



**DEPARTMENT OF  
NATURAL RESOURCES**

**Forest Resilience Division**

1111 WASHINGTON ST SE  
MS 47013  
OLYMPIA, WA 98504-7001

**360-902-1000**  
[WWW.DNR.WA.GOV](http://WWW.DNR.WA.GOV)

Jacque Buchanan, Regional Forester, Pacific Northwest Region  
Jennifer Eberlien, Regional Forester, Pacific Southwest Region  
333 SW 1st Avenue  
PO Box 3623  
Portland, OR 97208-3623  
[sm.fs.NWFPquestion@usda.gov](mailto:sm.fs.NWFPquestion@usda.gov)

RE: Northwest Forest Plan Amendment Draft Environmental Impact Statement

Dear Regional Forester Buchanan and Regional Forester Eberlien:

Please accept this comment letter on behalf of the Washington State Department of Natural Resources (DNR) on the Northwest Forest Plan (NWFP) Amendment Draft Environmental Impact Statement.

DNR's mission is to manage, sustain, and protect the health and productivity of Washington's lands and waters to meet the needs of present and future generations. DNR is a partner in Shared Stewardship with the USDA Forest Service and a Cooperating Agency as part of this NWFP amendment process.

Our agencies are working extensively together to plan, implement, and monitor forest management and restoration projects on National Forest System lands in Washington State. Forest Service management decisions play a critical role in advancing numerous strategic initiatives in Washington including the 10-Year Wildfire Crisis Strategy, Washington State Forest Action Plan, and 20-Year Forest Health Strategic Plan: Eastern Washington.

DNR appreciates the leadership of the Forest Service in engaging Tribes, agencies, partners and the public throughout this amendment process, and we commend the Forest Service for utilizing the advice of the Federal Advisory Committee (FAC) in the development of alternatives.

DNR supports elements of all action alternatives as described in the draft Environmental Impact Statement (EIS). We strongly encourage you to utilize elements of Alternative B and D as you develop the final EIS.

Washington State Department of Natural Resources respectfully requests the following considerations as you prepare the final (EIS). The comments are organized following the themes used in the draft EIS.

### **Tribal Inclusion**

DNR is encouraged by the strong focus on Tribal Inclusion throughout the NWFP amendment. Alternatives B and D expand co-stewardship and increase the integration of Indigenous Knowledge into project planning and management decisions. DNR supports the focus on coordinating with Tribes to protect culturally important plants and to promote landscape-scale prescribed and cultural burns as described in Alternative D. Alternative D also includes important guidance to inform post-disturbance restoration in line with Tribal interests and restoration of First Foods.

The final EIS should further clarify the relationship between Tribal Inclusion standards and guides and the standards and guides for each land use allocation. Future projects planned under the amended NWFP should ensure that local Forest Service units and Tribal partners can meaningfully incorporate Tribal interests into projects, regardless of the NWFP land use allocation. Guidance on how line officers should prioritize Tribal interests when they potentially conflict with NWFP standards and guidelines should be included in the amendment.

Alternative C limits the ability of the Forest Service to advance Tribal Inclusion and should not be selected. As described in the draft EIS, “Alternative C...would result in obstacles to the Forest Service in meeting legal obligations to Tribes” (p.3-9).

### **Forest Stewardship**

DNR supports the proposals described in the NWFP amendment in Alternatives B and D to accelerate restoration of forest ecosystems. Proactive stewardship is critical to conserving and recruiting Northern Spotted Owl (NSO) habitat, especially in dry forests and young moist forests. Active management is needed to promote healthy and resilient forest ecosystems, particularly as we experience increasing temperatures and disturbance activity due to a warming climate.

#### Clarify Methods to Identify Dry and Moist Forests

The proposed “dry” and “moist” forest dichotomy is problematic for several reasons. The draft EIS is unclear about the preferred approach that will be used to characterize dry and moist forests in the NWFP area. The draft EIS describes at least six different approaches that can be used to determine whether a forest is “dry” or “moist” at the stand scale (p.A1-17). The numerous approaches identified in the EIS are likely to create considerable uncertainty for land managers who will be required to apply plan direction in future vegetation management projects.

