



March 17, 2025

Comments on Proposed NWFP Amendment  
USDA Forest Service  
1220 SW 3rd Ave Ste. G015  
Portland, OR, 97204

**RE: Northwest Forest Plan Amendment Draft Environmental Impact Statement No. 20240208, Numerous Counties within California, Oregon, and Washington, 89 Fed. Reg. 221 (November 15, 2024).**

Dear Regional Forester:

Thank you for the opportunity to comment on the Draft Environmental Impact Statement (DEIS) captioned above. The American Forest Resource Council (AFRC) is a trade association representing mills, wood product manufacturers, loggers, and purchasers of public timber in the Western United States. Put another way, AFRC represents stewards of our public lands, customers, and partners of the U.S. Forest Service. We have member companies throughout the Northwest Forest Plan (NWFP) area who have been, are currently, and will be impacted by the NWFP, an amendment, and its implementation. Their expertise, employees, and equipment – and the vast, complex product supply chain of the forest infrastructure they help create, maintain, and support – are essential to achieving the forest management goals and missions of the Forest Service.

## **INTRODUCTION**

We believe that the Forest Service shares AFRC's desire to improve the effectiveness of the NWFP through this Amendment. Much of the substance in the proposed Amendment indicates a desire to modernize the NWFP to expand the level of active forest management in a manner that increases timber supply and improves overall forest health, including the mitigation of wildfire risk. These outcomes are paramount to the health of our National Forests and the long-term viability of our members. These outcomes are also aligned with key components of the

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Executive Order (EO) on the *Immediate Expansion of American Timber Production* signed on March 1, 2025. That EO, which lays the foundation for the timber and forest management policy goals of the new administration, emphasizes that the production of wood products is critical to our Nation's well-being and that the United States has an abundance of natural resources capable to meet those production needs. The EO also explicitly references onerous Federal policies that impede the Forest Service from effectively contributing forest products to meet these needs, while also mitigating wildfire risk and conserving fish and wildlife habitat. **The NWFP Amendment must clearly show that it is consistent with the purpose, intent, and direction of all components of the EO.**

Ostensibly, the proposed Amendment aims to fulfill these goals through new and modified directives. The DEIS provides a comparison of treatment acres and timber volume between the status quo and the Amendment: 212,000 acres treated and 4,446 MMBF sold, and 735,000 acres treated and 9,700 MMBF sold respectively. **However, there remains a stark disconnect between attainment of these goals and existing obstacles embedded in the NWFP that will prohibit that attainment.** This disconnect also complicates alignment between the proposed Amendment and the stated goals of the recent EO on timber production.

On February 2, 2024, AFRC provided written comments in response to the Notice of Intent (NOI) to prepare an environmental impact statement (EIS) that would analyze amendments to the NWFP. In that letter we outlined and emphasized the devastating impacts of the NWFP on timber dependent rural communities across the northwest since its inception in 1994. These impacts were partly a function of flaws in the standards and guidelines included in the NWFP as well as unclear objectives for the Matrix land use allocation (LUA), which was intended to provide a sustainable and reliable supply of timber to support those rural communities. The current opportunity to address these flaws through the proposed Amendment is immense. Unfortunately, the proposed Amendment, as described in the DEIS, fails to address the full range of obstacles needed to deliver necessary and meaningful change to the management of our National Forests and the communities they support.

In our comments in response to the NOI, we identified the obstacles in the NWFP that have and will continue to inhibit the attainment of the desired ecological and social conditions identified in the 1994 plan. Those conditions are still relevant today. The most significant obstacles we identified to achieving the stated goals of the Amendment were not addressed in the DEIS. We are taking this opportunity to implore you to reconsider our suggestions and proposed amendments. **Without addressing the fundamental flaws of the NWFP in this Amendment, the Forest Service is missing an opportunity – maybe the only opportunity in the foreseeable future – to modernize the NWFP to address the 21<sup>st</sup> Century challenges and**

**threats to our National Forests and the communities, workforces, and businesses that depend on their health, resiliency, and sustainability.**

