



March 17, 2025

Regional Forester Jacqueline Buchanan  
Pacific Northwest Region  
U.S. Forest Service  
1220 SW 3rd Avenue  
Portland, OR 97204

**Re: Northwest Forest Plan Amendment Draft Environmental Impact Statement**

Dear Regional Forester Buchanan,

Please accept the following comments on the Northwest Forest Plan Amendment (NWFP) Draft Environmental Impact Statement (DEIS) from the Klamath-Siskiyou Wildlands Center. Our nonprofit organization is supported by several thousand grassroots donors and volunteers, many of which call the Klamath-Siskiyou bioregion of southwestern Oregon and northwestern California home. The landscape of the Klamath-Siskiyou is characterized by big trees, wild rivers, and botanical diversity which are renowned across the continent. Along with local supporters, we have contributors and supporters located in more than 35 states and provinces. This grassroots support is a testament to the international recognition the Klamath-Siskiyou has received as one of just seven Areas of Global Biological Significance via the International Union of Concerned Scientists (IUCN).

For the past four decades, the Klamath-Siskiyou Wildlands Center has supported and organized communities in our region to speak up for restoration and stewardship on more than 8-million acres of public lands. The Klamath-Siskiyou's public lands are managed by agencies like the National Park Service, Bureau of Land Management, and US Forest Service, and since the inception of our organization in 1997, we have relied on the Northwest Forest Plan to help guide agency and land managers' decision-making on these public forests. All of the forests we cover in our region are within the predominantly "dry" forest landscape of the Northwest Forest Plan, including the following:

- 1) Fremont-Winema National Forest
- 2) Klamath National Forest
- 3) Rogue River-Siskiyou National Forest
- 4) Shasta-Trinity National Forest
- 5) Six Rivers National Forest.

Since the 1994 NWFP was implemented, our organization has seen encouraging signs with some forests as the US Forest Service tries to address the impacts of climate change and biodiversity loss. Unfortunately, we are also starting to see the impacts of climate change take hold, and the region has experienced severe droughts, extreme heat domes, and other

severe weather events that have contributed to significant stand-replacing wildfires and the spread of drought-induced disease. This is having a major impact on the future of species like the Northern spotted owl. We see the recent NWFP amendment process as a way to engage various stakeholders like conservationists, Tribes, scientists, and business interests in facilitated discussions to map out the future of these critically important forests that are facing threats because of climate change.

### **Tribal Inclusion**

While our comments reflect some concerns over plan components in the DEIS, we are encouraged to see the agency correct a foundational flaw from the original plan, which omitted and excluded Tribal entities, organizations, and communities from the negotiations. We believe action alternatives in this DEIS correct this failing to varying extents, and we strongly support the inclusion of all Tribal Inclusion plan components in the final amendment.

### **Unplanned Wildland Fire as a Management Opportunity**

The US Forest Service's long-standing fire suppression and fire exclusion policies have significantly altered landscapes and degraded ecosystem and habitats that are nurtured by Native peoples and in turn support Native cultures. The agency tiering the NWFP to Wildfire Crisis Strategy is problematic, especially if fuels reduction for fire suppression continues to dominate the Forest Service fire management, rendering the fire use provision in the amendment pointless.

Controlled burning is one tool in the fire use toolkit that we can rely, but it doesn't really go far enough. We urge the agency to consider ways to allow for unplanned ignition to play its historic beneficial role in western forests, particularly dry fire-prone areas. It is imperative to clearly establish where fires will be allowed to play their natural role. It is also imperative to establish reasonable expectations for fuel treatments near communities. Strategic fire zones, similar to those contemplated in Alternative D, offer a way to allow for landscape level planning that prioritizes fuel treatments where they will have the most benefit—near communities—and are sized such that they are capable of being maintained

### **Dry forest stewardship**

The NWFP proposed action alternative adds volume targets to dry LSR to contribute to economic stability. Adding economic purposes to the LSR is unnecessary to achieve Wildfire Resistance and Resilience desired conditions on the landscape and alternatives should have been analyzed that considered new approaches to “reducing damages and enhancing benefits from wildland fire,” without adding this commercial driver to the LSR. We are concerned that adding timber volume economic purposes to LSR eliminates NFMA's multi-use mandate and renders all of the other values and issues in the NWFP subservient.

