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

Re: Comments on the Northwest Forest Plan Draft Environmental Impact Statement and proposed plan components

Dear Regional Forester Buchanan,

Thank you for the opportunity to comment on the Draft Environmental Impact Statement (DEIS) for the Northwest Forest Plan (NWFP) amendment. On behalf of the Theodore Roosevelt Conservation Partnership (TRCP), I write to express our strong support for a NWFP that sustains healthy, resilient forests through both active and passive management to reduce wildfire risk, maintain fish and wildlife habitat, support outdoor recreation, and provide jobs and wood products needed to fuel the restoration economy and local communities. These valuable public lands can provide wildlife habitat, sustainable forest products, and recreation resources to communities through a strong, balanced forest plan.

Established in 2002, the TRCP is a coalition of hunting, fishing, and conservation groups working together to guarantee all Americans quality places to hunt and fish. The TRCP represents 63 partner organizations and more than 130,000 individual members nationwide, with the mission of conserving fish and wildlife habitat, strengthening funding for conservation, and improving public access for outdoor recreation. The TRCP has a long history of engagement on national forest policy, including through the ongoing NWFP amendment process. We remain consistent with our past technical recommendations and policy positions, and we appreciate that the United States Forest Service (USFS) is incorporating the best available, peer-reviewed scientific research and real-world data into this plan amendment.

The original 1994 NWFP was groundbreaking — a landscape-scale, ecologically driven forest plan that sought to balance resource protection with sustainable timber management. It protected approximately 7.4 million acres of old-growth reserves, slowed the decline of endangered species, and contributed to improved watershed conditions. However, it also significantly reduced forest diversity and available habitat for species dependent on early successional browse, as well as the availability of wood products from public lands, affecting many rural economies within the 24-million-acre planning area. Now, with changing forest conditions, increasing wildfire risks, and evolving socio-economic needs, we support modernizing the NWFP to enhance forest resilience, protect key habitats and older forests, and strengthen the economic well-being of local communities. We appreciate the efforts of the USFS and the Federal Advisory Committee (FAC) to guide this important work.

As the Forest Service updates the NWFP, TRCP urges the agency to build on what has worked and adapt to changed circumstances. In the sections below, we highlight our priority recommendations on wildlife connectivity and big game migration, old-growth forest conservation, wildfire management, resilience, and recreation management, consistent with TRCP's previous input and the best available science.

Wildlife Connectivity and Big Game Migration Corridors

Maintaining and restoring habitat connectivity is a top priority for TRCP. Wide-ranging wildlife such as elk and deer require expansive, unfragmented landscapes to migrate between seasonal ranges and find food, suitable climatic conditions, and secure breeding areas. Big game populations in the Pacific Northwest depend on the ability to move freely across public and private lands – an ecological necessity that also underpins hunting opportunities and rural economies. Unfortunately, habitat fragmentation from development, roads, and other human disturbances has begun to impede these migrations, forcing animals into smaller areas and novel movement patterns with uncertain outcomes. Research in Central Oregon's Crescent Herd Range (Deschutes National Forest), for example, identified that mule deer can travel up to 90 miles between summer and winter ranges, spending up to 95% of their migration in "stopover" habitats that are essential for resting and refueling. If such corridors and stopover areas are disrupted or blocked, even the best-protected winter or summer range will not support healthy herds. In many areas of the Pacific Northwest, increasing development and recreation pressure have already led to declining ungulate populations, suggesting that connectivity loss is a contributing factor.

While we recognize that wildlife connectivity was not a core issue in the NWFP amendment, we believe there are opportunities through this amendment to include concrete measures to conserve wildlife corridors and seasonal habitats. TRCP urges the agency to incorporate a model set of plan components to maintain, restore, and protect migratory habitats for ungulates and other wide-ranging species. We recommend that the final plan explicitly commit to protecting big-game migration routes, winter range, and summer range by utilizing the best available science – for instance, GPS collar data and state wildlife agency observations to map high-priority migration routes and key seasonal use areas – and then designating specific management areas or standards for their conservation. The plan should also include standards, guidelines, and/or desired conditions to limit open road and trail densities in important wildlife habitats and require wildlife-friendly infrastructure (such as highway crossing structures or fence modifications) where feasible. Scientific studies have documented that high road and trail densities negatively affect species like elk, which tend to avoid or abandon areas with excessive disturbance and noise. Wildlife researchers in Colorado have even found that unrestrained trail use during the elk calving season can disturb elk cows and reduce calf survival. Setting measurable route density limits and seasonal motorized use restrictions in sensitive habitats would help minimize these impacts.