## **OVERVIEW**

The NWFP limited the land base suitable for timber production to less than 15% of the plan's footprint. This 15% constitutes what is referred to as the Matrix LUA. It has been well documented that the timber levels promised on this LUA were never attained.<sup>1</sup> The proposed Amendment includes components that will reduce this land base further. Although the Amendment does not physically alter LUAs, it does include new desired conditions, standards, and guidelines that effectively transition *over 1.3 million acres of "moist" Matrix lands to quasi-late successional reserve (LSR)*. That represents over half of the existing moist Matrix LUA. In particular, the two desired conditions listed below represent a major change in LUAs without physically changing LUAs:

- FORSTW-MTX-MOI-DC-01 establishes a desired condition for 515,000 acres of moist Matrix that "generally have the major attributes of live old growth trees" and other old growth forest attributes. This desired condition is identical to the desired condition for LSRs.
- FORSTW-MTX-MOI-DC-02 establishes a desired condition for 798,000 acres of moist Matrix that "supports the recruitment of future old growth forests." This desired condition is also identical to the desired condition for LSRs.

The proposed Amendment also creates desired conditions for the "dry" Matrix LUA that complicate the ability for those lands to provide a long-term sustainable supply of timber products. Those desired conditions emphasize old forest structure "maintenance" described as *the presence of large trees and the absence of smaller trees in their vicinity*. Although the Amendment emphasizes increased density reduction treatments on dry forests in a manner that will provide timber products, that provision will be finite as the Amendment also stresses the introduction of prescribed fire following density reduction treatments to maintain open conditions and limit the regrowth of young trees. While such a management paradigm has merit in the context of hazardous fuels reduction, it also represents a forest management outlook that is static rather than cyclical—managers would implement a single timber harvest followed by an attempt to "pause" the resulting forest condition through routine entries using fire or non-commercial treatments.

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<sup>1</sup> Grinspoon, E.; Jaworski, D; Phillips, R. 2015. *Northwest Forest Plan—The First 20 Years [1994-2013]: Socioeconomic Status and Trends. Report FS/R6/PNW/2015/0006*. Portland, OR: U.S. Department of Agriculture, Forest Service, Pacific Northwest Region.

Therefore, if adopted, this Amendment would leave only 1 million acres of the NWFP land base available for sustainable timber management; that's approximately 5% of the 19.7 million acres managed by the Forest Service. How does the Forest Service explain consistency of the Proposed Action to limit active forest management and sustained-yield timber harvests to 5% of the Federal land base in the Pacific Northwest with the President's March 1, 2025 EO? The Agency must rationalize this obvious contradiction.

These proposals constitute a *major concession* to AFRC and its members, with real world consequences to loggers, counties, and the remaining milling infrastructure. An amendment that includes such a concession must be paired with amendment components that:

1. Provide explicitly clear direction on the focus of management on that remaining 5%
2. Remove existing obstacles that will inhibit the ability to effectively manage across all LUAs
3. Update existing plan components related to the Aquatic Conservation Strategy (ACS) to reflect current science
4. Modify directives for young LSR stands to compensate for the transition of Matrix lands to quasi-LSRs

We believe these modifications are supported by the best available science and are essential to attaining both the socioeconomic and ecological desired end results laid out in the Amendment. We also believe that the Forest Service has the ability to pursue these modifications through the current amendment process.

## **PROPOSALS**

### *Survey and Manage*

**None of the accelerated and expanded treatments outlined in the Amendment to improve ecological integrity and resilience to disturbance in dry or moist forests – including attainment of the estimated timber volume outcomes – is achievable with the existing Survey and Manage standards.** In particular, retaining the red tree vole as a category C species on the Survey and Manage list will render the new standards and guidelines in Oregon irrelevant.

If there remains any doubt about the ability for the Forest Service to implement the treatments outlined in the proposed Amendment on both moist and dry forests while maintaining the survey and manage standards, we urge the Forest Service to review and consider two projects in western Oregon. Both projects aimed to implement forest health treatments through density reduction

and dry forest restoration. Forest Service staff realized early in the planning process that these treatments were unimplementable under the existing Survey and Manage standards and the associated protocols for red tree vole management.

