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March 17, 2025

Jacque Buchanan
Regional Forester, Pacific Northwest Region
USDA Forest Service
333 SW First Avenue
Portland, Oregon 97204

Subject: Comments on the Draft Environmental Impact Statement (DEIS) for the Northwest Forest Plan Amendment

Dear Ms. Buchanan,

Introduction

The Oregon Society of American Foresters (OSAF) appreciates the opportunity to provide comments on the Draft Environmental Impact Statement (DEIS) for the Northwest Forest Plan (NWFP) Amendment, released in November 2024. OSAF is the largest state affiliate of the Society of American Foresters (SAF) and has long championed sustainable, science-based forestry practices throughout Oregon. Central to SAF's mission is the responsibility to anticipate, identify, and define opportunities, problems, and issues related to forest resources. Our mission is to support and represent the forestry profession by advancing the science, education, technology, and practice of forestry.

With approximately 700 members—including field foresters, researchers, administrators, and educators working in federal, state, and local government, universities, private landownership, the timber industry, non-profits, trade associations, and more. This diverse community brings together practical experience and advanced knowledge in areas such as wildfire resilience, climate change adaptation, sustainable harvesting, and ecosystem conservation. Collectively, our professionals ensure that OSAF's perspectives are rooted in science-based best practices and are well-equipped to address the multifaceted challenges facing Oregon's forests.

OSAF pledges that its professional views and input will be consistent with the SAF mission to:

- Advance the science, education, technology, and practice of forestry;
- Enhance the competency of its members and establish professional excellence; and
- Use the knowledge, skills, and conservation ethic of the profession to ensure the continued health and use of forest ecosystems, as well as the present and future availability of forest resources to benefit society.

For more information on Oregon and National SAF position statements, please visit https://forestry.org/oregon-position-statements/

Background

Over the past two to three decades, severe wildfires and insect outbreaks have emerged as the greatest threats to forests in the Pacific Northwest, according to the agency's Mature and Old Growth Threat Analysis[1]. Climate modeling indicates a future with hotter, drier summers and longer fire seasons, suggesting an increased frequency and severity of wildfires and expanding insect related mortality.

[1] https://www.usda.gov/about-usda/news/press-releases/2024/06/20/usda-forest-service-seeks-public-comment-draft-guidance-old-growth-management-national-forests

Consequently, we believe the U.S. Forest Service's (USFS) most critical action is to manage our forests in ways that enhance their resistance and resilience to wildfire and insects—ultimately determining whether they continue delivering essential values such as carbon sequestration, habitat, timber, and recreation for future generations, or convert to other land cover types and lose those benefits.

OSAF concludes that the current framework of the NWFP Amendment is overly restrictive. Rather than merely adjusting the range of management practices permitted within its narrow boundaries, we contend that the amendment itself should be vacated and its spatial parameters fundamentally reexamined. The "box" within which the Federal Advisory Committee (FAC) was forced to operate is too constraining—its boundaries do not reflect the ecological realities or management needs of the region.

Instead of allowing limited modifications in management actions (as proposed in Alternatives B, C, and D), the lines on the map must be redrawn to provide a framework that enables robust, active forest management across diverse ecosystems[2]. This change is essential to fulfill the USFS mission and uphold the principles of the National Forest Management Act of 1976, ensuring that forest stewardship, wildfire resilience, climate adaptation, and sustainable economic opportunity are fully achievable.

In short, we believe that without redefining the spatial limits of the amendment, any adjustments to the management guidelines will be insufficient to address the broad-scale challenges facing our forests.

However, the FAC recommendations and the NWFP Amendment process was not all in vain. OSAF encourages evaluating all plan components through the lens of whether they "facilitate the creation and maintenance of forest ecosystems that are resilient to all forms of disturbance and will persist for future generations." We are concerned that several proposed standards and guidelines within this Amendment may impede efforts to maintain and improve the health and resilience of our federal forests.

Our detailed comments are organized around the same categories identified in the DEIS:

1. Tribal Inclusion
2. Forest Stewardship
3. Wildfire Resilience
4. Climate & Ecosystem Integrity and Carbon
5. Supporting Economic Opportunity

Tribal Inclusion

The NWFP Amendment or other such revision provides a critical opportunity to enhance tribal inclusion by integrating Indigenous Knowledge and ensuring that tribal rights and perspectives are fully respected in forest management. OSAF recognizes that tribal communities have stewarded these lands for generations and possess invaluable traditional ecological knowledge that can guide adaptive management practices. We acknowledge that tribes have enumerated and unenumerated rights on federal lands and that federal forest management can benefit from the consideration of Indigenous Knowledge. We also acknowledge that the Tribes had limited input into the 1994 NWFP. At the same time, the USFS should not set unreasonable expectations for Tribes' participation in land management planning beyond what current federal law and treaties state.

Alternative D calls for the "co-development of actions in priority watersheds" at a rate of 3000 acres every 3 years. We support this objective because this work is desperately needed (TRIBAL-BIO-OBJ).

