” implies a narrow focus on economic issues while ignoring ecological issues. Many interpret timber production and ecological forestry to be mutually exclusive. Perhaps something like “*use ecological forestry methods to manage healthy forest development over time motivated by ecological objectives with a fiber recovery opportunity often but not always associated.*”

We also recommend that Alternative B expand the focus of ecological forestry to restoring beneficial fire and employing fire hazard reduction across fire-prone landscapes.

- We strongly urge that CLIMATE-GDL-03-D regarding management of recreation facilities become part of the preferred alternative in the final EIS.
- Page 3-22, 3-23 Trends in Late-Successional and Old-Growth in the NWFP Area. The use of the NWFP monitoring information is helpful, but monitoring data are available that extend beyond 2018, which is important because considerable losses have occurred since that year. Hopefully in the final EIS, this information can be updated to reflect these losses as they are important in justifying why this amendment is so critical.
- Another important item to note is that the “typical” old growth in dry and moist mixed conifer forests comprised of very large trees, open canopy and complex spatial arrangement is highly departed from historical conditions, there is much less of this forest type than occurred historically influencing habitat availability for a wide range of wildlife species (e.g., see Wisdom et al. 2000, Donato et al. 2024, Gaines et al. 2017, 2022). Highlighting the need to actively restore these habitats should be discussed in this “trends” section. Active management treatments have been shown to be highly effective in restoring these habitats if thoughtfully designed (see Gaines et al. 2007, 2010).

- Page 3-29 under All Action Alternatives states that *“These stand conditions would result in the loss of dense canopy stand and habitat for associated species, but would be more reflective of historical natural conditions, enhancing sustainability”*. We suggest also acknowledging that one of the rarest and highly departed habitats is large and old tree open canopy habitat in dry forests that would be greatly enhanced by management that improved the abundance and connectivity of these habitats. In the eastern WA Cascades for example, more than 80% of the ponderosa pine habitats were in this condition, and in the dry and moist mixed conifer forests, 30 and 20% of those forest types were in open canopy conditions (Hessburg et al. 2019).
- Page 3-30 under All Action Alternatives states that *“Outcome of managing under this plan direction would be similar to LSRs, including reduced risks to older trees in dry forest from fire, drought, and insects. However, the overall differences in purposes between Matrix and LSR established in the 1994 NWFP would continue to apply”*. Again, this is problematic and confusing language that can be interpreted in a variety of ways meaning that planning teams and consultation teams will struggle and the default will be the most conservative interpretation as has occurred in the past.

•A major emphasis of this amendment is to clarify that active management is critical in dry forests, independent of LAU. Thus, the proposed management guidance has considerably **reduced** the differences that were intended in the original NWFP to a degree that, under this amendment, dry forest LSRs and dry forest Matrix have essentially the same management direction. Yet, the statement *“purposes between Matrix and LSR established in the 1994 NWFP would continue to apply”* suggests just the opposite. In reality, the purposes between Matrix and LSR from the 1994 NWFP were never realized, which is why the PSQ levels were never achieved. In many cases, much of the Matrix is now critical habitat and the language of the 1994 NWFP greatly limited treatment in LSRs because the intent was not clearly articulated.

Specific Comments on the Proposed Action (Appendix A.1)

- Page A1-15 Desired Conditions 04. Not sure this is possible under climate change. Northern spotted owl habitat provides essential functions for their recovery. In the dry forests the presence of Douglas-fir and its dwarf mistletoe is very important component of these functions. However, climatic water deficit (CWD) projections suggest that many of these areas will transition to non-forest or savanna, meaning the functions they can provide will change considerably.
- Page A1-15 Desired Conditions 06. Not useful and perhaps confusing to list species in this DC. Suggest “provide habitat and connectivity for wide-ranging habitat generalists, semi-specialists, and habitat specialists within the context of the natural range of variation”.
- Page A1-15. Guidelines. 01. Need to insert the term “landscape” so something like “distinguish between moist and dry forest ecosystems at the landscape and stand scales”.
- Page A1-16 Guidelines 03. We strongly suggest that this be made into a **Standard** that requires a landscape evaluation for landscape scale forest restoration. Required elements would include departure from the natural range of variation (preferably HRV and FRV), moisture deficit the fire risk projections, wildlife habitat sustainability, and the amount and location of priority treatment areas.

- Page A1-18 Moist Forest Matrix. Background. Change “timber production” to “ecologically oriented timber harvest”. Timber production is not consistent with the ecological components in the Matrix, resulting in mixed and conflicting intent.
 - Page A1-20. Top of the page under Objective states “*using ecological forestry methods, to bolster timber production.*” These are conflicting objectives. Suggest something like “using ecological forestry methods, to achieve forest health objectives...”
 - Page A1-21. Desired Conditions. Dry Forest. We suggest adding a desired condition that explicitly addresses how ecological resilience will be assessed and achieved (as per 2012 plan rule). Something like “*forest structure and composition at the landscape and stand scales are within or moving towards the HRV or the FRV ideally*”.
 - Page A1-23. Potential Management Approaches. The final paragraph starts “*Contribute to the conservation and recovery of federally listed species...*” While this is an appropriate consideration, it is also what sparks controversy and challenges to planning teams because it does not set any boundaries on how much spotted owl at a landscape scale is ecologically appropriate to meet the intent of “*contributing to the conservation and recovery...*”.
- It would be very helpful to add something like the following “...and restores dry forest ecological structure, composition and processes **to within the natural range of variability and eventually towards the FRV.**” This would help clarify to planning teams that the amount of NSO habitat needs to be within the bounds of the ecological system in the context of its climatic and fire regimes and still meet ecological integrity and sustainability objectives.
- Page A1-28. Desired Conditions. Climate. 01. Again, how does a planning team know if they area moving landscapes towards “*a diversity of ecosystems, where plant and animal communities are supported by healthy ecosystem functions and diverse, healthy, resilient habitats*” ?. What does the term “healthy” mean in this context. Define it. The 2012 plan rule define ecological resiliency as “*the quality or condition of an ecosystem when its dominant ecological characteristics (composition, structure, function, connectivity, and species composition and diversity) occur within the natural range of variation*”. So why not something like “*The composition, structure, and function of national forests reflect the diversity of ecosystems within or moving towards the natural range of variability.*” This provides much more guidance for planning teams to be able to apply.

Appendix C. Draft Biological Evaluation.

- Some of the R6 Sensitive species, such as the white-headed woodpecker, have been shown to respond positively to dry forest restoration treatments. The determination could be changed to Beneficial.

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