Currently there are only two pathways for the Forest Service to circumvent the Survey and Manage protocols for the red tree vole: high priority site designation and non-high priority site designation.<sup>2</sup> Both approaches are similar in that they provide for long term red tree vole habitat management in selected stands while allowing active forest management to occur without adherence to the Survey and Manage standards in other stands.

The first use of this tool was on a project called Calapooya Divide on the Umpqua National Forest.<sup>3</sup> The other was on a project called Upper Briggs Creek on the Rogue River-Siskiyou National Forest.<sup>4</sup> The objectives for these projects included the following:

- Maintain and restore structural and vegetation diversity;
- Conserve and enhance habitat for the northern spotted owl and other wildlife species;
- Strategically manage fuels to reduce the risk of large stand-replacing fires and reintroduce controlled fire use to the landscape;
- Improve stand growth, health, and diversity; and
- Improve fire resiliency and create opportunities to manage wildfires that threaten values at risk

Both projects were ultimately approved and implemented. However, this implementation, and attainment of the objectives listed above, would not have been feasible without circumventing the Survey and Manage standards for the red tree vole.

Our NOI comments provided the background to this standard and supporting documentation for its removal. Rather than repeating those comments again, we incorporate them here by reference. We also remind the Forest Service that the 350 species included in the Survey and Manage standards were believed to be associated with late successional forest and their inclusion in that standard in 1994 was due to uncertainty whether the vast network of LSRs and riparian reserves would be sufficient to provide persistence for those species. That vast network is expanding under this Amendment. The Amendment is proposing management consistent with

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<sup>2</sup> Huff, Rob. USDI Bureau of Land Management, USDA Forest Service. *High Priority Site Recommendations for the Red Tree Vole, Version 1.0*. 2016. Available at: [Red tree vole high priority site management recommendation](#)

<sup>3</sup> U.S. Forest Service, Cottage Grove Ranger District, Umpqua National Forest. *Proposals for Non-High Priority Site Designations for the Red Tree Vole in the Row River Watershed*. 2015. Available at: [Umpqua National Forest - Home](#)

<sup>4</sup> U.S. Forest Service, Rogue River-Siskiyou National Forest. *Red Tree Vole Conservation Plan Briggs Creek Fifth-field Watershed*. 2019. Available at: [Rogue River-Siskiyou National Forest - Home](#)

LSR objectives on all moist forest stands in the Matrix LUA over the age of 120. The Amendment is proposing to manage all dry forests consistent with the principles of ecological restoration to promote and maintain old forest structure.

Adopting these sweeping modifications related to late seral forest protection on Matrix lands into the Amendment while maintaining the Survey and Manage standard protecting late seral forest wildlife species is illogical, unnecessary, unscientific, and counter to achieving the stated goals of the Amendment. The Forest Service has an opportunity to address this outdated standard through the proposed Amendment.

Notably, Alternative D considers an “exemption” to the Survey and Manage standards for “hazardous fuels reduction treatments adjacent to communities.” Presumably, this exemption stemmed from the Forest Service’s acknowledgement of the conflict between adherence to the Survey and Manage standards and the attainment of desired end results following forest health treatments.

Why limit this exemption to areas adjacent to communities? If Survey and Manage inhibits the agency’s ability to effectively implement forest health and hazardous fuels treatments, as it is acknowledging by including this provision in Alternative D, why not expand this exemption further?

We propose that the Forest Service consider such an expansion if the agency is unwilling to remove these standards altogether. At minimum, the Amendment should expand this exemption to all dry forests and young moist forests in the Matrix LUA. Without this addition, the Amendment will fail to meet its objectives, including achieving its estimated timber production and socio-economic outcomes. Failing the forested and rural communities surrounded by National Forests in the Pacific Northwest cannot be an option or outcome of this Amendment.

