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First name: Karen
Last name: Hans
Organization: Coop - Oregon Department of Fish and Wildlife
Title:
Comments: Oregon Department of Fish and Wildlife

Habitat Division 4034 Fairview Industrial Dr SE

September 10, 2024

U.S. Department of Agriculture Salem, OR 97302

503-947-6044

FAX: 503-947-6042

dfw.state.or.us

Chief Randy Moore Director (630)

U.S. Forest Service

1400 Independence Ave. SW Washington, D.C. 20250-0003

Submitted electronically through the Federal eRulemaking Portal:
<https://cara.fs2c.usda.gov/Public//CommentInput?Project=65356>

Dear Chief Moore,

The Oregon Department of Fish and Wildlife (ODFW) appreciates the opportunity to provide comment on the Amendments to Land Management Plans to Address Old-Growth Forests Across the National Forest System Draft Environmental Impact Statement (draft EIS).

ODFW reviewed the draft EIS for consistency with the State's Wildlife Policy (Oregon Revised Statute [ORS] 496.012) that wildlife shall be managed to prevent serious depletion of any indigenous species and to provide the optimum recreational and aesthetic benefits for present and future generations of the citizens of this state. In furtherance of the state of Oregon's wildlife policy, ODFW's Fish and Wildlife Habitat Mitigation Policy (Oregon Administrative Rule 635 Division 415) sets guidelines to avoid, minimize or mitigate the impact from a development action on fish and wildlife habitat and establishes mitigation goals dependent on the habitat functions and values.

According to the draft Environmental Impact Statement (draft EIS), the Forest Service seeks to establish consistent plan direction to foster ecologically appropriate management across the National Forest System. This effort will be undertaken by maintaining and developing old-growth forest conditions while improving and expanding their abundance and distribution and protecting them from the increasing threats posed by climate change, wildfire, insects and disease, encroachment pressures from urban development, and other potential stressors, within the context of the National Forest System's multiple-use mandate. The proposed action also includes a management approach to direct the development of a place-based strategy. The intent is to create a new Adaptive Strategy for Old-Growth Forest Conservation for each National Forest Plan based on geographically relevant data/information or adopt an already existing strategy that meets this intent.

ODFW supports the intent of amending all land management plans for units of the National Forest System with this direction. Management of National Forest lands has bearing on the ODFW's ability to achieve its mission, and thus the agency's comments focus on land management policies and approaches that support healthy landscapes and resilient ecosystems for Oregon's fish and wildlife resources. Below, ODFW has summarized recommendations to ensure that proceeding with these amendments would avoid and minimize negative impacts to fish and wildlife, while seeking to ensure that co-benefits for biodiversity, communities, carbon sequestration, and forest resilience can be realized.

ODFW's recommendations are summarized in the categories of management of mature and old growth forests, invasive species, climate change, fire resiliency, connectivity, early seral and non-forested habitats, monitoring, and Tribal inclusion.

Recommendations

ODFW supports the conservation of all remnant, mature old growth forest habitat and managing remaining forests to retain their specific characteristics as mature old growth habitat into the future. This policy should apply to all mature old growth habitat types regardless of tree species or commercial value.

ODFW supports all of the proposed actions to promote ecologically focused forest management, bring Indigenous Knowledge to forest stewardship, use geographically informed adaptive strategies that support co-stewardship, and establish a national monitoring framework. The agency also encourages active management of these forests for fish and wildlife habitats. The need for active management that returns fire-prone old growth

forests to resiliency is especially important in the drier forest types and riparian areas.

ODFW supports thinning operations in old growth forests when the goal is to restore fire resiliency and to promote the development of large trees and old growth conditions. Thinning operations have the potential to negatively impact habitats for fish and wildlife if measures are not adequately considered to avoid, minimize, and mitigate those impacts. In order to minimize the potential for harm to fish and wildlife, ODFW recommends the Forest Service involve Tribes and state agencies in the development of forest thinning projects in the early planning stages.

1. Invasive species

The draft EIS does not provide any direct recommendations in the Proposed Action or Plan Components on how to manage for invasive species. However, nonnative invasive species are a key threat to ecological integrity of old growth forests and effective management must address this critical issue. ODFW supports the aggressive treatment of invasive species in old growth forests, including riparian areas, to protect native forest species. ODFW recommends the Forest Service include clear management direction for addressing the threat of nonnative, invasive species to the ecological integrity of old growth forests.

