



March 17, 2025

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Submitted via web-portal: <https://cara.fs2c.usda.gov/Public//CommentInput?Project=64745>

**RE: Comments on DEIS, Northwest Forest Plan Amendment**

Dear Ms. Buchanan and Ms. Eberlien,

This document transmits the comments of Trout Unlimited (TU) on the Draft Environmental Impact Statement (DEIS) for the Northwest Forest Plan (NWFP) Amendment.

TU is America's largest and oldest organization dedicated to the conservation, protection, and restoration of our trout and salmon populations and their watersheds. Our mission is to bring together diverse interests to care for and recover rivers and streams so our children can experience the joy of wild and native trout and salmon. This mission is fulfilled by 225 professional staff and some 300,000 members and supporters organized into more than 400 chapters across the country.

Because the vast majority of our best remaining habitats for salmonids (trout and salmon) -- especially in the West -- is found on public lands, realization of our mission hinges upon strong partnerships with the managers of our federal public lands, including the USDA Forest Service (USFS). TU has a longstanding and productive relationship with the USFS nationwide, characterized by stewardship and project management agreements, effective collaboration on project planning and execution, match funding, and on-the-ground work that enhances water supply and quality, coldwater habitat and fish passage, and landscape and watershed resilience. The TU-USFS partnership is formalized in a National Keystone Agreement signed in 2023.

Throughout the NWFP planning area, TU works closely with USFS staff at the Region, Forest, and District levels to leverage resources to maximize benefits for local human communities and economies and salmonid populations. To date, our partnership has completed hundreds of projects in Washington, Oregon, and California that improve fish passage, restore degraded habitat, boost instream flow, reconnect floodplains, reintroduce beavers, and enhance the resilience of landscapes and watersheds to drought, fire, and other influences.

The comments we submitted during the scoping phase of the NWFP amendment process, dated February 2, 2024, are herein incorporated by reference.

## General Remarks

On March 1, President Trump signed an executive order titled “[Immediate Expansion of American Timber Production](#),” which directs federal land managers to “fully exploit our domestic timber supply,” and to “issue new or updated guidance regarding tools to facilitate increased timber production and sound forest management, reduce time to deliver timber, and decrease timber supply uncertainty”; to “improve the speed of approving forestry projects” under section 7 of the Endangered Species Act; to “consider and, if appropriate and consistent with applicable law, adopt categorical exclusions administratively established by other agencies to comply with the National Environmental Policy Act and reduce unnecessarily lengthy processes and associated costs related to administrative approvals for timber production”; and to “consider and, if appropriate and consistent with applicable law, establish a new categorical exclusion for timber thinning and re-establish a categorical exclusion for timber salvage activities.” We respectfully observe that fulfillment of this EO seems likely to alter all NWFP DEIS alternatives -- considerably. It is thus difficult, if not impossible, to comment on potential impacts and outcomes of the amended NFWP, as currently drafted.

Notwithstanding the lack of clarity around the effects of the March 1 Executive Order on the NWFP Amendment, we find elements in DEIS alternatives B, C and D as currently described that would support statutory requirements, species recovery plans, and resource management objectives related to protecting water quality, enhancing ecosystem function, and conserving salmonids and freshwater fishing opportunities. However, these elements are not coordinated across alternatives.

The NWFP Amendment covers a majority of watersheds which constitute the native range of dozens of salmonid species, Distinct Population Segments (DPSs), and Evolutionarily Significant Units (ESUs). These species historically have served as keystones for whole ecosystems, Indigenous cultures, and local fishing-based economies. Yet most populations of these species and sub-species are today small fractions of their historical average. Many Indigenous communities and local fishing economies have been devastated by their decline. For the past two years there has been no commercial and sport fishing season for salmon in northern California; that unfortunate outcome is probable again this year.

Yet we have plenty of empirical and historical evidence (e.g., removal of obsolete dams on the Elwha and Klamath Rivers) that if we protect, restore and reconnect coldwater habitats in the Pacific Northwest, native salmonids will repopulate previously inaccessible or too-degraded waters and, in some watersheds which yet retain an abundance of high quality spawning and rearing habitat, we can expect rapid improvement in salmonid abundance, diversity and resilience.

The NWFP Amendment represents an important opportunity to boost protection and restoration of designated critical and other vital coldwater habitat for native salmonids in the Pacific Northwest. Carrying forward the provisions and guidance of the Aquatic Conservation Strategy (ACS) as adopted in the 1994 NWFP is a good starting point. But the DEIS comes up short in providing supplemental direction for prioritizing the goal of restoring native salmonids and the people that depend on them for food, culture, and livelihood.