[2] https://forestry.org/wp-content/uploads/2025/02/OSAF-Active-Mgmt-To-Achieve-Maintain-Healthy-Forests-2024-Position-Statement.pdf

If the success of Good Neighbor Authority is any indication of what might be accomplished, there may be the potential for this to be an even larger acreage.

We recommend that the amendment:

- **Establish Clear Participation Protocols:** Define when and how tribal input is required—whether at the project level, landscape scale, or both—to ensure meaningful and consistent involvement.
- **Develop Co-Stewardship Agreements:** Create frameworks that support tribal-led initiatives and workforce development, and address cultural, ecological, and economic opportunities.
- **Recognize and Integrate Indigenous Knowledge:** Incorporate traditional practices and ecological insights into forest management planning to enhance resilience against wildfires and climate impacts.
- **Ensure Transparency and Legal Consistency:** Align tribal consultation processes with federal law and existing treaties, ensuring that expectations and roles are clearly communicated and legally supported.

By embedding these principles, actions to improve the NWFP can serve as a model for collaborative, cross-boundary management that improves forest health and upholds the cultural and legal rights of Indigenous communities.

Forest Stewardship

The DEIS for the NWFP Amendment lacks clear, comprehensive tables and visuals that provide an overall assessment of land use allocations (LUAs), projected timber volume, and treatment acreage across different forest types. This lack of transparency makes it difficult for the public, stakeholders, and policymakers to understand the full scope of changes and their long-term implications.

Acreage and Volume Tables Are Incomplete and Difficult to Interpret

The amendment must provide clearer, better-organized summary tables and pie charts that explicitly detail:

- **Acreage by LUA** (e.g., Matrix, LSRs, AMAs, Riparian Reserves)
- **Projected volume yield by LUA**
- **Breakdown of Moist vs. Dry Forest treatment areas**

Currently, the DEIS lacks a big-picture, high-level summary of acres and volumes by LUA. This omission makes it nearly impossible to assess the impact of the amendment on timber availability. The 1994 NWFP Standards and Guidelines document (page A-4) included a simple, effective table that clearly defined acreage across each LUA. No such table exists in this amendment, leaving a significant gap in public understanding.

While Tables 3-4, 3-5, 3-6, and 3-7 attempt to show treatment projections, they fail to present the complete picture in one place.

Need for a Side-by-Side Comparison of Volume by LUA

The amendment should include a table that not only displays acres per LUA but also side-by-side projections of how much timber volume is expected to come from each LUA.

For example, Table 3-7 states that only 65,000 – 81,000 acres of Moist Matrix are projected for harvesting per decade, equating to just 6,500–8,100 acres per year. This appears to be an extremely low amount of Moist Matrix treatment in what is supposed to be the most productive LUA. The table does not make it clear where the rest of the projected volume will come from.

In contrast, Table 3-7 also states that 523,000 - 634,000 acres per decade will be treated in the Dry Forest land base under Alternative B. This means that almost six times as much acreage is proposed for treatment in Dry Forests compared to Moist Forests. The amendment must provide an analysis of what impact this disparity will have on the forest products industry, considering that Dry Forests do not produce the same high-value timber as Moist Forests.

Misleading Classification of 1.3 Million Acres of Moist Matrix

Table 3-4 states that 1,313,000 acres of previously unrestricted 1994 Matrix lands will still be classified as "Matrix" but with additional harvest constraints due to stand age. These acres are now subject to the same restrictions as Late Successional Reserves (LSRs) based on new age thresholds (80-120 years).

While the amendment claims that LUA boundaries remain unchanged, the reality is that Matrix land is functionally shrinking due to these new restrictions. It is misleading to report these 1.3 million acres as still being "Matrix" when in practice, they will operate under restrictive guidelines nearly identical to LSRs. The recommended acreage table should reflect this shift to ensure transparency.

Additionally, if these older Matrix stands were already highly litigated and protested under the original NWFP, how does the Forest Service justify assuming that volume from these stands will be realized under this amendment? The DEIS does not address the reliability of projected volume estimates from these areas, which have historically been tied up in litigation.

Long-Term Sustainable Harvest Base Is Shrinking

The amendment sets strict age-based restrictions on harvesting, with a complete prohibition on harvesting stands older than 200 years (pre-1825), except for limited tribal use or wildfire risk reduction.

However, there is no analysis of the long-term implications of continually reserving older stands. Over time, stands will continue to age, shifting more and more acres into restricted categories, further reducing the sustainable timber base.

To account for the net loss of sustainable harvest acres, the USFS should explore opportunities to transition some LUAs into the Matrix to compensate for reductions. Options include:

- Moist AMA (206,000 acres)
- Moist AMA Riparian Reserve (104,000 acres)
- Moist Matrix Riparian Reserve (329,000 acres)
- Dry AMA (80,000 acres)
- Dry AMA Riparian Reserve (35,000 acres)
- Dry Matrix Riparian Reserve (92,000 acres)

If the agency continues to reserve more land without replenishing the harvestable base, the long-term sustainability of timber management under the NWFP will become impossible. The OSAF Position Statement on Thinning on Public Lands[3] in Oregon states, "We support the use of thinning as a management tool on public lands in forests of all ages because it can effectively: reduce tree stress, increase forest health and vigor, reduce hazardous fuels, create unique forest structures that enhance biodiversity and wildlife and fish habitat, and provide useful products and public revenues."