2. Climate change

ODFW supports the Proposed Actions to address threats from climate change by promoting climate-adapted species assemblages in areas of changing climatic conditions. The Forest Service should also use proactive stewardship, including the retention, recruitment, natural succession, and connectivity of old-growth forest conditions such that future conditions are resilient and adaptable to stressors and likely future environments. ODFW recognizes that carbon stored in old-growth conditions contributes to the long-term carbon storage, stability, and

resiliency of forest carbon across the National Forest System. Additionally, ODFW understands the importance of developing additional proactive climate-informed stewardship, conservation, and management approaches as needed to effectively achieve the desired conditions, standards, and guidelines in the amendment.

In 2020, ODFW adopted its Climate and Ocean Policy to provide guidance to the agency on addressing the effects of climate change to fish and wildlife in Oregon. One of the goals of the policy is to provide leadership toward a coordinated statewide and regional response that minimizes the impacts of changing climate and ocean conditions on Oregon's natural resources and the communities, culture, and economies reliant on them, and allows for sustainable use of natural resources in the future. ODFW has been at the forefront of research, monitoring, and management policies related to understanding and addressing the effects of climate change on Oregon's native biota. Given the agency's wealth of knowledge and experience, ODFW recommends the Forest Service consult with the agency on development of actions that address the effects of climate change on native species of the National Forests in Oregon such as planning for and implementing habitat connectivity between old growth habitats.

3. Fire Resiliency

ODFW supports the restoration of ecological function and resilience to forests that have been negatively affected by decades of fire suppression and certain timber management practices. The standard methods that promote fire resiliency (e.g., prescribed burns, thinning) are also likely to reduce homogeneity on the landscape and promote understory growth and forage for a variety of wildlife species. ODFW supports forest management practices to reduce fuel loads in old growth forests, only if those treatments avoid and minimize short- and long-term impacts to sensitive and special status wildlife species.

To avoid adverse impacts to fish and wildlife habitats when implementing fuel treatments (e.g., forest thinning, prescribed fire), ODFW recommends the Forest Service consult with ODFW and Tribes to plan treatments that avoid adverse effects to fish and wildlife habitats. If adverse impacts to fish and wildlife habitats are unavoidable, the Forest Service should work with ODFW to mitigate for the loss of habitats by creating replacement habitats to benefit the affected fish and wildlife.

4. Refugia and Connectivity

The draft EIS proposes to enhance landscape and patch connectivity between isolated old-growth patches to retain and promote the development of old growth conditions in areas of likely climate refugia that are projected to have the inherent capability to sustain old growth conditions. ODFW is supportive of improving habitat connectivity for wildlife movement and climate adaptation.

ODFW engaged in a statewide initiative to map critical fish and wildlife movement corridors. Through the Oregon Connectivity and Assessment Mapping Project, ODFW mapped Priority Wildlife Connectivity Areas (PWCAs) to provide information on the parts of the landscape with the highest overall value for facilitating wildlife movement. The network of PWCAs serves as a science-based, informational tool to support planning for and implementation of habitat enhancement, restoration, conservation, transportation mitigation, land-use, and development efforts. Combined with a comprehensive fish passage database, ODFW has a thorough accounting of high use movement corridors for fish and wildlife. Like ODFW, many states and Tribes recognize the value of connectivity and refugia areas and are engaged in efforts to identify

and map critical movement corridors. Given this local knowledge of fish and wildlife ecology, ODFW recommends that the Forest Service consult with state agencies and Tribes in identifying and understanding current movement corridors and to develop management actions to maintain, enhance, and increase connectivity areas.

In order to meet the draft EIS's objective to provide climate refugia in old growth forests, ODFW recommends the Forest Service prioritize the identification and mapping of climate refugia areas on National Forest and adjacent lands, prioritize refugia in dry forests for restoration treatment especially in riparian areas, and use adaptive

management to respond to climate threats in real time to provide connected refugia, migration corridors as conditions change. ODFW has data and models to support the Forest Service in this mapping effort.

