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Comments: Tom Schultz Chief

United States Forest Service 1400 Independence Ave., SW Washington, D.C. 20250-0003

Dear Chief Schultz:

Congratulations on your appointment to serve as the 21st Chief of the United States Forest Service. I am writing to you regarding the current review, status and efficacy of the Northwest Forest Plan - particularly in light of President Trump's recent Executive Order regarding American timber production.

Douglas Timber Operators (DTO) is a community-supported organization that represents forest products manufacturers, loggers, timberland owners, truckers, Indian Tribes and ordinary citizens. Douglas County, Oregon is home to seventeen forest products manufacturers and continues to be proud that we are the "Timber Capital of the World."

SUMMARY OF COMMENTS

The Northwest Forest Plan ("NWFP") is utterly failing to meet its intended ecological and economic outcomes. The current trajectory of the NWFP is extinction for the Northern Spotted Owl and the continued collapse of milling and logging infrastructure in western Oregon, where county governments are cutting essential public safety programs in the face of reduced federal timber receipts.

The NWFP needs a full revision with a dynamic forest management approach that addresses the increasing threat of wildfire to the landscape, habitat and human safety.

DTO also aligns with the technical comments submitted by the American Forest Resources Council and the Intertribal Timber Council.

OBSERVATIONS ON THE UMPQUA NATIONAL FOREST

Between job losses, county revenue reductions and environmental degradation from wildfires -[shy] no community has suffered the consequences of failed federal forest management more than ours. The 1994 Clinton-Gore Northwest Forest Plan promised communities like ours a "predictable and sustainable level of timber sales." Sadly, neither of those pledges ever materialized. The reality is that both the environmental and economic trajectory of the NWFP are unsustainable.

Prior to the 1990's, the Umpqua National Forest produced between 300-400 million board feet (mmbf:) annually. The Northwest Forest Plan (as adopted into the forest plan for the Umpqua National Forest) provided an annual Allowable Sale Quantity of 78 mmbf. That level of timber production has never been met on the Umpqua National Forest ("UNF"). In recent years, local manufacturers have been told there really is no "target" for the UNF. Instead, the UNF is given a region[shy] assigned number based on funding and staff allocations. Currently, this region-assigned harvest guideline is around 25 mmbf. For context, based on head rig capacity of local mills (640 mmbf:), the UNF's annual volume is enough wood to supply Douglas County mills for 14 days per year.

[SEE PDF - UMPQUA NATIONAL FOREST Awarded Timber Sales + Acres Burned]

The nebulous NWFP timber "target" on the UNF is best explained by the Forest itself:

"It is no longer relevant to compare actual timber outputs on the Umpqua National Forest with metrics from the Umpqua National Land and Resource Management Plan or the original 1994 Northwest Forest Plan, due to significant changes in Forest Service policies, guidance, and legal decisions, so we have changed the monitoring question." ¹ [Emphasis added]

In other words, the UNF (and possibly all forests within the NWFP area) no longer have any measurable metric of success with respect to timber production.

President Trump's Executive Order requires "a plan that sets a target for the annual amount of timber per year to be offered for sale over the next 4 years from Federal lands managed by the BLM and the USPS." At the very least, the UNF and other National Forests covered by the NWFP should be tasked with developing a timber sale plan that meets the PSQ's originally calculated in the NVFP.

1 Biennial Monitoring Evaluation Report for the Umpqua National Forest, Fiscal Years 2021-2022. Page 16.

Legislation introduced² in the United States Senate, intended for the Black Hills National Forest, provides examples of how to get National Forests back on track with respect to basic timber production:

- * Require National Forest System units (individual national forests) to submit harvesting improvement reports to the

U.S. Secretary of Agriculture (Secretary) if they have historically fallen well below annual Allowable Sale Quantity numbers laid out in forest plans.

- * Require National Forests to demonstrate actionable steps towards improving timber sale numbers within one year of enactment. If a forest supervisor does not increase timber sales from the preceding year, they will be required to submit another improvement report within 180 days after the actionable step deadline.

- * If a National Forest does not demonstrate harvesting improvements one year after submitting a harvesting improvement report, the Secretary is directed to take any reasonable steps to improve harvesting outputs. This may include providing additional personnel, expanding the use of Good Neighbor Authority and finding any feasible actions to expedite environmental review processes.

WILDFIRE IMPACTS

Massive environmental impacts of wildfire are nullifying perceived habitat conservation in the NVFP's reserve-based system. The UNF's biennial monitoring report states that:

"severe fire has reduced the amount of habitat for the northern spotted owl throughout its range. This trend is different from the expectations in the Northwest Forest Plan, which anticipated that the reserve system would be

sufficient to maintain and increase late-seral habitat while timber harvest would deplete habitat outside the reserves."³ [Emphasis added]

DTO conducted its own analysis of the impacts of wildfire on the UNF. Using publicly available Forest Service data, we found:

- * 44% of the UNF has burned between 1987-2021;
- * LSR/Roadless areas comprise 38% of the UNF but account for 63% of the total burned acres;
- * 57% of LSR/Roadless areas have burned.