Finally, we urge the Forest Service to coordinate closely with state fish and wildlife agencies and Tribal biologists in implementing these connectivity provisions, since these partners have on-the-ground data and management authority over wildlife.

Incorporation of indigenous knowledge

More than 80 Tribal nations are located within planning area, and their deep connection to the land has long contributed to the resilience of fish and wildlife habitats and forest ecosystems. The NWFP presents an opportunity to strengthen land management by incorporating Indigenous knowledge and active stewardship practices, ensuring a more holistic and effective approach to conservation. Tribes have managed these landscapes since time immemorial, using fire and other land management techniques to

sustain biodiversity and ecosystem health. By working in partnership with Tribal nations, the U.S. Forest Service can integrate traditional ecological knowledge alongside contemporary science to enhance habitat conservation, wildfire resilience, and forest sustainability. We support efforts to formally include Tribal knowledge and active stewardship components in the final NWFP, recognizing that collaboration with Tribes will lead to better-informed, more adaptive land management strategies.

Conserving Forest Diversity across Successional Stages

Conserving late-seral forests is essential to meet the recovery goals of spotted owls, marbled murrelets and species reliant on older forests. At the same time, the TRCP supports managing our forests across all seral stages. This includes mature and old growth as well as early seral and mid seral stages that are important for other native fish and wildlife habitat and first foods such as huckleberries and camas. These older forests provide irreplaceable benefits. They store vast amounts of carbon, and support complex, essential habitats for countless species. Stands of large, old trees also tend to be more resilient to wildfire and drought, given their deep root systems and thicker bark, which help them survive disturbances that might kill younger trees. Protecting existing mature and old-growth forests and allowing more forests to grow into old-growth status is therefore a smart strategy for wildlife conservation.

TRCP recognizes that a diverse mosaic of forest ages, from early seral to mature and old growth, is necessary to sustain the full suite of wildlife and to foster resilience. Research shows that heterogeneous forest landscapes promote biodiversity by supporting species with different habitat requirements (Littlefield & D'Amato, 2022). While conserving old growth remains a priority, the Forest Service must also provide for species that depend on young forests and early successional habitats, such as ruffed grouse, black-tailed deer, and various pollinators (Nagel et al., 2017).

While conserving old growth, the Forest Service should also provide for species that depend on young forests and early successional habitats. In older dry forests, the best available science clearly shows the need to actively manage these forests to reduce the abundance of fuel buildup that has accumulated since fire suppression policies began in the early 20th century. The absence of low-intensity natural fires has led to unnaturally dense stands, increasing the risk of high-severity wildfires (Halofsky et al., 2020). We support the standards, guidelines, and desired conditions within the NWFP amendment that address these overstocked forests by promoting mechanical thinning and prescribed burning, both of which have been shown to restore historical fire regimes and reduce catastrophic wildfire risk (Hogan et al., 2024).

Active restoration can create more diverse habitats and accelerate the development of structural complexity in second-growth forests. Research suggests that strategic timber harvest and other types of active management can enhance late-seral characteristics, like multi-layered canopies, large-diameter trees, and biodiverse understories while also maintaining near-term benefits for game species like grouse, deer and elk (Sawyer & Kauffman, 2011).

Wildfire Management and Forest Resilience

The increasing frequency and severity of wildfires across the western United States presents a growing threat to forest ecosystems, wildlife, and human communities. In the NWFP region, uncharacteristic wildfires fueled by decades of fire suppression increasing temperatures, and prolonged drought are altering landscapes and threatening habitat connectivity. Uncontrolled wildfires can lead to extensive habitat destruction, soil erosion, and water quality degradation, jeopardizing both ecological integrity and public safety.

To address these challenges, the NWFP must prioritize proactive wildfire risk reduction through science-based forest management strategies. This includes a combination of prescribed burning, mechanical thinning, and fuel breaks to reduce hazardous fuels and promote fire-resilient ecosystems. Research has shown that the application of low-intensity prescribed fires mimics historical natural fire cycles, reducing the likelihood of catastrophic wildfires while improving soil health and enhancing biodiversity. Mechanical thinning in overstocked forests can create fire-adapted landscapes that provide crucial habitat while lowering wildfire risk.