If a forested stand could be considered either dry or moist using the various methods described in the draft EIS, it is unclear what standards and guidelines should be utilized to inform

management. We are concerned the lack of clarity will lead to confusion and delay future projects. In the final EIS, we suggest that landscape context and fire regime are utilized as the primary methods to determine whether a stand is dry or moist.

#### Develop Standards and Guides that Appropriately Reflect Regional Differences in Moist Forests

Management objectives and standards and guidelines should focus on wildfire resilience, climate adaptation, and managing within natural range of variation (NRV) based on landscape context across all forest types and land use allocations. DNR recommends that standards and guides are differentiated by physiographic province as well as forest type. For example, the eastern Cascades should have their own set of standards and guidelines that primarily follow the standards and guidelines for dry forests as currently proposed in the NWFP amendment.

The draft EIS fails to clarify the distinctions between moist forests east of the Cascades and moist forests west of the Cascades, despite the recognition that moist forests that experienced mixed severity fire regimes have different desired conditions:

*In moist forest vegetation types with mixed severity fire regimes, the development of late successional and old-growth forest conditions occur in the context of patchy wildland fire, which creates gaps, thins some forest stands, and leaves some patches less affected. These fire dynamics support the development of multiple age cohorts including old-growth forest stands (p. A1-17).*

The DEIS identifies fire diverse forests in the east Cascades as “moist forests,” which, as currently proposed would significantly limit the ability of the Forest Service to restore fire-dependent forest ecosystems on the Okanogan-Wenatchee National Forest and Gifford Pinchot National Forest. Moist forests in the east Cascades are fundamentally different than moist forests on the west side and thus require a different set of standards and guidelines.

As proposed, the draft EIS will limit the ability of land managers to manage moist forests in the east Cascades and Klamath Provinces for forest health, wildfire resilience, and climate adaptation. Moist forests in these Provinces have very different fire histories, climate vulnerabilities, and wildfire risks. As the draft EIS notes, moist forests in the east cascades are often multi-aged with a mix of old, mature, and young trees and no clearly dominant age class. The need to determine stand age to decide if a stand can be treated will add an additional subjective process that will further complicate and slow down future management.

There are excellent examples to draw from in developing more appropriate standards and guidelines from the Okanogan-Wenatchee National Forest (OWNF) including the OWNF Restoration Strategy ([https://www.fs.usda.gov/Internet/FSE\\_DOCUMENTS/stelprdb5340103.pdf](https://www.fs.usda.gov/Internet/FSE_DOCUMENTS/stelprdb5340103.pdf)) and OWNF Late-Successional Reserve Assessment ([fs.usda.gov/Internet/FSE\\_DOCUMENTS/fseprd1176062.pdf](https://www.fs.usda.gov/Internet/FSE_DOCUMENTS/fseprd1176062.pdf)).

## Promote Landscape-Scale Restoration and Strategic Placement of Treatments

The draft EIS includes acreage targets associated with implementation of the amended NWFP for dry forests:

*Within 15 years of amendment approval, implement treatments that contribute to ecological resilience on at least one-third of dry forests (527,000 to 643,000 acres per decade or 790,000 to 964,000 acres per 15 years across the Northwest Forest Plan area (p.A1-22)).*

These targets should be updated to reflect the science supporting the Forest Service's 10-Year Wildfire Crisis Strategy, DNR 20-Year Forest Health Strategic Plan: Eastern Washington, and numerous academic journal articles and fire modeling studies that emphasize the need to focus treatments in large, contiguous areas and at appropriate intensities. A more meaningful goal would be to treat at least 30-45% of dry and moist-mixed conifer forested areas within priority watersheds and fireheds in the east Cascades and Klamath Provinces, and to spatially arrange treatments in a way that provides the highest likelihood that wildfire resilience and climate adaption benefits will be realized. This will necessarily include a focus on increasing opportunities for successful fire management operations and use of wildland fire to support resource benefits and reduce hazards to values at risk, especially accumulated fuels near people, property, drinking water source areas, and critical infrastructure. If the final EIS includes treatment acreage targets, the Forest Service should further clarify if dry forest and young moist forest treatment targets described in the EIS overlap with the wildfire resilience treatment targets. All treatment targets should be inclusive of ongoing maintenance treatment needs.

