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Comments: March 11, 2025

U.S. Department of Agriculture Chief Tom Schultz Director

U.S. Forest Service

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

Dear Chief Schultz,

I am writing to express my appreciation for the opportunity for the State of Oregon to comment on the U.S. Forest Service[rsquo]s Region 5 and Region 6; California, Oregon, and Washington; Forest Plan Amendment for Planning and Management of Northwest Forests Within the Range of the Northern Spotted Owl (NWFP Amendment) draft Environmental Impact Statement (89 FR 90280 EIS No. 20240208). The State values the Forest Service's continued efforts to engage with stakeholders, including state and local governments, in developing policies that affect our natural resources and communities. The proposed NWFP Amendment promotes a sustainable forest management approach that delicately balances active management for wildfire risk reduction and forest resilience with preservation of old growth stands and other ecologically important areas. Oregon generally supports this approach and suggests areas for improvement in the attached comments.

Oregon has a vested interest in the proposed amendments, as our state includes significant portions of the national forests under consideration. We recognize that the Forest Service's proposed amendments aim to enhance wildfire resilience, adapt to future climate conditions to ensure resilient forests for the long-term, improve ecological conditions related to old-growth forests, and support local economies[mdash]all of which align with Oregon[rsquo]s priorities for sustainable land management. I would like to underscore the importance of considering the recommendations provided by Oregon[rsquo]s state agencies, particularly the Oregon Department of Fish and Wildlife and the Oregon Department of Forestry included herein. Their expertise in land management, wildlife habitat protection, and forest resilience will help ensure that the proposed amendments most effectively balance ecological restoration with economic and community needs. I encourage you to carefully review and incorporate their recommendations to the extent possible.

Thank you again for the opportunity to participate in this critical process. We look forward to continuing to work with the Forest Service to develop solutions that will improve forest health and support Oregon[rsquo]s communities and natural resources for generations to come.

Sincerely,

Governor []

Attachments:

Oregon Department of Fish and Wildlife Comments Oregon Department of Forestry Comments

March 3, 2025U.S. Department of AgricultureSalem, OR 97302503-947-6044FAX: 503-947-6042dfw.state.or.us

Chief Tom Schultz Director

U.S. Forest Service

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

Submitted electronically through the Federal eRulemaking Portal:

RE: Region 5 and Region 6; California, Oregon, and Washington; Forest Plan Amendment for Planning and Management of Northwest Forests Within the Range of the Northern Spotted Owl Draft Environmental Impact Statement

Dear Chief Schultz,

The Oregon Department of Fish and Wildlife (ODFW or agency) appreciates the opportunity to provide comment on the Region 5 and Region 6; California, Oregon, and Washington; Forest Plan Amendment for Planning and Management of Northwest Forests Within the Range of the Northern Spotted Owl (NWFP Amendment) draft Environmental Impact Statement (dEIS) (89 FR 90280 EIS No. 20240208).

It is the policy of the State of Oregon (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[rsquo]s wildlife policy, ODFW[rsquo]s Fish and WildlifeHabitatMitigation 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. ODFW[rsquo]s Habitat Division leads proactive, focused, and consistent efforts to protect, restore, and enhance

habitat for Oregon[rsquo]s fish and wildlife.

The dEIS identifies and analyzes how amending the Northwest Forest Plan (NWFP) will affect seven interrelated issues:

1. Incorporation of Indigenous Knowledge and Increase Tribal Engagement;
2. Forest Stewardship;
3. Fire Resistance and Resilience;

1. Biological Resources;
2. Climate Change;
3. Air Quality;
4. Sustainability of Regional Communities.

The dEIS proposes Standards, Guidelines, Desired Conditions, Objectives, and Management Approaches (plan components) to implement changes to forest management practices to address these seven issues.

ODFW concurs that changing ecological and social conditions and substantial new information supports the need for an amendment to the Northwest Forest Plan. In general, ODFW supports amending the NWFP in these seven areas.

Recommendations

1. Incorporation of Indigenous Knowledge and Increase Tribal Engagement (TRIBAL-AG- STD-01, TRIBAL-BIO-DC-01)

According to the dEIS, the NWFP Amendment intends to enable co-stewardship for cultural burning, prescribed fire, and other activities, that will be developed 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 management policies to guide the restoration and conservation of all forest habitat types to provide cultural, medicinal, and spiritually relevant forest plants and animals important to local tribes.