5. Early Seral and Other Habitats

Many species of birds, mammals, amphibians, and reptiles that are considered dependent on old growth forest habitats also use early seral and non-forested habitats for nesting, roosting, or foraging. The overall health of old growth forests and the species that depend on them is entwined with all forest habitat types. Early seral vegetation habitats have declined significantly on National Forest lands in Oregon during the past 25 years. Due to the lack of early seral habitats, elk and deer forage quality and quantity are poor and use has diminished on Oregon's National Forest lands. The decline of habitat quality on federal lands is a limiting factor in sustaining viable ungulate populations. It also causes elk to move onto private lands resulting in landowner conflicts. To improve forage resources and use of habitat by coastal ungulates such as Roosevelt elk and black-tailed deer, sufficiently recurrent disturbance management must be incorporated into long-term forest planning on federal lands.

While the draft EIS focuses on mature and old growth forests, ODFW recommends a landscape scale approach that also emphasizes creation and maintenance of early successional and non-forested habitats such as meadows, wetlands, hardwood woodlands, and grasslands as these habitat features/types have high wildlife value. Many historic meadows have experienced conifer encroachment due to past fire suppression. Early seral conditions and forest openings are highly critical for numerous taxa including invertebrates, birds, amphibians, reptiles, and mammals considered dependent on old growth. Early seral conditions also support deer and elk, the primary prey of the federally threatened gray wolf in Oregon. Strategic alignment of early seral habitats and meadows can also create fire protection for old growth forest stands, helping meet fire resiliency goals as well.

In addition to early seral habitats, oak woodlands are a priority habitat in Oregon highlighted in the Oregon Conservation Strategy. ODFW recommends retaining existing mature and old growth oak stands and trees where they occur and implementing management actions (e.g., thinning of encroaching conifers, thinning of certain oak trees) to increase resistance to wildfire and to promote growth of mid-seral oak stands/trees.

6. Monitoring

A key part of the draft EIS is to establish a national monitoring framework to track trends and distribution patterns of old-growth forests for inventory, evaluation, assessment, and adaptive management purposes and to provide for consistent and effective monitoring of old-growth forest characteristics to inform adaptive management. A robust and detailed monitoring strategy, supplied by appropriate research and directly connected to an adaptive management feedback loop is essential to adaptive management.

Adequate funding and staff capacity are essential to a successful monitoring program. ODFW recommends the Forest Service document a commitment to fund and implement the monitoring strategy and develop a monitoring/evaluation strategy through interagency coordination. Monitoring objectives should be prioritized and

set by interagency and Tribal needs using multi-scale analyses, including regional assessments, basin assessments, watershed analysis, and project analysis. Monitoring of thinning and other forest management activities projects should also include short- and long-term effects on sensitive wildlife species to help develop a better understanding of how active management influences species persistence.

7. Tribal Inclusion

According to the draft EIS, implementation of policies should enable co-stewardship, including for cultural burning, prescribed fire, and other activities, and should occur in consultation with Tribes to fulfill treaty obligations and general trust responsibilities. This will require effective collaboration and integration of place-based Indigenous Knowledge and Western science to inform and prioritize the restoration and conservation of all forest habitat types to provide cultural, medicinal, and spiritual forest plants and animals important to local tribes.

ODFW supports the Forest Service's efforts for meaningful and sincere Tribal inclusion when developing forest management policies. ODFW recognizes the importance of consulting with Tribes and values their traditional ecological knowledge and conservation partnership. ODFW has recently entered into several agreements with federally recognized tribes in Oregon for the cooperative management of fish and wildlife populations.

Conclusion

ODFW has a long history of positive working relationships with the Forest Service, and we look forward to continued work on this process and other partnerships. Should you have any questions or seek additional coordination with ODFW on our feedback or your proposal, please contact Janelle St. Pierre, Land Resources Program Manager, at 503-383-6908 or Janelle.M.StPierre@odfw.oregon.gov

Sincerely,

Sarah Reif

ODFW Habitat Division Administrator

ATTACHMENT: USFS Old Growth Draft EIS_ODFW Comments_09.11.24.pdf - this is the same content that is coded in the text box; it was also included as an attachment