The dry forest plan components also lack compelling action to recruit old trees through proactive stewardship. We encourage revised plan directions that provide for the

recruitment of old growth trees in dry forests by requiring the retention of sufficient large trees as appropriate for the forest type to supplement the retention of existing old growth trees in these forests.

Given that the purpose of Late Successional Reserves as large blocks of intact old forest for the persistence of late-successional and old growth obligate species, it is inappropriate to conduct salvage operations for the benefit of “local communities,” which could be read to permit salvage when economically beneficial to those communities. “The NFP states that ‘salvage will not be driven by economic or timber sale program factors.’ NFP Appendix F, F-21.” *Oregon Nat. Res. Council Fund v. Brong*, 2004 WL 2554575, at \*8 (D. Or. Nov. 8, 2004), *aff’d*, 492 F.3d 1120 (9th Cir. 2007).

### **Maintain the focus of Adaptive Management Areas (AMAs)**

KS Wild believes the original intent and focus of AMAs must remain. We are particularly interested in maintaining and keeping the emphasis for all Adaptive Management Areas within the geography of the Northwest Forest Plan, especially those located within the Klamath-Siskiyou bioregion of southwest Oregon and northwest California. At the time of the 1994 Northwest Forest Plan, Adaptive Management Areas were seen as an innovative approach to addressing social, ecological, and economic challenges for many communities transitioning away from timber reliance. Today, when the Northwest Forest Plan amendment process is highlighting the need for adaptive management across all land use allocations, it seems counter to target the one LUA for adaptive management and shift it to a timber management (matrix) emphasis. As noted in the 2024 amendment, “for Adaptive Management Areas, the updated plan direction for Matrix and respective forest type will apply...except for areas also designated as Late-Successional Reserves.”

- **Applegate Adaptive Management Area (277,000+ acres):** The emphasis should be the same as the original: “*Develop and test forest management practices, including partial cutting, prescribed burning, and low impact approaches to forest harvest (e.g., aerial systems) that provide for a broad range of forest values, including late-successional forest and high quality riparian habitat. Late-Successional Reserves are included in the Applegate Adaptive Management Area boundaries.*”

The Applegate AMA is particularly special given that it’s home to the endemic and rare Siskiyou Mountains Salamander (*Plethodon stormi*). Adjusting the management directive here (to emphasize matrix logging) could have devastating impacts on the habitat for Siskiyou Mountain Salamanders. In fact, when the US Fish and Wildlife Service denied the petition to list the Siskiyou Mountain Salamander under the Endangered Species Act, it specifically noted that the population would not necessarily suffer because of the presence and guidance of the adaptive management area. If this area is targeted for more logging under new standards in the amendment, timber harvesting will impact Siskiyou Mountain Salamander habitat and could potentially imperil this rare and endemic salamander species.

- **Goosenest Adaptive Management Area (172,000+ acres):** The emphasis and focus should remain on “*development of ecosystem management approaches, including use of prescribed burning and other silvicultural techniques, for management of pine forests, including objectives related to forest health, production and maintenance of late-successional forest and riparian habitat, and commercial timber production.*”
- **Hayfork Adaptive Management Area (488,000+ acres):** The emphasis and focus should remain on the “*development, testing, and application of forest management practices, including partial cutting, prescribed burning, and low- impact approaches to forest harvest, which provide for a broad range of forest values, including commercial timber production and provision of late-successional and high quality riparian habitat. Maintain identified Late-Successional Reserves....*”

Sincerely,

A handwritten signature in black ink that reads "Michael Dotson". The signature is fluid and cursive, with a long horizontal stroke extending from the end of the name.

Michael Dotson  
Executive Director  
Klamath-Siskiyou Wildlands Center  
Ashland, Oregon