**To deliver the greatest benefits for salmonids, and the communities and cultures that depend on them, we suggest the final EIS reflect a hybrid strategy that incorporates elements from Alternatives B, C and D. Specifically, we recommend combining Alternative B’s active forest management and targeted riparian restoration with Alternative C’s strong riparian protections and passive recovery in key watersheds and Alternative D’s fire risk reduction actions and expanded co-stewardship efforts.**

## Aquatic Conservation Strategy

TU strongly supports retention of the Aquatic Conservation Strategy (ACS) in the NWFP Amendment as adopted under the 1994 NWFP.

The DEIS refers frequently to the need to become more flexible in the management of forest resources. We interpret this to mean or include an “adaptive management” approach, that is, a structured process of decision-making with the goal being to reduce uncertainty over time via consistent monitoring of natural resources and systems. We support this approach, but note that there currently is little to no framework for making adaptive decisions because the requisite field analyses, in particular of watershed conditions, are not being completed or updated consistently. There is a critical need to complete such analyses; TU has the expertise and stands ready to assist the agency in doing that. However, a “flexible” management paradigm fundamentally requires sufficient agency resources to monitor on-the-ground conditions consistently and to ground-truth potential management actions with current data.

The DEIS predicts enhanced implementation of the ACS under Alternative B (the Proposed Action) by emphasizing proactive restoration of riparian areas, reducing wildfire risk by increasing the pace and scale of forest thinning and fire management, and by improving fish habitat as a result of more flexible application of restoration actions. The DEIS appears to forecast that under Alternative C, the ACS would remain largely *status quo*. While this alternative would implement the strongest protections for riparian areas and limit management activities near streams, the ACS could be undermined by the higher risk of extreme wildlife events anticipated under this alternative and the slower pace and scale of restoration of degraded streams and riparian resources. Under Alternative D, the DEIS seems to predict that ACS-related protections would be expanded through more flexible management, an increase in fire risk reductions treatments, and expanded tribal and community engagement in conservation efforts.

While the programmatic nature of the DEIS does not enable a deep dive into potential impacts on the ACS, we agree that a context-dependent and science-based combination of more active management (to reduce extreme fire and flood events, improve habitat connectivity, and protect water quality and coldwater refugia via enhanced protection of Riparian Reserves and other resource areas with high habitat values) is supported by current science and our restoration experience over the past two decades. [\[Reeves et al, 2018\]](#)

## Old Growth Forests

Old-growth forests are an important component of the diverse mosaic of habitats that salmonids require [\[Reeves et al, PNW Science Synthesis 2018\]](#) and are essential to promoting landscape and watershed resiliency, storing carbon, mitigating the impacts associated with “weather whiplash” and year-to-year variations in temperature and precipitation, supplying clean water sources, and supporting sustainable rural economies.

Conserving and restoring old-growth conditions makes sense both ecologically and economically. Old-growth conditions support many of the most important social and economic benefits derived from our public lands, including clean water, productive habitat, cultural and traditional values, and recreational opportunity. To maximize these benefits from our public lands, the Forest Service should prioritize safeguarding existing old-growth forest while also promoting the restoration of old-growth conditions more broadly on previously disturbed or altered forest lands.

The DEIS's analysis of proposed strategies and actions on old growth forests does not reflect this prioritization across all alternatives. Conserving and restoring old growth will require a combination of active and passive management which are largely separated under different alternatives. For example, under Alternative B, potential impacts to old growth include short-term disturbance due to thinning and fuels reduction, with localized disruptions related to active management efforts, while potential benefits include enhancement of fire resilience and ecosystem stability, in part through restoration of late-successional habitats. Alternative C provides the strongest protection against logging and old growth habitat disturbance by restricting timber harvest, especially in moist forests, but does not address the potential for elevated risk of extreme wildfires [Steel et al, 2022] and other impacts associated with warmer and drier conditions due to lack of limited intervention and active forest management. Alternative D predicts that enhanced timber harvest flexibility may pose some risks to mature forests and higher levels of active management could alter old growth structure in some areas but anticipates improved long-term resilience by reducing fire risk through thinning and prescribed burns and tribal co-management to integrate traditional ecological knowledge into old growth conservation.

To fully realize the benefits of large tracts of old growth forest for people, fish and watersheds, we suggest the Final EIS reflect a balanced combination of active forest management, including targeted logging, thinning, and prescribed burns, guided by the best available science and Indigenous knowledge, with greater clarity around buffers and other protections for extant old growth resources, streams and stillwater bodies, and clearer direction for restoring (not simply increasing logging in) late successional resource areas. Further, management actions in late successional resource areas should factor in the results of water resource assessments.