The Indigenous peoples of the Pacific Northwest have actively managed habitat using fire to promote important plant and wildlife species since time immemorial. Collaborative habitat management with Oregon[rsquo]s federally recognized Tribes is critical and must allow for creation of early seral habitat that promotes healthy populations of culturally important species including deer, elk, and foraged foods such as huckleberries. Cooperative management that promotes creation of forest openings and early seral habitats will benefit

Indigenous and non- Indigenous communities by sustaining healthy populations of culturally important species on tribal and federally managed lands.

ODFW fully supports the Forest Service[rsquo]s efforts for meaningful and sincere Tribal relationships when developing forest management policies. ODFW recognizes the importance of consulting with Tribes and values their Indigenous 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. ODFW recommends the Forest Service engage in a greater inclusion of Indigenous Knowledge into federal forest management in this plan amendment and throughout implementation of forest management actions.

1. Forest Stewardship

Matrix and Adaptive Management Areas (FORSTW-MTX-MOI-DC, FORSTW-MTX-MOI- GDL-01, FORSTW-MTX-MOI-GDL-(FORSTW-MTX-MOI-GDL-02)

ODFW supports plan components in the dEIS that will set stand age in the Moist Matrix and Adaptive Management Areas (AMA) for Old Growth (origin date 1825) and Mature (origin state 1905) forests and a tree age of 150 years in dry side forests. Setting a definitive criterion for identifying these forest types will provide clarity to the Forest Service staff for forest stewardship activities. Furthermore, ODFW recommends that this policy should apply to all Mature and Old Growth Forest habitat types such as Oregon White Oak.

Late Successional Reserves (FORSTW-LSR-MOI-DC, FORSTW-LSR-MOI-STD-01-B) The dEIS also proposes to raise the stand age for active management in the Late Successional Reserves (LSR) from 80 to 120 years old. While ODFW does not take a position on this proposed change in stand age, the agency does support increasing active management of LSR especially in younger plantation forests. Monoculture Douglas fir plantations in the LSR lack the tree species and habitat diversity to support the host of native flora and fauna historically present. ODFW supports the Forest Service taking an active management approach to thin plantations, open meadows, and plant a range of native tree and shrubs.

Old Growth and Mature Forests in Matrix and AMAs (FORSTW-MTX-MOI-STD-01-B,FORST-ALL-DRY-STD-01-B FORSTW-MTX-MOI-GDL) [ndash]

ODFW supports Forest Service policy that removes Old Growth forest from commercial timber harvest in the Matix and AMAs and will only use timber harvest in Mature forests for restoring Ecological Integrity. While maintaining these forest types is important for dependent species, the agency also recognizes the need for, and encourages, active management of these forests for overall ecosystem health. This need for active management to return fire-prone Old Growth and Mature forests to resiliency is especially important in the drier forest types and riparian areas. ODFW supports thinning operations in Old Growth and Mature forests only when the goal is to restore a stand to its historic density conditions and promote the development of large trees and old growth conditions. To minimize the potential for harm to fish and wildlife, ODFW recommends the Forest Service involve local Tribes and state agencies in the development of forest thinning projects in the early planning stages.

Salvage after Disturbance (FORSTW-LSR-MOI-STD-02, FORST-ALL-DRY-GDL 03) ODFW supports prohibiting salvage in Moist LSRs except for reasons of public safety or Tribal stewardship. Leaving burned or downed trees to decay naturally will provide for wildlife habitat (snags and downed logs) as well as fertilize and condition the soil for future forests. In dry forest LSR, ODFW support allowing salvage to the extent needed to reduce fuel loading created by burned or downed trees. Dry forest types in Oregon are mostly overstocked above historical conditions with small trees. When burned or downed, this excess fuel load, if not salvaged, will create undue risk from a future fire. ODFW also supports the retention of some larger trees and downed logs from salvage in the dry forests for use as wildlife habitat.

Early seral habitats (FORSTW-ALL-DC-06)

ODFW supports plan components that recognize the need for a variety of habitats in Late Successional Reserves (LSR). ODFW is concerned that national forest made up of primarily LSR will lack the multiple seral and meadow habitats critical to many wildlife species. For example, the Pacific fisher and the endangered Coastal marten are not dependent on old growth alone but rather habitat structures commonly associated with complex log structures and snags, which can be created in forests in a variety of age classes. In addition to Pacific fisher and Coastal marten, 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 and Mature 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 especially in LSR. Due to the lack of early seral habitats, elk forage quality and quantity are poor, and population densities have dropped on Oregon[rsquo]s National Forest lands. The decline of this habitat is a limiting factor in sustaining viable ungulate populations. It also causes elk to move onto private lands resulting in potential landowner conflicts. To improve forage resources and population densities of coastal ungulates such as Roosevelt elk and black-tailed deer, sufficiently recurrent disturbance management should be incorporated into long-term forest planning on federal lands.