Restrictions on Dry Forest Management Will Reduce Sustainable Timber Production

We agree with the intent to expand active management, including understory thinning, biomass utilization, and prescribed fire in Dry Forests. However, the long-term sustainability of timber

[3] https://forestry.org/wp-content/uploads/2021/10/Thinning-position-2019-rev.pdf

production in Dry Forests will be negatively impacted by rigid age restrictions and a narrow focus on removing only smaller trees.

For Dry Forests to be managed successfully under an uneven-aged silvicultural system, managers must be allowed to remove a mix of tree sizes and ages, including some older trees when necessary. The requirement to protect all trees older than 150 years will reduce the sustainable harvest base over time.

Additionally, if the only trees allowed to be harvested are smaller understory trees, then future timber supply will be severely limited. The Forest Service must ensure that all age classes are retained in these forests, not just the oldest trees.

Accurately Identifying Individual Tree Ages Is Impractical

The amendment now requires the USFS to identify the age of individual trees to determine which trees must be retained. However, the agency has provided no clear protocol for how this will be achieved.

Tree age is influenced by a variety of factors, including geographic location, climate, soil conditions, competition, and past management history. Tree diameter, bark texture, and structure vary widely, making field identification of tree age inherently subjective and unreliable. Additionally, our Position Statement on Thinning on Public Lands in Oregon[4] states, "Research and management experience do not support the use of inflexible, arbitrarily prescriptive restrictions on thinning, such as fixed age or diameter limits."

The Forest Service must recognize that some older trees will inevitably be removed during operations, whether due to logging corridors, hazard tree removal, or errors in age identification. The amendment must allow for flexibility in guidelines rather than imposing strict, unenforceable age-based restrictions.

<u>Recommendation: Use a More Practical Retention Standard</u>

Instead of an arbitrary age threshold for tree retention, the Forest Service should adopt a more flexible standard such as:

- Retaining a minimum number of large trees per acre (e.g., five or more of the largest trees per acre)
- Requiring a minimum basal area retention threshold (e.g., 20 square feet per acre of large trees)

The 2003 Healthy Forest Restoration Act used a similar approach, directing the retention of "large trees contributing to old-growth structure" rather than enforcing a strict age cutoff. A similar framework should be applied in this amendment to balance forest health and timber sustainability.

Survey and Manage: A Barrier to Effective Forest Management

We are disappointed that the Forest Service did not take this opportunity to sunset the Survey and Manage (S&M) requirements, as they remain one of the most significant obstacles to achieving the goals and objectives of the NWFP amendment.

S&M places unnecessary restrictions on treatment acreage, increases costs, delays projects, and, in many cases, renders management efforts infeasible. These surveys often fragment treatment units, reduce logging feasibility, and shrink the total area available for active management. In some cases, they lead to complete project cancellations.

Many of the species protected under S&M are abundant and thrive in Late-Successional Reserves (LSRs), which already provide millions of acres of permanent habitat protections. Given that over 80

[4] https://forestry.org/wp-content/uploads/2021/10/Thinning-position-2019-rev.pdf

percent of federal forest lands are within reserves where harvesting is prohibited or restricted, it is unnecessary to impose additional S&M requirements across the landscape, particularly in Matrix lands.

Additionally, the S&M program appears to exceed the scope of the Endangered Species Act, contradicting the DEIS's stated goals across all alternatives. The FIRE-ALL-GDL-06-D guideline already allows for a 0.25-mile buffer exemption, yet the Forest Service has refused to reconsider broader reforms. We strongly recommend expanding this exemption to a five-mile buffer around communities to facilitate fuels reduction projects and better protect against wind-driven wildfires.

Since its implementation in 2001, the S&M program has collected over 25 years of data on species locations and abundance. However, the amendment fails to provide any discussion on how S&M restrictions have impacted Matrix lands or how many acres have been placed off-limits due to species protections. Without this transparency, the cumulative effect of S&M on timber availability remains unknown.

- How many acres of Matrix lands have been lost to S&M-related restrictions?
- What are the projected future impacts on Matrix lands based on species distribution data?
- How does S&M affect wildfire and insect resilience treatments, particularly in Dry Forests where fuel reduction is critical?

These are fundamental questions that the amendment must address. Given the significant reserve land base already in place, it is time for the Forest Service to eliminate pre-disturbance S&M surveys and subsequent protection requirements on Matrix lands, allowing active management to proceed unimpeded.