### *Matrix directives*

The NWFP failed to provide land managers with clear desired conditions and objectives for the Matrix LUA. While LUAs such as LSR had explicit objectives and firm standards, Matrix was effectively characterized as “other.” This omission is partly to blame for the failures of the NWFP on delivering its timber output expectations. After 30 years of implementation, most land managers treat their Matrix LUA identically to how they treat LSR. For example, the Upper Briggs Project included the treatment of 1,796 acres of Matrix land. The Purpose and Need component relevant to vegetation management included the focal objective of “accelerating

development of later seral forest structure.” (EA, p. 9)<sup>5</sup>. The word timber did not appear in the Purpose and Need statement.

**If the Forest Service truly wants to change how the Matrix LUA is managed, the Amendment must include directives that are explicitly tiered to timber management.** This starts with the desired condition and extends to the objectives, standards, and guidelines. The directives related to the Matrix LUA in the proposed alternative as currently written fall short of this need. If left unchanged, land managers will likely continue to manage their Matrix lands as though they are LSRs.

The desired condition for the “young” moist Matrix lands (the only remaining land base where sustainable timber management would be permitted) reads as follows:

*Young forest stands support a predictable supply of timber, non-timber products, and other economic opportunities to support long-term sustainability of communities.*

“Predictability” in and of itself does not address a sustainable supply of timber nor does it address the needs of the wood products sector and the rural communities it helps support. A Forest Service unit could “predictably” offer 100 MMBF of timber annually. It could also “predictably” offer 5 MMBF annually. Furthermore, “predictability” does not address sustainability. The management paradigm applied universally across the Matrix LUA since the inception of the NWFP has been limited to treatments that are *unsustainable*. That management paradigm is one-dimensional, consisting entirely of intermediate thinning treatments that will eventually be exhausted. This is an ecological fact that is well known and accepted by practicing foresters and academics alike.

The proposed Amendment must address this reality through new Matrix directives. The table below includes directives currently proposed in the DEIS for the proposed action and amended versions of those directives that are necessary to attain a robust and sustainable supply of timber on the remaining 1 million acres of young moist Matrix. Again, without these clarifications, the Amendment will fail to meet its objectives, including achieving its estimated timber production and socio-economic outcomes.

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<sup>5</sup> Upper Briggs Landscape Restoration EA, available at [Rogue River-Siskiyou National Forest - Home](#)

|  | DEIS  | AFRC Proposed  |
|--|---|--|
| Young Moist Matrix <b><i>Desired Condition</i></b> | Young forest stands support a predictable supply of timber, non-timber products, and other economic opportunities to support long-term sustainability of communities.   | Young forest stands are managed based on the principles of even-aged sustainable timber production, guided by ecological forestry principles through a combination of regeneration harvest and intermediate thinning, to support economic stability of rural communities.  |
| Young Moist Matrix <b><i>Objective</i></b>         | Within 10 years of amendment approval, treat at least one tenth (65,000 to 81,000 acres per decade) of young stands in moist forest Matrix lands across the Plan area, not including any additional acres of salvage treatments that may occur, by using ecological forestry methods, to bolster timber production while also conserving and retaining older trees and achieving other desired conditions | Within 10 years of amendment approval, apply regeneration harvest treatments to at least 10% (100,000 acres per decade) of stands in young moist forest Matrix lands across the Plan area, not including any additional acres of salvage treatments that may occur, by using ecological forestry methods, to attain the <b><i>Desired Condition.</i></b> |
|  |   | Within 10 years of amendment approval, apply intermediate harvest treatments to at least 10% (100,000 acres per decade) of stands in young moist forest Matrix lands across the Plan area by using ecological forestry methods, to attain the <b><i>Desired Condition.</i></b>   |
| Young Moist Matrix <b><i>Standard</i></b>          | None  | Stands identified under the amendment as Young Forest shall be treated with regeneration harvest no later than age 130.  |
| Young Moist Matrix <b><i>Guideline</i></b>         |   | Within one year of amendment approval, each Unit shall develop a 10-year harvest plan that illustrates how the aforementioned Objectives will be attained.   |

### *LSR Plantation Management*

The Forest Service has demonstrated the ability to significantly modify management paradigms without technically changing LUAs with the transition of over 1.3 million acres of moist Matrix land to LSR through new desired conditions, standards, and guidelines. If such drastic changes can be accomplished without “changing lines on the map” for one LUA, then certainly the same can be done for other LUAs.