ODFW supports plan components that direct the Forest Service to take a landscape scale approach that emphasizes creation and maintenance of early successional and non-forested habitats such as meadows, wetlands, hardwood woodlands, and grasslands in all Land Use Allocations 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 forest types.

Oak habitats (FORSTW-ALL-GDL-03, FORSTW-LSR-MOI-DC-01, FORSTW-ALL-DRY-

DC-07) - In addition to early seral habitats in conifer forests, oak woodlands are a priority habitat in Oregon highlighted in the State Wildlife Action Plan (formerly 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, and thinning for oak stand health to increase resistance to wildfire and to promote growth of mid-seral oak stands/trees.

1. Fire Resistance and resilience

Restoring historic fire regimes (CLIMATE-DC-01, FORSTW-ALL-DC-07)

ODFW supports the restoration of ecological function and resilience to forests that have been negatively affected by decades of fire suppression, exclusion of Indigenous burning practices, and certain timber management practices. The standard methods that promote fire resiliency (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 especially in the dry side forests. However, the Forest Service must make every effort that these treatments avoid and minimize short and long-term impacts to sensitive and special status wildlife species. ODFW recommends focusing on returning forests to fire regimes that support their historic range of variation and that have ecological benefits beyond simply reducing the risk of wildfire. Using Indigenous Knowledge for prescribed fire plans and landscape level assessment of allowing natural fire to occur, when they have the potential for significant ecological benefits, will help move National Forest lands towards more fire resilient conditions.

Invasive species (FIRE-ALL-GDL-D-04, FIRE-ALL-GOAL-D-10)

ODFW considers invasive nonnative species a key threat to ecological integrity of all of Oregon[rsquo]s native habitat types and the Forest Service must have an effect management plan to address this critical issue. ODFW supports all plan components in the dEIS directing the Forest Service to take strategic actions to treat invasive nonnative species, both plants and animals, to protect all habitats on national forest lands in Oregon.

1. Biological Resources

Northern Spotted Owls (FORESTW-ALL-GOAL-02)

ODFW supports the Standards and Guidelines in the Northwest Forest Plan intended to protect habitats essential to the Northern spotted owl including:

Known Spotted Owl Activity Centers - This standard and guideline applies to known spotted owl activity centers that are not protected by Congressionally Reserved Areas, Late- Successional Reserves, Riparian Reserves, Managed Late-Successional Areas, or Administratively Withdrawn Areas. One hundred acres of the best northern spotted owl habitat will be retained as close to the nest site or owl activity center as possible for all known (as of January 1, 1994) spotted owl activity centers located on federal lands in the matrix and Adaptive Management Areas. This is intended to preserve an intensively used portion of the breeding season home range. "Activity center" is defined as an area of concentrated activity of either a pair of spotted owls or a territorial single owl. Management around this area will be designed to reduce risks of natural disturbance.

In the dEIS, Alternative B does not include any new plan components regarding northern spotted owl home ranges. However, Alternative C and D do have provisions regarding the amount of suitable habitat maintained.

Alternative C uses [ldquo]an amount equal to the median amount of habitat currently observed in home ranges with the province[rdquo] while Alternative D uses [ldquo]an amount reflective of a range of historic conditions within the inherent capability of the landscape[hellip][rdquo] ODFW finds the current NWFP has adequate Standards & Guidelines to provide protections to northern spotted owl habitats especially when coupled with the US Fish and Wildlife Service[rsquo]s Revised Recovery Plan for the Northern Spotted Owl (Strix occidentalis caurina) and the agency does not see a need for more complicated provisions. However, ODFW does believe that, regardless of the amount of quality habitat provided, northern spotted owls will struggle to persist in the presence of barred owls.

Barred Owl (FORESTW-ALL-GOAL-01) [ndash] Managing the barred owl issue in the NWFP area is imperative to the continued survival of the norther spotted owl. ODFW recognizes the magnitude of impact that barred owls have on Oregon[rsquo]s native wildlife including the northern spotted owl and supports actions that help to preserve the integrity of native ecosystems in Oregon. Implementation of the US Fish and Wildlife Service[rsquo]s Final Barred Owl Management Strategy by the Forest Service is crucial to reducing the decline of spotted owls in Oregon.