Northern Spotted Owl (NSO) Habitat: A Needed Shift in Management Approach

We find the following provision in Alternative D to be a practical and science-based approach to NSO habitat management and suggest it be given serious consideration:

"Rather than trying to maintain the northern spotted owl habitat levels identified in the 1994 NWFP, which may have been artificially high due to fire suppression and may not be sustainable, the amount of northern spotted owl habitat would be targeted to the range of historic conditions for the vegetation types in each of the dry forest LSRs."

This statement acknowledges that historical fire suppression has resulted in an unnatural expansion of NSO habitat in Dry Forests, increasing the risk of high-severity wildfire. However, the amendment fails to provide a detailed analysis of how this shift in management would impact acreage allocations, timber volume availability, and long-term restrictions.

The Forest Service must clearly outline:

- How many acres of NSO habitat are currently above historic levels due to fire suppression?
- How many acres would be adjusted under this new approach in Alternative D?
- What impact would this have on management flexibility, timber production, and wildfire resilience?

If the agency intends to recalibrate NSO habitat targets to align with natural disturbance patterns, it must provide a transparent assessment of what that means for land management, rather than leaving stakeholders guessing.

Late-Successional Reserve Oversight and Regional Ecosystem Office Approval
We appreciate that Alternative D modifies the approval authority for treatments in LSRs, transferring decision-making to individual national forests rather than requiring oversight from the Regional Ecosystem Office (REO).

The original review process, established in the mid-1990s, was excessively bureaucratic and slow, often taking years to complete before any action could be taken. In the face of climate change, increased wildfire activity, and declining forest health, this level of delay is no longer acceptable.

While revisions to account for contemporary challenges are warranted, continuing to involve the REO in every project will only perpetuate the same inefficiencies that have hindered active management for decades. Assigning preparation and approval authority to individual forest supervisors, as provided in FORSTW-LSR-PMA-D, is a reasonable and necessary change. We fully support this shift, as it will allow for more responsive, science-based decision-making at the local level.

Wildfire Resilience

We agree that the amendment must include clear ecological treatment acreage targets for both dry and wet forests. However, given the increasing risks of wildfire, drought, and insect infestations, we recommend adopting the most ambitious targets possible to accelerate forest restoration efforts.

The current rate of forest loss due to severe wildfires and insect outbreaks far exceeds the pace of restoration treatments. Without aggressive action, our national forests will continue to deteriorate, increasing the risks to both ecosystems and human communities.

Additionally, in Dry Forests, the proposed 150-year or 175-year restriction on individual tree removal must be flexible enough to allow for the treatment of overstocked stands dominated by non-fire-adapted species. Many Dry Forests are already in a state of ecological imbalance, with excessive fuel loads that increase fire severity and reduce landscape resilience.

The Forest Service must set aggressive treatment targets and ensure that regulatory restrictions—such as age-based harvesting limits—do not undermine the ability to meet these goals.

Resilient Forests Require Active Management, Regardless of Age
While the amendment emphasizes the preservation of old-growth and multi-canopy forests, it fails to recognize that these forests are still vulnerable to catastrophic wildfire, windstorms, disease, and insect outbreaks.

For example, the 2020 Labor Day fires destroyed thousands of acres of late-successional and old-growth forest, proving that passive management does not equate to long-term forest resilience. The 1950s Tillamook Burns, the 1962 Columbus Day Storm, Swiss Needle Cast disease outbreaks, and the ongoing Douglas Fir Flatheaded Wood Borer infestations in southern Oregon all demonstrate that natural disturbances will continue to shape these forests, regardless of policy restrictions.

The bottom line is that treatments should not be arbitrarily limited based on tree age. Instead, the Forest Service should focus on building resistance and resilience into all forest stands through thinning, fuels reduction, and targeted harvests—even in older forests. The OSAF Position Statement on Managing Mature and Old-Growth Forests[5] states, "even where non-timber values are primary drivers of management decisions, OSAF believes that active management of mature and old-growth forests may be needed to promote and sustain ecological values over time."

[5] https://forestry.org/wp-content/uploads/2022/03/Managing_Old-growth_2021-Final.pdf

Consideration of Adjoining Private, State, and Tribal Lands

The Forest Service must take into account the proximity of federally managed lands to adjacent private, state, tribal, and BLM-managed forests when developing and implementing management treatments. We appreciate that the proposed amendment acknowledges the importance of protecting developed areas, Community Wildfire Protection Plans, and community protection zones. However, this responsibility should extend beyond residential areas to include all neighboring forestlands that are at risk from wildfire originating on National Forest System (NFS) lands.

The Forest Service must be a responsible neighbor by recognizing that failure to treat fire-prone stands on federal land increases the likelihood of wildfires spreading onto adjacent ownerships, threatening private timberlands, rural communities, and critical infrastructure. Treatments such as thinning, fuels reduction, and salvage must be strategically implemented not only to protect federal lands but also to improve defensibility for adjoining landowners.