To account for those 1.3 million acres administratively proposed to be transitioned from Matrix lands to LSRs, we propose new desired conditions, standards, and guidelines for young moist LSR stands; in particular, for those stands in the LSR that were previously clearcut, regardless of their age or year of origin. For example, the following types of new directives could be adopted to diversify the LSR system in an ecologically focused manner while also compensating for the loss of the 1.3 million acres of moist Matrix forests to LSR objectives.

- A ***desired condition*** that naturally regenerated forests in moist LSRs are managed to provide late-seral forest habitat, while previously clearcut plantation forests in moist LSRs are to be managed for ecological health.
- An ***objective*** that 5% of previously clearcut plantations in each mapped LSR be transitioned to quality early seral forest habitat, consistent with the principles of ecological forestry, in the first decade of implementation.

Furthermore, we believe that young plantation stands in the dry LSR would also benefit from modified desired conditions, standards, and guidelines. Many of those stands are currently comprised of a uniform species mix that is unlikely to develop into a late-seral stand of desirable attributes on these dry forest sites under the status quo style of management. That status quo consists of thinning from below to a density level that maintains canopy cover levels believed to represent a “maintenance” of northern spotted owl dispersal habitat (i.e. 40%). Reestablishment of an appropriate species mix in plantation stands requires treatments that deviate from this standard prescription. While we do not believe that existing directives prohibit such treatments, we do believe that new, clearer, directives are necessary to spark a change in the status quo style of plantation management in the dry LSR.

We propose the following new guideline for young plantation stands in the dry LSR: *to effectively attain desired late-seral habitat structure in young plantations in dry LSRs, favor treatments that aim to reestablish an appropriate species mix through density reduction that removes existing canopy levels down to 20% of the existing stand.*

### *Riparian Reserves*

The riparian reserve network is a foundational component of the ACS. AFRC supports the protection of all water resources through appropriate limitations on activities that may negatively impact those resources. Among those limitations are “buffers” along waterways that restrict vegetation management, including timber harvest designed to attain ACS objectives. These buffers are the foundational component of the riparian reserve network. However, we believe that the buffer widths adopted under the NWFP must be revised to reflect current science.

The NWFP applied two distinct sets of buffer widths: one site potential tree for non-fish bearing streams and two site potential trees for fish bearing streams. The second site potential tree for fish-bearing streams was established in large part to address riparian ecosystem microclimate as illustrated in Figure 3&4-5 in Volume I of the Final Supplemental Environmental Impact Statement (p. 3&4-60).<sup>6</sup>

Research since then has indicated that impacts to microclimate rarely extend beyond one site potential tree height. Most notably, a 2005 study, and the references cited within it, concluded that changes in microclimate occurs within one tree height (15 to 60 m) of the created edge.<sup>7</sup> That study ultimately concluded that “based on the available studies, a one-tree-height buffer on each side of a stream should be reasonably effective in reducing harvesting impacts on both riparian microclimate and stream temperature.”

Given these new scientific findings we believe that the Forest Service must consider dropping the second site potential tree height from riparian reserve buffers on fish bearing streams. It should be noted that the BLM adopted these same modifications (one site potential tree height) for fish bearing streams in their 2016 RMPs under the Obama Administration in consultation with the National Marine Fisheries Service. **The Forest Service must pursue the same modifications in this amendment.**

## **LEGAL CONCERNS**

### *Timber Suitability*

The DEIS notes that “existing timber suitability and PSQ have not been amended.” DEIS at 3-32. However, the amended desired conditions, standards, and guidelines proposed in the DEIS, and the language and direction in both the Planning Rule and the National Forest Management Act (NFMA), show otherwise.