Additionally, post-fire recovery efforts must be a key component of the NWFP. In the aftermath of severe wildfires, targeted reforestation and habitat restoration projects should be implemented in priority locations to aid in ecosystem recovery. This includes reseeding with species well-adapted to natural variability, stabilizing slopes to prevent erosion, and ensuring riparian buffers remain intact for water quality protection. Fire management strategies should also incorporate traditional ecological knowledge from Indigenous communities, whose land stewardship practices have helped maintain resilient landscapes for centuries. In matrix lands and in some situations on other land use allocations (LUA) such as adaptive management areas or other LUAs near roads and/or within wildland urban interface areas or near communities, salvage harvest post disturbance should be encouraged.

We urge the Forest Service to work collaboratively with state and tribal governments, conservation organizations, private landowners, and local communities to develop and implement comprehensive wildfire management plans. With a combination of proactive fuels management, climate-informed restoration, thoughtful salvage management, and strategic fire response, the NWFP can enhance forest resilience while protecting critical wildlife habitat, rural economies, and ensure resilient and safe local communities.

Variability and Resilience in Natural Systems

Increasing variability in weather patterns is reshaping forest ecosystems across the Pacific Northwest, bringing higher temperatures, shifting precipitation patterns, and more extreme weather events. These changes are affecting wildlife migration patterns, increasing the spread of invasive species, and amplifying the risk of drought and wildfire. As forests adapt to these new conditions, it is imperative that the NWFP incorporates resilience strategies and active management components into its framework to ensure long-term sustainability and to reduce impacts from new stressors and threats such as wildfire, insects and disease.

One of the most effective ways to enhance ecosystem resilience is by maintaining and restoring ecosystem connectivity. By protecting large, contiguous landscapes and key wildlife corridors, species will be better equipped to shift their ranges in response to changing environmental conditions. This requires targeted land management strategies that prioritize connectivity between habitats, ensuring that forests remain functional across a range of climatic scenarios.

Additionally, reforestation with species resilient to changing conditions can play a critical role in enhancing forest resilience. Studies indicate that diverse, structurally complex forests are more adaptable to weather variability and extreme events. Reforestation efforts should incorporate a mix of native species that can withstand drought, fire, and pests while still providing high-quality habitat for wildlife.

Water security is another critical component of forest resilience. As varying weather patterns disrupt precipitation patterns, ensuring the integrity of riparian ecosystems and headwater streams is essential for maintaining watershed health. The NWFP should prioritize watershed restoration projects that improve water retention, reduce erosion, and enhance aquatic habitat for fish and other aquatic species.

We encourage the Forest Service to implement forest management strategies that enhance forest resilience, reduce wildfire risks, and secure rural economic opportunities. By proactively investing in active forest management, including selective thinning and restoration projects, the Forest Service can simultaneously increase timber productivity and enhance wildlife habitats, safeguard migration corridors, and support outdoor recreation economies, leveraging best-available conservation practices, to foster healthy forests and abundant wildlife populations that sustain hunting, fishing, and tourism activities essential to rural economies. Integrating these management approaches can generate jobs, reduce federal expenditures associated with catastrophic wildfires, and promote long-term forest productivity, thereby serving the administration's objectives for multiple use, economic growth, rural prosperity, and resource security.

Recreation and Public Access

Outdoor recreation is an essential component of the public lands experience, contributing to local economies, public health, and conservation awareness. The NWFP area provides world-class opportunities for hunting, fishing, hiking, camping, and wildlife viewing, drawing millions of visitors each year. However, increased recreation demand—particularly in sensitive wildlife habitats—requires sustainable management strategies to minimize impacts while maintaining access.

TRCP supports a NWFP that prioritizes sustainable outdoor recreation planning, ensuring that public lands remain accessible while mitigating disturbances to wildlife. This includes establishing seasonal closures in critical habitats, such as winter range and calving areas, to reduce stress on big game populations. Additionally, limiting off-road vehicle use in areas with fragile ecosystems can prevent habitat degradation and maintain migration corridors.

Investments in recreational infrastructure can also help mitigate impacts by guiding public use toward designated trails, campsites, and access points that are designed to withstand high visitation levels. Interpretive signage and public education campaigns can foster responsible recreation practices that align with conservation goals.

Furthermore, the NWFP should emphasize collaborative recreation planning that involves hunters, anglers, conservation groups, and local communities to develop management solutions that balance recreation with ecosystem health. Funding mechanisms such as the Land and Water Conservation Fund should be leveraged to enhance both conservation and recreation opportunities in the NWFP region.