To ensure that federal land management does not create unnecessary wildfire risks for neighboring properties, salvage harvest should be explicitly allowed in all LUAs within at least one mile of communities and adjoining state, BLM, and private forestlands. This would help create effective fuel breaks, improve wildfire containment, and reduce overall fire intensity in these high-risk areas. By proactively managing NFS lands that border other ownerships, the Forest Service can strengthen cross-boundary fire resilience, reduce suppression costs, and uphold its responsibility to neighboring landowners and communities.

Managed Wildfire: Too Risky

We strongly oppose the establishment of a 1.75-million-acre-per-decade target for managing wildfire for resource benefit (FIRE-ALL-OBJ-02-B). Setting this type of acreage goal incentivizes passive wildfire management, increasing the risk of stand-replacing fires that threaten adjacent landowners, watersheds, and critical infrastructure.

Instead of taking decisive suppression actions, this policy encourages fire managers to allow wildfires to burn under the justification of "resource benefit," even when they pose serious risks to public and private lands. Expanding this approach would be reckless, leading to greater habitat loss, increased destruction of timber resources, and unnecessary risks to firefighters and communities.

Additionally, prolonged wildfire events raise firefighter exposure hours, increasing risks to personnel who are already stretched thin during peak fire season. The Forest Service routinely describes wildfires as emergencies when engaging with the public, yet this amendment simultaneously promotes policies that delay suppression and prolong fire activity. If the agency is serious about fire management, it must align its policies with its messaging—wildfires should be aggressively suppressed to protect lives, landscapes, and economies.

We also strongly oppose FIRE-ALL-PMA-B, which seeks to expand the use of wildland fire for resource benefit. The Forest Service already allows many wildfires to burn under the pretense of passive management, often with devastating consequences. A formal policy broadening this approach ignores the real-world destruction caused by uncontained wildfires and dismisses the increasing severity of fire seasons across the West.

The Amendment Fails to Differentiate Between Human-Caused and Natural Wildfires

The amendment does not clearly distinguish between human-caused wildfires and those ignited by natural events like lightning. This is a significant oversight, as many of the most destructive fires in recent years have been ignited by powerlines, vehicles, or negligent human activity during the driest, windiest months of the year.

While Figures 3-2 and 3-3 in the DEIS present overall wildfire statistics, they fail to break down:

- The seasonality and ignition sources of large, destructive fires
- How many of these fires originated during extreme wind events
- The disproportionate impact of human-caused fires on communities and adjacent landowners

For example, some of the most destructive wildfires in recent history—including the Paradise Fire (CA), 242 Fire (Chiloquin, OR), Carr Fire (CA), and Eagle Fire (OR)—were all human-caused and ignited under extreme fire weather conditions.

While climate change is often cited as a primary driver of fire severity, the reality is that many of these catastrophic fires occurred because of human ignition during peak fire season, under hot, dry, and windy conditions. The amendment must acknowledge this fact and clearly articulate how the Forest Service plans to manage wildland fires to prevent similar disasters in the future.

Additionally, the Forest Service must be transparent about the risks of managed wildfire. There have been multiple instances where the agency attempted to allow a fire to burn under "favorable conditions," only for wind shifts or unexpected fire behavior to cause it to escape, resulting in widespread destruction. This pattern has eroded public trust and placed additional burdens on state and local firefighting resources.

Prescribed fire and managed wildfire can be effective tools when used under strict control, within specific conditions. However, allowing wildfires to burn for resource benefit should not come at the expense of communities, private landowners, or firefighter safety. The Forest Service must adopt a more aggressive and responsible wildfire suppression strategy.

Opposition to Alternative D's Community Wildfire Protection Zone Definition

We do not support the Wildfire Resistance and Resilience proposal outlined in Alternative D and instead favor the approach presented in Alternative B (FIRE-ALL-PMA-13). The framework in Alternative D is overly complex and fails to account for real wildfire behavior, particularly wind-driven fires.

Alternative D defines Community Wildfire Protection Zones as buffers "directly adjacent to structures" and "of maximum width sufficient to provide low radiant heat from areas of untreated fuels." This narrow definition ignores the reality of embers, spotting, and fast-moving fires driven by high winds, which can spread far beyond treated buffer zones.

Restricting treatment to vegetation immediately next to structures does not give firefighters enough space to effectively protect communities or slow the advance of large fires. Fire science and real-world fire behavior demonstrate that:

- Wind-driven wildfires can send embers miles ahead of the main fire front. A narrow buffer around structures does little to stop these embers from igniting new spot fires.
- Fuel treatments must extend beyond the immediate built environment to be effective. Without expanded treatment areas, suppression resources will struggle to contain wildfires near communities.

By contrast, Alternative B offers a more practical and effective approach by:

- Delineating community protection areas through collaboration with multiple stakeholders, including those involved in Community Wildfire Protection Plans (CWPPs)
- Expanding the scope of defensible space planning to incorporate real-world fire behavior, rather than arbitrary proximity limits

- Providing flexibility for localized decision-making, allowing communities to tailor fire management strategies to their specific landscapes and risks

At a minimum, community protection buffer zones should be expanded to 1-5 miles to account for the risks of wind-driven fires and ember showers. A narrow focus on the area immediately surrounding structures is outdated and does not reflect modern wildfire science.