Section 6(k) of the NFMA requires that the Secretary “shall identify lands ... not suitable for timber production.” 16 U.S.C. § 1604(k). Section 219.19 of the Planning Rule defines “timber production” as “the purposeful growing, tending, harvesting, and regeneration of regulated crops of trees to be cut into logs, bolts, or other round sections for industrial or consumer use.” (emphasis added). Section 219.11 of the Planning Rule states that “the responsible official shall

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<sup>6</sup> USDA Forest Service. 1994. Final Supplemental Environmental Impact Statement on Management of Habitat for Late-Successional and Old-Growth Forest Related Species Within the Range of the Northern Spotted Owl. Volume I.

<sup>7</sup> Moore, R. Dan, D. L. Spittlehouse, and Anthony Story, 2005. Riparian Microclimate and Stream Temperature Response to Forest Harvesting: A Review. Journal of the American Water Resources Association (JAWRA) 41(4):813-834.

identify lands within the plan area as not suited for timber production if any one of the following factors applies,” including: “[s]tatute, Executive order, or regulation prohibits timber production on the land” and “[t]imber production would not be compatible with the achievement of desired conditions and objectives established by the plan for those lands.” For lands suitable for timber production, section 219.11(b) requires the inclusion of “plan components, including standards or guidelines, to guide timber harvest for timber production or for other multiple use purposes on such lands.” (emphasis added).

**The proposed Amendment plainly reclassifies lands suitable for timber production.** The proposed Amendment establishes “desired conditions” for “moist” mature and old growth forests and then makes clear that management for the purpose of timber production is inconsistent with those conditions. The desired condition for moist mature forests (FORSTW-MTX-MOI-DC-02) is to *support the recruitment of future old growth forests*. The desired condition for moist old growth forests (FORSTW-MTX-MOI-DC-01) consists of a description of the ecological components of an old growth forest. Standards applying to moist old growth forest (FORSTW-MTX-MOI-STD-01) limit timber harvest to that which limits wildfire risk. Guidelines applying to moist mature forest (FORSTW-MTX-MOI-GDL-01) limit timber harvest that which limits wildfire risk, accelerates the development of old growth habitat, or support habitat for late-successional forest dependent wildlife species.

Clearly, the proposed Amendment prohibits timber production across 515,000 acres of old growth and 798,000 acres of mature forests currently allocated as Matrix land.

Even assuming the proposed Amendment has not reclassified lands as suitable for timber harvesting, it still does not comply with section 219.11(b) of the Planning Rule, which requires the Forest Service to include “standards or guidelines, to guide timber harvest for timber production or for other multiple use purposes on such lands.” (emphasis added). If, as the Forest Service claims, it is not redesignating the suitability of timber for harvesting, it is required to develop standards or guidelines to guide timber production, as defined by the Planning Rule, on those lands it deems suitable. In particular, the Forest Service must develop standards and guidelines that address the purposeful growing, tending, harvesting, and regeneration of lands suitable for timber production, including those lands that contain old-growth forests.

## **ADDITIONAL CONCERNS**

### *Timber Sale Viability and Support for Rural Economies*

A predictable and robust supply of timber products is essential to providing financial support to county governments throughout the Pacific Northwest. This funding level is not only a function

of how much timber is sold, but the value of that timber. The DEIS provides a comparison of treatment acres and timber volume between the status quo and the Amendment: 212,000 acres treated and 4,446 MMBF sold (21,000 MBF/acre), and 735,000 acres treated and 9,700 MMBF sold (13,000 MBF/acre) respectively. So, while the acres treated in the amendment increase by 247%, the volume sold only increases by 118%.

This indicates lower volume per acre and, therefore, a diminished monetary value that is critical to maintain rural county services. We urge the Forest Service to revisit these calculations and the assumptions behind their results.

This discrepancy also raises concerns about the economic viability of future timber sales and the substance of the active forest management program in general. Timber sales under the status quo are often marginally viable due to low volume per acre, high road costs, and operating restrictions that complicate effective and timely implementation. The DEIS suggests a future landscape comprised of *more* harvest across *more* acres at *higher* intensity. Yet the data on acres treated and volume generated suggest the contrary.