### Matrix

DNR supports conserving mature forest Matrix established before 1825 as described in Alternatives B and D. DNR also supports allowing timber harvest as a tool in Matrix with stand establishment dates between 1825-1905 to maintain and restore ecosystem integrity, reduce wildfire risk to communities and infrastructure, and meet Tribal use priorities. We recommend that the final EIS incorporate climate adaptation and drought vulnerability as additional reasons to manage mature matrix forests. DNR supports protecting all individual trees established before 1850 in dry forest Matrix on National Forest System lands.

### Late-Successional Reserves

In Late Successional Reserves, DNR supports the proposal to increase the stand age to 120 years for treatment. This will provide the Forest Service with additional time and flexibility to meet the goals of this land use allocation and ensure the development and sustainability of future late-successional forests.

In the eastern Cascades, the amount of dense forest and spatial arrangement of different forest seral stages in Late-Successional Reserves should be based on natural range of variability (NRV).

The Forest Service should be managing for late-seral dense habitat at levels and in locations that are sustainable for each potential vegetation type (PVT) within an ecoregion based on NRV. The [OWNF Forest Restoration Strategy](#) is a good reference for this approach to management and is the basis for the Late-Successional Reserve Assessment that was just updated on the OWNF, in addition see Halofsky et al. 2024 and Gaines et al. 2022.

DNR supports the proposal in Alternative D to allow Forest Supervisors to approve Late-Successional Reserve assessments and to approve certain silvicultural activities within Late-Successional Reserves as they are consistent with the NWFP standards and guidelines. Providing Forest Supervisors with the authority to directly influence the management of LSRs will provide local Forest Service staff, cooperating agencies, Tribes, and partners with the ability to promote responsible stewardship of LSRs.

### Survey and Manage

Survey and manage requirements for stands that are 120 years or younger should be the same as the requirements that the NWFP currently maintains for stands that are 80 years or younger as described in the Pechman exemptions. The current Survey and Manage requirements significantly limit the ability of the Forest Service to meet the goals of the NWFP plan and result in excessive costs to the public associated with restoration projects. For example, the Gifford Pinchot National Forest and DNR collectively spent more than \$1.5 million on Survey and Manage compliance for the Little White Salmon Forest Resiliency and Fire Risk Mitigation Project, despite the fact that the project is a leading example of science-based restoration, no old growth will be treated commercially, and the project will result in treatment activity in less than 10% of the total project footprint. The current requirements associated with Survey and Manage are not tenable, especially in the face of a warming climate and wildfire crisis. The NWFP amendment should be clear that stands under 120 years are exempt from Survey and Manage.

Regardless of the outcome of the NWFP amendment, the Forest Service needs to prioritize funding the Annual Species Review process. Since 1994, hundreds of species have been added to the Regional Forester's sensitive species list. However, many of these species that we knew little about have turned out to be quite common or dependent on disturbance. Conducting the Annual Species Review process would result in updates to the species list and survey protocols and reduce on-going costs associated with plan implementation.

### **Wildfire Resilience**

In Washington, uncharacteristic high-severity wildfire has resulted in the loss of tens of thousands of acres of northern spotted owl (NSO) habitat under the current NWFP, especially on the Okanogan-Wenatchee National Forest. Large patches of high-severity wildfire pose a significant threat to NSO habitat, and climate change is increasing risks to habitat posed by fire, drought, insects, and disease.

Alternative D is best aligned with the need to address wildfire risk to people, property, and infrastructure, and to promote fire-adapted landscapes and communities. Alternative D prioritizes fuels treatments near values at risk, regardless of land use allocation, and supports the Forest Service utilizing managed wildfire in designated wilderness and in locations suitable for wildland fire use.

### Post-Fire Recovery and Management

Forests will continue to experience wildfires that have both positive and negative ecological effects. In dry forests, DNR strongly supports science-based post-fire management that focuses on restoring stand structures and species composition towards desired conditions.