Recreation management remains a top-level priority in the region, the NWFP can and should ensure that outdoor enthusiasts continue to enjoy high-quality experiences while maintaining the productivity and ecological integrity of public lands.

Survey and Manage

The Survey and Manage program for 350 species was added to the 1994 Plan as a mitigation measure for the continued logging of late-successional and old growth forests in the Matrix. When the NWFP was authorized 30 years ago, little was known or understood about many of these species and their preferred habitats or populations. Since that time, subsequent research has illuminated much about the population and habitat needs for several species. Many of these protocols have caused significant contractions of needed vegetation management project, regardless of LUA or project objectives. Given that the NWFP amendment will conserve late successional and old growth forests in the Matrix and all other LUAs, we do not believe it remains necessary.

We suggest that the Forest Service should remove Survey and Manage protocols and classify many of these species as candidates for Species of Conservation Concern outside of the forest plan amendment process.

Comments on plan comments within the Proposed Action in Volume 2 of the DEIS

TRIBAL-FORSTW-ALL-GDL-03 *To allow tribal access to first foods and culturally significant botanical species, **collection of special forest products should not be permitted or should be limited** if, after consultation with the relevant tribal governing body, national forests in the Northwest Forest Plan area determine it may result in significantly interfering with a Tribe's access to culturally important resources. If access or gathering is authorized, such activities should minimize conflicts with the exercise of treaty and other protected tribal rights protected by federal law.*

> TRCP supports Tribal access to first foods. We also support the state allocation of fish and wildlife resources to other members of the public. While TRCP supports restriction of commercial uses that could limit Tribal access to culturally important food resources, we encourage the NWFP to focus its intention on management practices that increase the availability of plant, fish, and wildlife food resources on the landscape for both Tribal members and the public to utilize for personal consumption. By growing the overall pie, we can provide

more resources for everyone to share, which will help eliminate the perception that we need to pick winners and losers.

CLIMATE-DC-05 *The transportation network is resilient to the effects of climate change, including the ability to accommodate increased erosion, runoff and peak flows that may exceed historic streamflow events. Roads and trails are located in low-risk areas and do not impair fish and wildlife habitat connectivity. Culverts and stream crossings are appropriately sized to accommodate expected peak flows.*

CLIMATE-DC-XX *Roads do not disrupt hydrologic or aquatic habitat function.*

The insertion into CLIMATE-DC-05 sets a Desired Condition that roads do not impair fish and wildlife habitat connectivity or movement, which are objectives of the Forest Service's 2012 Planning Rule. The intent of the added Desired Condition is to ensure that roads do not impair ecological integrity of aquatic systems.

Comments on plan comments within the Alternative D in Volume 2 of the DEIS

We support the inclusion of the following aspects of Alternative D in the final amendment.

The approach within Alternative D divides the landscape into four strategic fire management zones reflecting progressively decreasing risk to communities. Such a strategy, in which objectives and fire response are identified within discreet zones in advance of an incident, is a sound approach to wildfire management and the TRCP supports their inclusion in the final EIS.

FORSTW-LSR-PMA-D, which moves approval of LSR Assessments to the Forest Supervisor rather than the Regional Ecosystem Office. This change would streamline important proactive stewardship projects needed in LSRs while still enabling communication with the regional office.

FIRE-ALL-OBJ-01D over FIRE-ALL-OBJ-01B because the former would proactively steward more acres (4.95 million acres vs. 2.65 million acres) across all land use allocations than the latter. Given the urgency of the need to mitigate and adapt to changing environmental conditions, we believe restoring more acres is appropriate, in addition to the socioeconomic benefits an increased pace of stewardship provide to rural communities.

TRCP also suggests the inclusion of an objective in the final amendment that seeks to accomplish an appropriate level of maintenance treatments in areas that have been restored. We recognize that forest restoration and proactive stewardship are often not a one-time event, and that ongoing maintenance treatments – particularly in dry forests – may be required.

Conclusion

Thank you for the opportunity to provide comments on the proposed amendment to the Northwest Forest Plan. The Forest Service is to be commended on the collaborative spirit in which the agency worked with the FAC, Tribes, sportsmen and women and others to develop the DEIS and alternatives. **We encourage the USFS to adopt a final decision that closely follows the proposed actions while incorporating additional considerations under alternative D related to increasing the pace and scale of forest stewardship to reduce the risk of uncharacteristic wildfires now and into the future.**

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