Habitat for and created by beavers (CLIMATE-GOAL-02, TRIBAL-BIO-DC-01)

ODFW supports dEIS plan components that recognize the abilities of beaver-modified landscapes to help achieve climate change, wildfire resistance/resiliency, and biodiversity objectives. Enhancing appropriate habitats to encourage beaver activity can create watersheds more resistant and resilient to climate change and wildland fire, protecting and increasing biodiversity. As such, ODFW has created and is implementing a Beaver ActionPlan to protect and restore beaver habitat and beaver-modified habitat in Oregon. ODFW supports efforts focusing on increasing water availability, beaver forage (hardwood components), reducing road networks, and modifying/defending culverts to promote and support beaver-modified landscapes.

To identify areas on National Forest lands appropriate for encouraging beaver activity, ODFW recommends the Forest Service undertake a comprehensive effort to identify and map beaver presence, beaver habitat, and areas best-suited for beaver-modified landscapes. The maps should prioritize areas to enhance habitats to encourage the natural dispersal of beavers across the landscapes. While ODFW-approved beaver relocation may be an option and appropriate in some locations, ODFW recommends pursuing other options to promote beaver activity first (e.g. create/improve beaver habitat at the site) as natural dispersal is a strong component of beaver life history and relocations put beavers at risk of predation and facilitate the transmission of diseases and pathogens.

1. Climate change (FORSTW-ALL-DC-03, FORSTW-ALL-DC-04, FORSTW-ALL-DRY-DC-

03, FORSTW-ALL-DRY-DC-07)

ODFW supports the proposal to address the threats from climate change by promoting climate adapted species assemblages in areas of changing climatic conditions. Using a proactive stewardship that includes the retention, recruitment, natural succession, and connectivity of wildlife habitats will move future forest conditions toward resiliency to climate stressors of future environments.

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[rsquo]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[rsquo]s native biota. The agency fully supports the NWFP Amendment plan components that address the impacts of climate change on forest ecosystems in the northwest. Given the agency[rsquo]s wealth of knowledge and experience, ODFW recommends the Forest Service consult with the agency in development of management actions to implement project to increase forest resiliency to address the effects of climate change on National Forest in Oregon.

Connectivity (FORSTW-ALL-DC-06, FORSTW-ALL-MOI-DC-03, CLIMATE-DC-3,

ODFW appreciates the NWFP Amendment recognizes the importance of connectivity to provide fish and wildlife climate and fire refugia. In order to meet the objective of providing climate and fire refugia to prepare for the impacts of climate change, ODFW recommends that the Forest Service prioritize the identification and mapping of refugia and connectivity areas on national forest and adjacent lands, prioritize refugia in dry forests for restoration treatment especially in riparian area, and use adaptive management to respond to climate threats in real time to provide connected refugia and migration corridors as conditions change.

ODFW has mapped Priority Wildlife Connectivity Areas (PWCAs) to provide information on places across 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 resources to inform the identification of high use movement corridors for fish and wildlife that can provide insight to support the NWFP Amendment.

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 local tribes in identifying and mapping current movement corridors and for developing management plans to maintain, enhance, and increase connectivity areas.

1. Air Quality (dEIS-Vol. 1: 3.7 Issue 6, dEIS-Vol. 1: 3.4.1.4)

ODFW appreciates the Forest Service recognition in the dEIS that large, high-severity wildfires have resulted in degraded air quality due to smoke from the wildland fires. The agency also acknowledges that increased use of prescribed and Tribal burning treatments to meet forest health restoration goals may result in many rural and urban communities[rsquo] exposure to hazardous levels of smoke. However, without these treatments, wildland fires will continue to reach uncharacteristic levels of severity and intensity, threating communities and natural resources. ODFW recommends the Forest Service, and the Tribes stage burn treatments when smoke will have minimal effects on communities when practicable.

1. Sustainability of Regional Communities (FORSTW-ALL-DRY-PMA, FIRE-ALL-GOAL- 03, CLIMATE-DC-04, ECONSUST-DC-02)

Recreation and tourism are growing sectors of Oregon[rsquo]s economy and a key opportunity for the northwest forests to support the long-term sustainability of communities. Non[ndash]timber resources and values [ndash] including recreation such as hunting, fishing, and wildlife viewing [ndash] contribute to economic stability at the local, regional and statewide levels and are expected to increase over time. ODFW recommends the Forest

Service consider recreation as a key use of National Forests as a means to enhance local economies.

Recreational access(TRIBAL-FORSTW-ALL-GDL-02)

Depending on type and location, recreational areas can have a wide variety of direct and indirect impacts on fish and wildlife and their habitats. Unfettered recreational access to sensitive wildlife areas will have detrimental impacts to critical wildlife resting, foraging, movement, and refugia areas. ODFW recommends that recreational access and opportunities are carefully planned in partnership with local states and Tribes to maximize opportunity and minimize impact to fish and wildlife. This may include reducing road density and designing seasonal access opportunities that allow wildlife access to critical habitats when most needed.