The draft EIS states that salvage in dry forest Matrix “should retain all live trees” (p. A1-23). This overly simplified approach and management direction will limit the ability of the Forest Service to implement dry forest restoration principles within fire footprints. The rationale and science related to postfire management has evolved in recent years to focus on complementing the positive work of wildfires as well as mitigating negative effects (Larson et al 2022, Churchill et al. 2022, Greenler et al. 2023). Accordingly, post-fire treatments in moderate to low-severity areas should be distinguished from high-severity.

Moderate and low-severity wildfires typically do positive restoration work, but do not always adequately reduce stand densities in line with NRV or desired future conditions. Low and moderate severity fires may act as an initial treatment, but in some cases, additional follow up treatments are necessary to reduce density to target levels, create spatial heterogeneity, shift stands towards desired species compositions, and reduce risk of future high severity reburns. In dry forests, post-fire harvests and fuels treatments in moderate and low severity burned areas should focus treatments where additional density reduction and fuels treatments are needed following a fire to move individual stands and forest landscapes towards desired conditions.

In patches of large, high-severity fire in dry forests, post-fire management actions should focus on risk mitigation and watershed restoration such as replanting, soil stabilization and sediment reduction measures, and addressing potential landslide hazards. Replanting in dry forests should consider projected soil moisture deficit, especially where future climate is unlikely support forest cover. In areas with significant numbers of standing dead trees, salvage operations should also focus on promoting public safety and effective future fire operations by removing hazard trees near roads, critical infrastructure, and along Potential Control Lines (PCLs).

### **Climate, Ecosystem Integrity, and Carbon**

DNR supports the inclusion of plan direction to explicitly recognize the anticipated impacts of a warming climate and to promote adaptation strategies. The consideration of climate vulnerability and adaptation in project planning will result in opportunities for Forest Service projects to meet the needs of communities in a rapidly changing climate and adaptively

manage to ensure forest ecosystem health and resilience. Adaptation strategies proposed in the EIS will also support aquatic restoration and aid in reducing risks associated with flooding.

DNR recommends that the final EIS clarify the hierarchy of carbon sequestration relative to Tribal Inclusion, Forest Stewardship, and Wildfire Resilience. Carbon sequestration is a secondary goal to these primary objectives, and carbon sequestration should not be used as a justification to forego management actions that support the Forest Service's responsibilities to Tribes and treaty rights, forest health, wildlife habitat, wildfire risk reduction and rural economic development.

### **Support Economic Opportunities and Sustainable Communities**

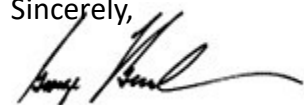
The combined effects of mill modernization, log exports, and reduced federal timber supply since 1994 significantly impacted rural communities across Washington State and the NWFP area. Alternatives B and D will result in increases in economic activity and job creation in the NWFP area while supporting meaningful ecological restoration outcomes. These alternatives also encourage Forest Service engagement with rural communities, underserved youth, and Tribes through workforce development. Alternative D provides the greatest flexibility to support active forest management with an emphasis on hazardous fuels reduction near communities and infrastructure.

Providing a meaningful supply of forest and non-forest products from federal lands is an important goal of the NWFP amendment. In order to achieve the economic and ecological goals of the NWFP, annual timber harvests on the Gifford Pinchot National Forest, Olympic National Forest, Mount Baker-Snoqualmie National Forest and Okanogan-Wenatchee National Forest need to be increased significantly. We recommend the USFS include timber targets for each National Forest in the NWFP amendment to reflect its commitment to forest restoration and rural communities. These timber targets should be evaluated on a five-year rolling basis and complementary to but separate from the acreage goals for treatments in the preferred alternative.

In conclusion, the health and management of our National Forests are vital not only to the ecological integrity and resilience of our forests but also to the well-being of local communities and the economic health of Washington State. We are committed to continuing our partnership with the Forest Service and other stakeholders to ensure that forest management decisions reflect a balanced approach to environmental stewardship, Tribal Inclusion, wildfire resilience, and economic sustainability.

Thank you for your consideration of these comments.

Sincerely,

A handwritten signature in black ink, appearing to read "George Geissler", with a stylized flourish at the end.

George Geissler

### Reference:

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