The Critical Role of Salvage Harvest in Forest Recovery and Resilience

The DEIS outlines salvage harvest policies that vary significantly across alternatives and LUAs. While we appreciate the recognition that salvage harvest has a role to play in forest recovery—particularly in Dry Forest LUAs—we strongly urge the Forest Service to expand salvage opportunities irrespective of stand age, LUA classification, or acreage impacted[6].

Under the 1994 NWFP, salvage harvest was permitted in certain circumstances, yet constant litigation, unclear guidelines, and restrictive interpretations prevented meaningful implementation. The proposed amendment fails to provide the necessary flexibility and certainty to ensure salvage can be effectively used as a tool for ecological restoration, fire hazard reduction, and economic stability for rural communities.

The Forest Service Must Clearly Articulate the Benefits of Salvage Harvest

Salvage harvesting serves multiple critical ecological and economic functions that the NWFP Amendment fails to emphasize adequately. The Forest Service should fully recognize that salvage:

- Sequesters carbon in long-lived wood products, rather than allowing decay and emissions from standing dead trees
- Generates receipts for county governments, supporting schools, roads, and emergency services in rural areas
- Provides funding for site preparation and reforestation, ensuring timely regeneration of burned or disturbed areas
- Sustains logging jobs and supports local milling infrastructure, which is essential for wildfire suppression capacity
- Reduces excessive fuel loads that contribute to dangerous, high-intensity wildfires in subsequent years
- Decreases risks to firefighters by removing hazardous snags that increase the likelihood of reburns

The Forest Service must remove unnecessary salvage restrictions and incorporate clear, science-based guidelines that allow for effective post-disturbance management.

Salvage in Matrix is a Requirement, Not an Option

Salvage harvest in Matrix lands should be mandated to ensure that these lands remain productive for timber management and do not become de facto reserves due to restrictions on post-disturbance recovery efforts. The proposed guidelines under FORSTW-MTX-MOI-GDL-04 introduce vague language about "live trees" and "oldest dead trees," which could lead to overly restrictive interpretations that prevent necessary salvage operations.

1. Clarify Definitions of Live and Dead Trees – Trees that appear "live" immediately after a disturbance event frequently die in the following years due to stress, bark beetle infestations, and other secondary mortality factors. This was evident in the post-fire salvage operations

[6] https://forestry.org/wp-content/uploads/2025/03/Salvage-Harvesting-on-Public-Lands-9.6.24.pdf

following the 2020 Labor Day fires, where seemingly green trees later succumbed to beetle outbreaks. Post-disturbance salvage guidelines must account for this delayed mortality and allow for the removal of trees at risk of dying.

2. Eliminate Restrictions on Salvaging Live Trees in Dry Forests – The DEIS prohibits salvage harvest of live trees in Dry Forest Matrix lands, even when those forests are already overly dense and in need of thinning. Many of these stands burned in part because they needed pre-disturbance thinning. The most efficient, cost-effective approach is to allow for thinning and salvage in a single entry, rather than requiring a separate thinning treatment after salvage has already been conducted. The amendment must allow for concurrent salvage and thinning to maximize efficiency, reduce disturbance, and improve forest resilience.

Salvage in LSRs Should Be Based on Functionality, Not Arbitrary Restrictions

Salvage in LSRs should be guided by whether a stand continues to function as NSO habitat, rather than by arbitrary stand age or acreage limitations.

- If a stand has been severely burned or heavily impacted by insects, salvage should be permitted. Burned-over stands that no longer provide nesting habitat for NSO should not be left untouched, as this only increases the risk of reburns and delays forest recovery.

- If a fire or insect outbreak is of low or moderate severity and the stand still functions as suitable habitat, salvage can be more limited. However, clear guidelines must be established for how "habitat function" is determined, rather than using blanket prohibitions on salvage.

A current example of why these guidelines must be improved is the ongoing Douglas-fir flatheaded woodborer outbreak in Southern Oregon, which is slowly expanding northward. The amendment does not adequately address the role of salvage in managing these insect-killed stands, despite the fact that failing to remove affected trees could lead to further loss of habitat and economic opportunities. The Forest Service must include specific provisions for salvage in insect-impacted forests.

Existing DEIS Language on Salvage in Dry Forests Must Be Strengthened

The DEIS acknowledges that salvage harvest plays a role in fuel management in dry forests, but the proposed restrictions in some alternatives—especially Alternative C—would severely limit the ability to recover timber, reduce fire risk, and promote restoration.

Alternative B allows for salvage in Dry Forest reserves when beneficial to restoration goals, fire resilience, wildlife needs, and local communities. However, it still imposes unnecessary constraints, such as requiring a high number of large snags to be retained. While some retention is appropriate, the Forest Service must ensure that salvage guidelines balance habitat needs with fire risk reduction.