#### *Wildfire Management*

The use of prescribed fire outside of the fire season is an effective tool for managing hazardous fuels. However, the practice of “managing” wildfires during the fire season is reckless, unacceptable, and unnecessary. It puts lives, property, public health, public safety, our air, drinking water, private landowners, cultural values, and environmental resources at risk. The proposed amendment includes new objectives that explicitly identify the use of “unplanned” ignitions to attain desired forest conditions across the landscape.

FIRE-ALL-OBJ-02-C/D established acreage treatment goals using fire, including “unplanned ignitions.”

We strongly object. This directive is extremely concerning, particularly to those who live and work in communities adjacent to National Forest System (NFS) land. In this Amendment, the Forest Service should explicitly adopt a policy to aggressively suppress all wildfires, regardless of land use allocations, during the wildfire season to protect public health, safety, and communities.

#### *Timber Salvage*

Directives on timber salvage following disturbance should be strengthened. While the proposed Amendment includes new prohibitions on salvage in LSRs it fails to include new *requirements*

for salvage in the Matrix. Currently, the NWFP “allows” timber salvage. However, this allowance is clearly insufficient in effectively implementing salvage across the Matrix LUA following disturbance.

The 2020 Labor Day fires burnt almost 350,000 acres of NFS land in western Oregon consuming approximately 5.3 billion board feet of timber.<sup>8</sup> The affected National Forests recovered approximately 72 million board feet of that damaged timber. That represents 1.36% of the total volume damaged. This is an alarming data point that warrants change.

The failure to conduct salvage is a function of factors beyond the NWFP. However, establishing new standards and guidelines that clearly direct the agency to prioritize timber salvage on Matrix lands would be beneficial in attaining appropriate management following disturbance.

#### *Adaptive Management Areas (AMA)*

The proposed Amendment is unclear on the future management of AMAs. The original vision for the AMAs, testing new techniques for active forest management, was never fully realized. The Amendment should clearly transition the AMAs to the Matrix LUA where their primary management objective would be timber production. This is another opportunity to partially “offset” the loss of Matrix lands that would be managed as quasi LSRs and not made available for timber production under the Amendment.

#### *Tribal Engagement*

Thirty years ago, when the NWFP was created, the Forest Service failed to meaningfully engage Tribes and consider Indigenous Knowledge. As such, those values and perspectives were excluded from the analysis and the final amendment. These shortcomings must be addressed and corrected in any final agency action. We support the Tribal recommendations and believe Tribal involvement, engagement, and partnership is essential to accelerating and expanding active forest management.

### **CONCLUSION**

AFRC is committed to working with the Forest Service to modernize the NWFP in a meaningful way that improves forest health, fire resiliency, protects communities, and increases timber supply to support local milling infrastructure and the stewards of our public lands. While there

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<sup>8</sup> Rasmussen, Mark, et al. Economic Impacts to Oregon’s Forest Sector, 2020 Labor Day Fires. Oregon Forest Resource Institute. June 2021.

are components in the DEIS that aim to advance those improvements, the Amendment's alternatives do not adequately address the challenges and obstacles the Forest Service faces on the ground.

This is our moment to reflect on the intellectual premises, public misconceptions, and implementation mistakes of the past 30 years. We have the science, information, and practical experience to modernize our approach to forest management for the benefit of all and to meet the challenges of the 21<sup>st</sup> Century. Instead of limiting this unique opportunity to anarrow amendment based on a 20<sup>th</sup> Century paradigm, the Forest Service should expand its scope and build on the collaborative work of the Federal Advisory Committee by continuing to work with diverse constituencies to take the necessary and appropriate steps to truly modernize and reform the NWFP to meet the socio-economic needs and environmental challenges of the 21<sup>st</sup> Century.

Sincerely,

A handwritten signature in black ink, appearing to read "Travis Joseph". The signature is written in a cursive, flowing style with a large initial "T".

Travis Joseph  
President