Conclusion

In conclusion, ODFW has a long history of positive working relationships with the Forest Service, and we and look forward to continued work on the NWFP Amendment and other partnerships. Should you have any questions or seek additional coordination with ODFW on our feedback or your proposal, please contact Jessica Watson, Acting Habitat Division Administrator, at 541-351-1196 or Jessica.L.WATSON@odfw.oregon.gov. Thank you.

Sincerely,

[]

ODFW Acting Habitat Division Administrator

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March 5, 2025

U.S. Department of Agriculture Chief Tom Schultz

U.S. Forest Service

1400 Independence Ave. SW Washington D.C. 20250-0003
RE: Region 5 and Region 6; California, Oregon, and Washington; Forest Amendment for Planning and Management of Northwest Forests Within the Range of the Northern Spotted Owl Draft Environmental Impact Statement

Dear Chief Schultz,

The Oregon Department of Forestry (ODF or agency) appreciates the opportunity to provide comment on the California, Oregon, and Washington; Forest Plan Amendment for Planning and Management of Northwest Forests Within the Range of the Northern Spotted Owl (NWFP Amendment) draft Environmental Impact

Statement (dEIS) (89 FR 90280 EIS No. 20240208).

Forests are the predominant ecological feature of Oregon and are vital to supporting cultural, ecologic, social, and economic values. The majority (61%) of the forestland in Oregon is held in federal ownership, with the Forest Service accounting for over 14 million acres (47.3%) of the 29,725,000 acres of forestland in Oregon. This extraordinary acreage and proportion of ownership underlines the significance that management of National Forests holds with respect to the realization of Oregon[rsquo]s forest values, state directives, legislation, and regional forest plans. Amendment of the Northwest Forest Plan is of enormous consequence to Oregon[rsquo]s forests and citizen[rsquo]s well-being, sustainability, and values fulfillment.

The Oregon Department of Forestry endorses the five NWFP interrelated areas of focus identified as needed change:

* Sustainability of Regional Communities in providing a predictable supply of timber and non- timber products, and other economic opportunities to support the long-term sustainability of communities located proximate to National Forest System lands and economically connected to forest resources.
* Improving fire resistance and resilience across the NWFP planning area.
* Incorporating Indigenous Knowledge into planning, project design, and implementation to achieve forest management goals and meet the agency's trust responsibilities.
* Strengthening the capacity of NWFP ecosystems to adapt to the ongoing effects of climate change.

* Improving conservation and recruitment of mature and old-growth forest conditions, ensuring adequate habitat for species dependent upon mature and old growth ecosystems and supporting regional biodiversity.

These areas identified in the dEIS align with our state's priority forest health goals as outlined in Oregon's State Forest Action Plan, Oregon[rsquo]s Vision for Federal Forestlands, and Shared Stewardship MOU with the USFS which agrees to operate under the principles of:

* Open, transparent, inclusive, and accountable processes.
* Adaptive management approaches that include: experimenting, learning, and implementing work to achieve outcomes at scales that are meaningful.
* Maintain our all-lands, all-hands approach of cross boundary partnerships for landscape scale restoration and a focus on outcomes with metrics, in addition to outputs.

ODF agrees that changed ecological and social conditions, as well as substantial new information, support the need for an amendment to the 1994 NWFP and support updating the NWFP to address the seven interrelated issues identified in the dEIS in a manner that sustains forest ecosystems and supports Oregon[rsquo]s communities.

We offer the following comments and recommendations on the dEIS and its range of alternatives.

Recommendations

1. Formal Inclusion of State Agencies in Decision-Making

State forestry agencies such as ODF have extensive expertise and on-the-ground knowledge that should be formally incorporated into federal forest planning and decision-making processes. We recommend that the NWFP amendment explicitly recognize state agencies as co-managers or key partners in forest management. This will ensure that state-level data, best practices, and wildfire risk reduction strategies are fully integrated into federal land management decisions. Notably, state agencies are not explicitly listed as partners in certain sections of the dEIS (e.g., CLIMATE- GOAL-01, the background of ECONSUST, and the delineation of Community Wildfire Protection Zones). Given our statutory responsibilities and expertise in suppressing wildfire and managing extensive forested lands across Oregon, ODF believes that including state agencies in these planning discussions will help foster federal forest management consistent with state and agency policies and objectives.