### **Benefits and threats to salmonids under DEIS Alternatives B, C & D**

There is no opportunity for productive fishing or hunting without healthy, productive habitat. Similarly, productive aquatic, riparian and terrestrial habitat is essential for sustaining local communities and cultures dependent on salmon and steelhead. Therefore, an overarching goal and primary effect of the amended NWFP should be to improve and sustain water quality, habitat values, and salmonid populations. As presented in the DEIS, this goal and effect are undermined by a lack of synthesis between and separation of the most beneficial strategies and actions across Alternatives B, C and D.

Alternatives B and D would boost forest thinning and fire-risk reduction efforts, which is anticipated to cause short-term disturbance but long-term benefits for aquatic and riparian habitats. Alternatives B and D also are predicted to increase stream habitat resilience through more comprehensive riparian restoration efforts, while the potential increase in prescribed burns and fuel treatments is expected to impair water quality and stream habitat through short-term sedimentation impacts but improve long-term ecosystem productivity.

We recognize that the effects of thinning and prescribed burning in riparian areas is an emerging field of research and that the effects of these practices have shown mixed results on the productivity of fish populations and their food sources (Roon et al, 2022) (Sanders et al, 2024). At the same time, it is clear that streams with riparian areas that do not have some disturbance (i.e., fire, thinning, etc.) are also not as productive as they could be and are more susceptible to extreme, damaging fires. Fundamentally, stream fishes are adapted to dynamic environments and adopting forest management practices that mimic this dynamism is critical for their persistence or recovery. (Reeves et al, 2018)

Alternative C would maintain the most stringent protections for older forest resource areas and riparian zones. The reduced levels of timber harvest and forest thinning projected under this alternative would better conserve closed-canopy conditions that are beneficial for keeping water temperatures and stream habitat cool yet could increase the risk of extreme fire events. Lower levels of anticipated management intervention in riparian restoration are expected to reduce short-term impacts yet could impede improvements in salmonid habitat connectivity, processes generating spatial and temporal habitat variability, and water quality over the long term.

The Final EIS for the NWFP should incorporate and synthesize *all* the most beneficial strategies for conserving and restoring trout, salmon, and steelhead populations, and opportunities to fish for them. All strategies should link to current science and be evaluated contextually. Across all alternatives, these strategies are:

1. Strengthening Riparian Protections and Implement Stronger Controls for Riparian Management. Riparian Reserves (RRs) should be maintained and enhanced with a combination of targeted restoration actions, including process-based restoration and prescribed burning when conditions are favorable, rather than by relying solely on passive recovery. Streamside protections should be strengthened beyond current NWFP standards, particularly in areas with high salmonid populations, while resource areas that provide coldwater refugia should be prioritized for permanent protection. Increase the oversight and care with which riparian thinning and prescribed burning are enacted via controls on contracts and active oversight by USFS staff. Increased oversight will ensure proper, science-based thinning and burn methods are adhered to in these sensitive habitats.
2. Restoration to Improve Aquatic Habitat. Among other proven strategies and tactics, the USFS should increase placement of large wood structure in streams to create and enhance complex habitats for juvenile fish, expand floodplain reconnection projects to improve spawning and rearing conditions, and restore degraded wetlands and side channels, particularly in headwater streams (*Reeves et al 2018* provides new understanding of the importance of non-fish-bearing streams to overall forest function). Trout Unlimited has decades of experience in working with the USFS and other partners to design and implement exactly these kinds of active, collaborative restoration projects across the NWFP planning area as well as on private lands.
3. Fire and Forest Management for Long-Term Watershed Health. Increasing the pace and scale of targeted thinning in dry forests to reduce high-severity wildfire risks may help protect water quality, while limiting timber harvest in older moist forests will improve canopy cover and preserve cool water temperatures. Tactical use of prescribed burning may help prevent extreme wildfire events that could cause massive sedimentation into streams.
4. Improving and Sustaining Resilience and Water Quality. Boosting landscape and watershed resilience in the face of increasing “weather whiplash” phenomena and more frequent, prolonged drought across the NWFP planning area can be accomplished by (1) prioritizing restoration projects in high-risk watersheds to build resilience; (2) incorporating the best available science into management of streams to enhance and sustain dry-season flows and cold-water habitats; and (3) scaling up the pace of road repairs and decommissioning to reduce sediment runoff into fish-bearing streams.

5. Leverage Tribal and Community Co-Stewardship. Traditional ecological knowledge has been vastly underutilized in the effort to keep our national forest lands and waters healthy and productive. We can engage this wisdom to better effect and for the collective good by partnering with tribes and Indigenous communities in co-management of key watersheds to integrate Indigenous knowledge in fisheries conservation, as proposed (to some extent) in Alternatives B and D. In addition, local watershed stewardship groups have proven effective in restoring habitat and watershed connectivity; co-stewardship efforts which align federal and community-based conservation strategies should be prioritized in both planning and funding.