Alternative C is the most restrictive, permitting salvage only for infrastructure protection and along roads. This effectively prevents meaningful post-fire recovery efforts and will lead to increased reburn risk in unmanaged stands.

The Forest Service Must Address Litigation Risks That Have Historically Blocked Salvage

Even when salvage is technically permitted under NWFP guidelines, it has been frequently blocked by lawsuits, appeals, and procedural delays. The Forest Service must take proactive steps to reduce litigation risks and ensure that salvage projects are implemented efficiently.

- Categorical Exclusions (CEs) for post-fire salvage should be expanded to allow for faster project approval.

- Project planning timelines should be shortened to prevent unnecessary delays that reduce the economic viability of salvage operations.
- Clear legal justification for salvage must be included in the Final Environmental Impact Statement (FEIS) to prevent project delays due to legal challenges.

Final Recommendations for Salvage in the NWFP Amendment

1. Remove arbitrary restrictions on salvage based on stand age, LUA, or acreage impacted. Salvage must be permitted wherever a stand no longer provides key ecological functions, regardless of age.
2. Mandate salvage in Matrix lands to ensure these lands remain productive and continue to contribute to sustainable timber supply.
3. Clarify definitions of live and dead trees to ensure that post-disturbance mortality is fully accounted for.
4. Allow thinning and salvage in a single entry to maximize efficiency and minimize unnecessary site disturbance.
5. Expand salvage guidelines in LSRs to be based on habitat functionality rather than blanket prohibitions.
6. Address ongoing insect outbreaks by including explicit salvage provisions for beetle-killed stands, such as those in Southern Oregon.
7. Reduce litigation risks by streamlining approval processes for salvage projects and expanding categorical exclusions.

Climate, Ecosystem Integrity and Carbon

The NWFP Amendment must not impose additional layers of complex, time-consuming, and costly project evaluations beyond those already required by the Council on Environmental Quality (CEQ) and the USFS Washington Office. The focus should be on streamlining management actions that enhance forest resilience rather than burdening land managers with unnecessary bureaucratic obstacles that delay critical treatments.

Climate change is accelerating the risk of large-scale forest loss due to increasingly severe wildfires, insect outbreaks, and drought. The greatest existential threat to National Forest System lands is not individual species decline or habitat shifts—it is the outright loss of forests themselves. If forests are allowed to convert to shrubland, the core mission of the USFS—to sustain the health, diversity, and productivity of our nation's forests—is fundamentally compromised. SAF states in its Biodiversity in Forest Ecosystems Position Statement[7] that, "Biologically diverse forest ecosystems are better positioned to withstand the effects of climate change, wildfire, pests, pathogens, and invasive species."

To prevent this, the USFS must prioritize proactive thinning, mechanical treatments, and prescribed fire at a meaningful scale to increase forest resilience before disturbances occur. Over-focusing on "endemic, refugia, or relict species" or invasive species management may divert resources from the far greater crisis of widespread forest mortality and type conversion.

Carbon Management Must Reflect Reality, Not Wishful Thinking

The idea of maintaining "in-forest carbon stocks at the landscape level" as a climate mitigation strategy is precarious and ignores both historical precedent and contemporary science. Large-scale wildfires and insect outbreaks in both moist and dry forests demonstrate that:

[7] https://www.eforester.org/Main/Issues_and_Advocacy/Statements/Biodiversity_in_Forest_Ecosystems.aspx

- Stand-replacing fires can and do occur, rapidly releasing decades of stored carbon into the atmosphere.
- Massive insect and disease outbreaks can fundamentally alter forest structure, undermining long-term carbon sequestration potential.
- Relying on forests within the NWFP area to serve as permanent carbon stores is a dangerous assumption.

A carbon-first forest management approach is deeply flawed if it prioritizes leaving forests untouched, only to have them burn catastrophically or succumb to insects, providing no long-term carbon benefit and minimal societal value. A more effective climate strategy would be active forest management that prevents large-scale disturbances, ensuring that forests remain as continuous, functional landscapes rather than shifting to non-forested conditions[8].

If the Forest Service truly intends to support climate adaptation and long-term ecosystem integrity, then it must embrace science-driven, proactive management to protect forests from conversion and degradation—not passively allow climate-driven disturbances to dictate outcomes.

Support Economic Opportunities

The DEIS does not adequately acknowledge the economic devastation that rural communities experienced following the implementation of the original NWFP. Despite the Forest Service's own Bioregional Assessment confirming a 30-year decline in timber processing infrastructure, workforce availability, and economic stability in communities adjacent to the NWFP, this amendment fails to provide a meaningful strategy for reversing that trend.

While education and recreation programs have their place, the most impactful way to support economic opportunities within the NWFP region is through active forest management that achieves multiple objectives simultaneously:

- Improving forest health and wildfire resilience through thinning and fuels reduction
- Creating structural diversity across the landscape while maintaining working forests
- Ensuring long-term, stable economic opportunities for rural communities
- Enhancing road infrastructure and access to support both recreation and forest management
- Providing a predictable timber supply to sustain mills and support local jobs

OSAF's Position Statement - Commercial Timber Harvest on Public Lands in Oregon[9] states, "The Oregon Society of American Foresters supports commercial timber harvest as an **appropriate objective and primary tool** for promoting healthy, sustainable forests on public lands in Oregon."

