

March 17, 2025

RE: Northwest Forest Plan Amendment - Draft Environmental Impact Statement Comments from the Oregon Hunters Association

The Oregon Hunters Association (OHA) is a sportsmen’s conservation organization with over 12,000 members in 26 chapters across Oregon. OHA values our National Forests as a public place to hunt and recreate, and as a valuable asset providing habitat for the wildlife we care about. As such, the management and access of these lands are of critical importance to OHA. We have been engaged in numerous projects to improve and protect habitat conditions, and we value our partnership with the U.S. Forest Service (USFS). We are providing comments and input on the Northwest Forest Plan Amendment (NWFP) – Draft Environmental Impact Statement (DEIS).

OHA agrees with the need for an amendment to the NWFP and views Alternative D in the DEIS as the best path forward. With that, OHA would offer these additional comments and perspectives.

The term “habitat”, well not defined in the glossary of terms in Appendix F of the DEIS, is used synonymously with old growth habitat or late seral habitat. Public forestlands should provide a full range of habitats and seral stages for Oregon’s indigenous species.

Focusing solely on late seral species in the current, and likely future NWFP, has been a major factor in reducing population levels of Roosevelt elk on the west slope of the Cascade mountains and in southwestern Oregon. Elk management objectives established by the Oregon Department of Fish and Wildlife (ODFW) for areas that overlap the Mt. Hood, Willamette, Umpqua, and Rogue-Siskyou National Forests all have Roosevelt elk populations at less than 50% of their respective management objectives.

A lack of active management under the current NWFP has also led to the reduction in quality summer range habitat for mule deer on the east slope of the Cascade mountains. The current Oregon mule deer management plan (2024) clearly shows that nearly all of the mule deer herd ranges that overlap with national forests on the east slope of the Cascade Mountains are at medium to high levels of concern. Implementation of Alternative D is the best alternative to address these habitat needs.

Public lands are for all and should be managed for more than just late seral species. Biological diversity is critical to sustaining healthy ecosystems and provides a variety of social and economic values to people. Management options need to strive for a more balanced range of forest conditions to provide habitat and opportunities for more than old-growth and late seral species. Early seral forest supports a similar proportion of state-listed species as older forests. Simply focusing on one cohort of species across the majority of the planning area has led, and will continue to lead other species in need of conservation action down a path of reduced abundance through the loss of critical habitat.

Active management is needed as identified for everything from forest health, to seral stage development, to community and economic considerations.

Thank you for the opportunity to comment.

Mike Totey

Conservation Director

Oregon Hunters Association