### **Recommendations of the Northwest Forest Plan Federal Advisory Committee**

Alternative B (the Proposed Action) of the DEIS most closely reflects the recommendations of the Northwest Forest Plan Federal Advisory Committee. As articulated above, we recommend combining those components of the Proposed Action that would best improve prospects for protecting, restoring and reconnecting high-value salmonid habitats with those components of Alternatives C and D that would be synergistic. More broadly we salute the efforts of the advisory committee to deliver unanimous counsel on practical, effective strategies that will better support local communities, cultures and economies while complying with statutory requirements for multiple use and improving forest and watershed resilience and productivity.

### **Ancillary issues**

Recreational opportunity and access. The DEIS provides superficial consideration of the effects of proposed active management (i.e., timber harvest and forest thinning) on outdoor recreation, including fishing and hunting. Across the NWFP planning area, outdoor recreation is now a primary economic driver, while timber harvest and thinning projects usually require large area closures to recreational use. We suggest the Final EIS include language that articulates the Forest Service's intent to engage and consult with outdoor recreation and fishing and hunting advocates in the implementation of the adopted alternative, through both project planning and ad hoc collaboration meetings, to maximize benefits for these uses and the local communities and economies that depend on them.

Expansion of the Travel System of the NWFP Planning Area. Two of the three action alternatives of the DEIS would increase the pace and scale of active management (i.e., timber harvest and forest thinning). Such actions often require improvements to existing travel infrastructure and/or construction of new roads to fulfill objectives. The impacts of such improvements or additions to the travel system of national forests on other forest resources, uses and values may not be sufficiently considered at the Project level, especially under Categorical Exclusions, to prevent significant adverse impacts on water quality, aquatic and riparian habitats, fish and wildlife, and fishing and hunting. Consistent with the USFS Travel Management Rule (36 CFR II, Sec. 212), all national forests are required to identify the minimum travel system required for proper administration of a forest and to decommission or reclassify non-essential travel routes and infrastructure. Roads and associated infrastructure such as poorly maintained culverts cause some of the most problematic impacts to fish and wildlife habitat and to fishing and hunting opportunities. The Final EIS should provide clear direction to NWFP-managed forests regarding compliance with the Travel Management Rule and creation and maintenance of travel infrastructure needed to achieve NWFP goals and objectives while minimizing impacts to sensitive species, habitats and non-motorized recreational opportunities.

Adequate Staffing and Funding are critical to success. It seems likely that the efficacy of the Proposed Action's more intensive management will hinge largely on the Forest Service's capacity to complete requisite environmental analyses (even if the acreage excluded from NEPA evaluation is legislatively or administratively expanded) and to implement post-logging treatment of slash piles, sustained prescribed burning, and follow-up treatment of understory vegetative response. The Final EIS should articulate how the USFS will achieve NWFP goals and objectives under several staffing and funding scenarios.

## Conclusion

Acknowledging that the programmatic nature of the DEIS precludes a thorough examination of potential effects on all resident species, and that future project-level environmental analysis would continue to consider site-specific effects to ensure that project actions do not "result in a loss of species viability or create significant trends toward federal listing" per FSM 2670.32, we suggest the DEIS reflect an explicit commitment to work closely with state fish and wildlife agencies and tribal partners to adaptively manage salmonid habitats and populations under the Amended NWFP. We further recommend the Final EIS summarize and integrate the findings of the most current science on salmonid conservation and management, in particular related to the conclusions of the recent review of science related to the Aquatic Conservation Strategy of the NWFP ([Reeves et al 2018](#)).

**To deliver the greatest benefits for trout and salmon and the ecosystems, communities, cultures and sporting heritage that depend on them, the NWFP Final EIS should incorporate and synthesize elements from Alternatives B, C and D. Specifically, the Final NWFP Amendment should combine the active forest management and targeted riparian restoration actions proposed in Alternative B with the strong riparian protections and passive recovery in key watersheds as described in Alternative C and the fire risk reduction actions and expanded co-stewardship programs proposed in Alternative D.**

Trout Unlimited is committed to working in a non-partisan and collaborative fashion with all stakeholders of our national forests. Our many years of developing and successfully completing habitat restoration and enhancement projects with tribes, timber and mining companies, grazing interests, and federal and state resource agencies have proven that science-based, sustainably funded efforts to improve the health and resilience of our public lands and waters can be realized over time frames that meaningfully support national resource management priorities, including wildfire risk reduction, preservation of biodiversity, vibrant resource-based communities and economies, and conservation of our best remaining areas of productive habitat. We commend the USFS for its work to amend the NWFP to reflect contemporary conditions and exigencies, and stand ready to provide technical assistance, collaborative science, and volunteer labor to ensure the Final Amended NWFP is successful.

Respectfully submitted,



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