Involving state agencies in project planning and implementation will also enhance outcomes for forest health and habitat. For example, in the context of restoring complex forest structure, we recommend that the Forest Service involve local tribes and state agencies when developing thinning projects in old growth and mature forests. In formally acknowledging state agencies as partners in the NWFP amendment and its implementation, the Forest Service can leverage state- level knowledge and resources, ensure consistency with state conservation goals, and strengthen intergovernmental collaboration.

1. Local Land Manager Discretion

ODF strongly supports providing local land managers with greater decision-making discretion. This interest is expressed in proposed plan component FORSTW-LSR-PMA-D, which would allow silvicultural prescriptions and projects to be approved by Forest Supervisors at the forest level,

rather than requiring regional-level review. Empowering local line officers in this way is expected to expedite decision-making, reduce administrative delays and costs, and ensure timely implementation of science-based management practices on the ground. We believe local forest supervisors, working in coordination with tribal and state partners, are well positioned to adapt management activities to site-specific conditions and community needs.

At the same time, adequate oversight and consistency must be maintained. ODF recommends that as the agency increases local discretion, it also provides clear guidance and training to local units to implement best practices and adhere to the intent of the NWFP amendment. Collaboration with state agencies can assist in this regard by sharing state-level best practices and ensuring that local decisions remain aligned with broader landscape goals. Overall, we favor the direction strengthening local adaptive management authority, and we encourage the Forest Service to carry this concept into the final plan, so long as robust collaboration and accountability measures are in place.

1. Survey and Manage Program

Timely project implementation is challenged in the current Survey and Manage program requirements under the NWFP. As written, these requirements can hinder forest health and wildfire mitigation projects by imposing procedural burdens and surveys that significantly increase costs and delay treatments. The dEIS proposes some limited exemptions (e.g., FIRE-ALL-GDL-06-D). In considering reducing constraints in strategic locations, the Forest Service can expedite projects that protect public safety and forest health. We urge the Forest Service to explore adjustments or streamlining of the Survey and Manage program through this amendment or parallel processes, to ensure that well-intentioned wildlife survey requirements do not inadvertently impede the achievement of the amendment[rsquo]s forest resilience and habitat improvement goals.

1. Wildland Fire Management and Resilience

Wildfire is a paramount concern for ODF and appreciate that the dEIS addresses Fire Resistance and Resilience as a key issue. We support many of the proactive fuel reduction and wildfire response strategies proposed. Increasing and emphasizing areas and acreages of fuel treatments will improve fire resilience on federal forests. The agency also recognizes the ecological importance of fire and the historical role of frequent fire in many of Oregon[rsquo]s forest ecosystems. Decades of fire suppression, exclusion of Indigenous burning practices, and past management have left many landscapes unnaturally dense and prone to high-severity fire. ODF supports restoring more natural fire regimes to the extent possible, through means such as prescribed burning and managed wildfires under controlled conditions. We concur that using Indigenous knowledge and even adopting conservative [ldquo]let burn[rdquo] policies, but only when and where fires can produce significant ecological benefits without jeopardizing public safety or damaging private lands and help return forests to their historic range of variation and improve long-term resilience.

We urge the Forest Service to consider in balance, increased application of prescribed fire and managed wildfire for ecological benefit on remote or favorable weather days while maintaining suppression where fires pose high risk to communities and resources. Any plan components encouraging wildland fire use should be framed as flexible guidelines rather than hard targets, implemented only with rigorous risk assessment and interagency coordination.

Community Wildfire Protection and restoration are an expressly significant concern with respect to climate change, forest health, agency priority, and community protection. The agency recommends that the final plan consider a practical community protection zone strategy to address this priority interest. Delineating Community Wildfire Protection Zones through collaboration with local constituents (such as those involved in Community Wildfire Protection Plans, or CWPPs) and prioritizing treatments around communities will address community immediate threat concerns whereas a drawn down buffer may omit significant considerations that factor in raising community threats.

Invasive species management can be a significant factor in exacerbating fire risk, alter fire regime (spread and ignition), and represent a significant threat to the ecological integrity of forest ecosystems. The agency supports dEIS components that actively direct aggressive actions treating and managing invasive species. This approach supports both fuel reductions and is impactful as an element of restoration function. Robust invasive species control is necessary to ensure fuel treatments and post-fire recovery are effective and that native habitats and function are maintained.

1. Tribal Engagement and Indigenous Knowledge

ODF fully supports the Forest Service[rsquo]s efforts to increase meaningful Tribal engagement and the incorporation of Indigenous Knowledge in federal forest management, as outlined in the dEIS under Incorporation of Indigenous Knowledge and Increased Tribal Engagement. Oregon[rsquo]s federally recognized tribes hold significant knowledge of the forested landscapes in the Northwest Forest Plan area. Effective co-stewardship with Tribes is critical to restore and conserve the diversity of forest habitats and to provide for cultural, medicinal, and spiritual resources important to Tribal communities.