Without an adequate and consistent timber supply, more mills will close, jobs will be lost, and the forest products infrastructure that remains will become increasingly unstable.

Concerns About Projected Timber Volume and Harvest Distribution

We are particularly concerned about the projected timber volume under Alternative B exceeding that of Alternative D, despite Alternative D being described as more flexible and including a stated goal of treating 20% of young moist Matrix stands within the first decade. This discrepancy may stem from the

8 https://www.eforester.org/Main/Issues_and_Advocacy/Statements/Forest_Management_and_Climate_Change.aspx

9 https://forestry.org/wp-content/uploads/2025/02/Commercial-Timber-Harvest-on-Public-Lands-in-Oregon-9.6.24.pdf

fact that Alternative D proposes only half as much dry forest treatment as Alternative B. Given the clear risks of climate-amplified disturbances such as wildfire and insect outbreaks, we strongly recommend adopting Alternative B under objective FORSTW-ALL-DRY-OBJ-01, as it allows for more extensive and necessary treatment of dry forests.

Additionally, the projected harvest levels for young Moist Matrix lands—only 6,500 to 8,100 acres per year (65,000 to 81,000 acres per decade, as detailed in Table 3-7)—are grossly insufficient. These highly productive Moist Matrix lands (<80 years old) represent some of the most valuable forestlands in the world. Given the geographic scale of the NWFP amendment, which spans Northern California, the entire Oregon Coast, and the Southern Washington Coast, the proposed harvest volume is not enough to sustain the shrinking forest products industry.

In contrast, the projected harvest for Dry Forests is nearly six times greater. While Dry Forest treatments are essential, an over-reliance on them could further destabilize the forest products industry, forcing mills and logging operations to restructure, relocate, or shut down entirely. A stable industry requires a balanced harvest distribution between Moist and Dry Forests.

Expanding the Matrix Land Base to Support Rural Economies

The amendment relies too heavily on the uncertain assumption that restorative treatments in 80-120-year-old Moist LSR stands will provide a stable timber supply. Given the history of litigation and controversy surrounding these stands, it is unlikely that these treatments will deliver reliable volumes to support the timber industry.

To stabilize the socioeconomic impacts on the forest industry and affected communities, we strongly recommend increasing the overall acreage allocated to the Matrix by transitioning portions of adjacent LUAs as identified on page 4 above.

Expanding the Matrix LUA would help ensure a more predictable timber supply, allowing mills to plan long-term investments, sustaining employment, and strengthening rural economies. Without this adjustment, the NWFP amendment risks further economic contraction and continued loss of vital forest industry infrastructure.

Conclusion

OSAF appreciates the opportunity to provide comments on the DEIS for the NWFP Amendment. While we acknowledge the complexity of revising such a large-scale management framework, we believe the current amendment fails to address the urgent realities facing our forests, rural communities, and the timber industry.

The greatest threats to Pacific Northwest forests today are severe wildfires, insect outbreaks, and climate-driven disturbances. Yet, rather than prioritizing active, science-based forest management to enhance resilience, improve forest health, and sustain local economies, the NWFP Amendment largely maintains outdated restrictions that have already proven ineffective. If this amendment is to be successful, the Forest Service must:

1. Reevaluate the spatial footprint of the plan to ensure that management boundaries reflect ecological and economic realities.
2. Expand active management tools across all LUAs, particularly in fire-prone forests, while eliminating unnecessary regulatory barriers such as S&M.
3. Increase transparency in the reporting of land use allocations, timber availability, and projected harvest volumes to ensure the public understands the full impacts of this amendment.

4. Ensure a sustainable, predictable timber supply by adjusting Matrix land allocations and adopting more ambitious treatment targets to support the forest products industry and rural economies.
5. Adopt an aggressive wildfire suppression strategy that prioritizes firefighter and community safety over passive "managed wildfire" policies that increase risk to forests, private landowners, and infrastructure.
6. Expand salvage opportunities to allow for timely post-disturbance recovery, reducing fuel loads and ensuring that economic value is retained while reforestation efforts move forward.

Without these changes, the NWFP Amendment will perpetuate the same challenges that have led to widespread litigation, mill closures, and unhealthy forests over the last three decades. Forests in the Pacific Northwest are at a tipping point, and the Forest Service must adopt a plan that recognizes the necessity of active, science-based management rather than one that continues to constrain it.

OSAF stands ready to work with the agency to ensure that federal forest lands remain productive, resilient, and sustainable for future generations. We urge the USFS to revise the NWFP Amendment in a way that truly supports forest health, rural economies, and responsible stewardship of our public lands.

Sincerely,

Amanda Sullivan-Astor, CF
Oregon SAF
2025 State Chair