The NWFP amendment should facilitate collaboration with Tribes at all stages, planning to implementation, to fulfill federal trust responsibilities and treaty obligations, and ensure management policies are informed by place-based Indigenous Knowledge alongside Western science. ODF is pleased to see plan components in the dEIS that support Tribal inclusion and traditional ecological knowledge. The agency supports TRIBAL-AG-STD-01 and TRIBAL-BIO- DC-01, which aim to enable co-management activities (such as cultural burning and harvesting of forest products) in consultation with Tribes.

We specifically support the actions of TRIBAL-FORSTW-ALL-GOAL-08-D incorporating Tribes in developing treatments for first foods and expanding prescribed fire and TRIBAL-FORSTW- ALL-PMA-D (promoting culturally important plants like beargrass and huckleberry in moist forests). These measures will not only benefit Tribal members through increased availability of traditional resources but enhance ecosystem diversity and resilience more broadly. Cooperative habitat management that creates forest openings and early-seral conditions can sustain healthy populations of culturally significant wildlife and plant species.

1. Forest Stewardship and Management

The agency supports the NWFP amendment[rsquo]s emphasis on Forest Stewardship that balances active management with the conservation of old-growth and mature forests. Additional support is given to clearer definitions and standards for forest structural stages, which will improve consistency of management. Establishing clear identification for what constitutes old-growth and mature forest stands will benefit project planning.

ODF also supports the intention to raise the stand age threshold for active management from 80 years to 120 years in Late Successional Reserves. The intent is to ensure younger mature stands in LSRs are eligible for thinning or other treatments to improve resilience will permit increasing active management of LSRs especially in younger, even-aged plantation stands that lack the species and structural diversity of natural late-successional forests.

Many LSR areas would benefit from silvicultural treatments [ndash] such as thinning, creating gaps, and underplanting with diverse native species [ndash] to foster old-growth characteristics and better habitat

conditions over time. We encourage the Forest Service to take an active stewardship approach in these areas: judiciously thin crowded stands, open occluded meadows, and plant a mix of native trees and shrubs, all while avoiding impacts to any existing late-successional habitat elements. We note that even as we maintain protections for old-growth, there is ecological value in actively managing certain stands within LSRs to accelerate the development of complex forest structure and reduce the risk of severe disturbances.

ODF places high importance on protecting true old-growth forests and older trees across the NWFP landscape. We strongly support policies that remove old-growth stands from the timber base in Matrix and AMA lands (i.e., no commercial harvest in remnant old-growth) and that only allow thinning in mature forests when it is done to restore ecological integrity. Maintaining these older forest types is vital for species that depend on late-successional habitat, for carbon storage, and for their intrinsic ecological value.

Additionally, ODF supports Alternative D[rsquo]s approach to protecting the oldest cohort of dry-forest trees (those established prior to the year 1850), as specified in FORSTW-ALL-DRY-STD-01-D. This standard would ensure that legacy old trees in dry forests (which are often the most fire- resilient and ecologically important individuals) are retained during management activities.

Alternative B[rsquo]s comparable guideline set a 150-year age threshold for retention, which ODF feels is less forward-looking. A rolling 150-year cutoff would each year newly [ldquo]recruit[rdquo] slightly younger trees into protected status, eventually encompassing many trees that regenerated after 1850 [ndash] potentially limiting management flexibility as time goes on. By contrast, a fixed pre-1850 standard permanently protects the truly ancient trees and allows for proactive management (such as selective thinning) around slightly younger cohorts to promote forest health. We believe this approach (as in Alt D) strikes a good balance by safeguarding irreplaceable old specimens while not unduly constraining the ability to manage mid-1800s era stands that may now be overcrowded. We recommend the final plan adopt a clear old-tree retention standard in dry forests akin to the Alternative D language, along with criteria to ensure any thinning around those trees is done in a way that reduces competition and supports their longevity.

ODF supports increasing the pace and scale of active management in younger forests, particularly those in Matrix lands designated for sustained yield. We note with favor the objective under Alternative D (FORSTW-MTX-MOI-OBJ-01-D) to treat 20% of stands in the Matrix that are 0-30 years old. This is a more ambitious target than Alternative B[rsquo]s 10% treatment rate for young stands. Actively managing young plantations (through pre-commercial thinning, variable density thinning, etc.) will enhance structural heterogeneity early, improve wildlife habitat, and ultimately yield healthier stands that can better contribute to both ecological and economic objectives. We encourage the Forest Service to incorporate a robust young stand management program in the final

plan, as it supports long-term forest stewardship by setting stands on the right trajectory from the beginning.

1. Climate Change and Carbon Management

Climate change is a driving factor behind many of the issues addressed in the NWFP dEIS from altered wildfire regimes, invasive range shifts, pest outbreaks to shifting species distributions. ODF appreciates that the

amendment is considering climate adaptation and mitigation throughout. We especially support measures that increase the forests[rsquo] resilience to climate stressors and that maintain forests as a long-term carbon sink. Many of the actions discussed above such as reducing stand densities to lessen drought stress, using prescribed and managed fire to prevent catastrophic emissions, and reforesting burned areas are consistent with climate change objectives. By pursuing these actions, the Forest Service can help ensure that our forests continue to sequester carbon, provide clean water, and regulate local climates even as broader changes unfold.

ODF would highlight the benefit of post-disturbance reforestation and afforestation efforts (e.g., FIRE-ALL-OBJ-03-D as noted earlier). Prompt reforestation after wildfires or large disturbance events will support the return of forest cover and carbon uptake on those sites. We also support managing for species diversity and structural complexity, as more diverse forests are generally more resilient to climate-driven impacts like pests, fire, and storms. The dEIS[rsquo]s inclusion of objectives to maintain or increase hardwood components, diverse age classes, and genetic diversity of trees will be important in this regard.

On the mitigation side, ODF notes that a balanced approach to forest management can both bolster the forest carbon sink and provide sustainable wood products that store carbon and substitute for more fossil-fuel-intensive materials. The NWFP amendment alternatives each have different implications for carbon sequestration and timber outputs; we believe a blend can be achieved that sequesters carbon in forests while still allowing for climate-smart harvest levels. For instance, retaining older forests (as all alternatives largely do) protects significant carbon stocks, while increasing thinning in overstocked stands (as in Alt D) can reduce the risk of high-emission wildfires. The timber harvested from those thinnings can be used in long-lived products. ODF encourages the Forest Service to incorporate the best available science on forest carbon dynamics so that the final plan supports Oregon[rsquo]s and the nation[rsquo]s climate goals in tandem with other objectives.

1. Economic and Community Sustainability

ODF strongly believes that the ecological sustainability of federal forests and the economic vitality of regional communities exist concurrently.

One aspect of community sustainability is forest products availability and restoration opportunities. ODF supports a land management strategy that yields a reliable, sustainable level of timber and other forest products consistent with ecosystem health. In this regard, we find merit in Alternative B[rsquo]s economic sustainability objective (ECONSUST-OBJ-01-B), which targets treating 660,000[ndash]810,000 acres (producing 5,900[ndash]13,500 million board feet) over the plan period. This level of restoration treatment and timber output can help support rural economies while still meeting conservation goals. We encourage the Forest Service not to lose sight of economic sustainability in the final plan [ndash] Alternatives B and D strategies could achieve both healthy forests and a stable supply of restoration- based timber outputs.

In summary, ODF urges that the final NWFP amendment strives for balance: support local communities through sustainable timber harvest levels, job creation in restoration and stewardship, and robust outdoor recreation opportunities, while also safeguarding the ecological values that underlie those economic benefits.

Oregon[rsquo]s communities [ndash] from timber counties to Tribes to outdoor enthusiasts [ndash] are all stakeholders in these forests. A successful plan will be one that they can all find value in and support.

Conclusion

The Oregon Department of Forestry values its dynamic and collaborative relationship with the U.S. Forest Service and appreciate the opportunity to comment on the Northwest Forest Plan amendment. We appreciate the Forest Service[rsquo]s extensive efforts to incorporate diverse perspectives [ndash] including those of state agencies, Tribes, local communities, industry, and environmental groups in this dEIS. As outlined above, we see strengths in multiple alternatives and encourage a final plan that integrates the best components of each to achieve a resilient, adaptive, and sustainable management framework for our Northwest forests.

ODF is committed to assisting in this process and appreciates the opportunity to comment on this plan amendment, please contact John Tokarczyk, Resources Planning Director at (503) 945-7414 or John.A.Tokarczyk@odf.oregon.gov with any additional questions or further coordination.

Sincerely,

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Interim Deputy State Forester

ATTACHMENT-LETTER TEXT: 03.11.25_Governor's Letter Draft NWFP Amendment dEIS with attachments.pdf; this is the same content that is coded in text box; it was originally included as an attachment