Specifically on the Tiller Ranger District (362,440 acres):

- * 145,930 acres (40% of TRD) have burned at least once over the past 30 years;
- * 59% of "restricted" management (LSR, riparian area, etc.) areas have burned;
- * 73% of the total burned area is within "restricted" management.

The data clearly show that wildfire is occurring at a greater pace and scale within NWFP reserved areas than on the UNF as a whole. Not only does fire occur disproportionately in NWFP reserves in the UNF, there are also greater losses of "old growth" in the reserves than in un-reserved areas:

"Between 1993 and 2022, the proportion of forest exhibiting old-growth characteristics has declined in all Northwest Forest Plan land use allocations on the Umpqua National Forest. The proportional and absolute decreases in acres of old-growth have been steeper in late-successional reserves than in unreserved land allocations (open to timber harvest)."⁴ [Emphasis added]

The fire intensity in recent years is also greater in NWFP reserves than un-reserved areas:

² <https://www.rounfs.senate.gov/newsroom/press-releases/rounfs-leads-legislation-to-increase-timber-sales-in-the-black-hills-national-forest/>

³ https://www.fs.usda.gov/Internet/FSE_DOCUMENTS/fseprd1166512.pdf

⁴ Page 18: https://www.fs.usda.gov/Internet/FSE_DOCUMENTS/fseprd1166512.pdf

"In 2021, the majority of high-severity fire (tree basal area mortality greater than 75 percent) on the Umpqua NF occurred in late-successional reserves: more than 19,000 acres compared with about 3,300 acres of high-severity fire in unreserved lands."⁵ [Emphasis added]

It is indisputable that NWFP reserves are failing to achieve their intended purpose on the UNF. The maps below

show cumulative fire impacts on the UNF in the years 1987 and 2021.

[SEE PDF cumulative fire impacts]

The map below shows cumulative fire impacts (including fire intensity) on the UNF between 1987-2021. The light green overlay shows LSR/ roadless areas, where 63% of these fires have occurred:

[SEE PDF - Mab 1b UNF w/LSR/Roadless Areas. Fire perimeters and medium/high burn intensities]

5 Page 18: https://www.fs.usda.gov/Internet/FSE_DOCUMENTS/fseprd1166512.pdf

Again, the UNF's own report found that:

"With accelerating fire and climate change, limiting management in static reserves cannot guarantee

the persistence of mature or old forest conditions. Updated plan components could include more condition[shy] based management, and emphasize ecosystem processes and fostering environments where old forests can develop in the future more than simply protecting existing old forest from harvest."6 [Emphasis added]

Likewise, the 2020 Bioregional Assessment of Northwest Forests recognizes the limitation of the current reserve system in meeting fire resilience and multi-species sustainment goals in a changing climate:

"The needs of some species associated with old forests that experience dynamic disturbance events are not being met by the static boundaries of late-successional reserves. (Marcot et al. 2018) Managing large reserves as dynamic mosaics of vegetative conditions that meet the needs of various wildlife species as well as goals for resilience to climate change and fire might better align with current goals."7 [Emphasis added]

DTO agrees the reserve-based system is failing. Unfortunately, the NWFP Amendment DEIS doubles down on the reserve system and could ultimately make this situation worse on the UNF.

Despite a failure to meet economic or environmental goals, the UNF's own monitoring report goes on to conclude that the UNF is meeting "Forest Plan direction" in all 15 factors that area measured.

Obviously, something is VERY wrong with the Forest Plan.

ENVIRONMENTAL FAILURES

Northern Spotted Owl: From 2017 -2023, 186,304 acres of reserves (including NWFP riparian reserves and late successional reserves) have been lost to wildfire on the UNF (USFWS, 2023). Across the NWFP area, the population of territorial owls on federal lands decreased by an estimated 61.8%.

Political pressure on the U.S. Fish & Wildlife Service to terminate its Barred Owl management plan further imperils the NSO and places more reliance on forest management actions to reduce the impacts of wildfire on NSO habitat.

Human health is also impacted by increased wildfire activity within the NWFP area. According to recent research, six of the 10 smokiest cities in America are adjacent to National Forests within the NWFP area - just in Oregon.⁸ This includes Roseburg home of the UNF headquarters office.

Forest Conversion: Increased wildfire activity in NWFP reserves is compounded by the inability to remove dead fuels and replant forests. The result is conversion of conifer forests to brush and hardwood landscapes. The UNF's Biennial Monitoring Report states that: "Currently, the size of high-severity patches may exceed the distance that conifer seeds typically travel from their parent trees, limiting regeneration away from the edges of the patch." In other words, stand replacement fires are so large that there is no seed source left for natural reforestation.

Recreation: Repeated wildfires and failures to remove dead fuel severely impacts recreation on the UNF. Fires in 2020 and 2021 alone resulted in the closure of nearly half the North Umpqua Trail. Remaining snags continue to fall on the trail and impede access for hikers as well as first responders such as Douglas County Search and Rescue. Smoke inhibits summer enjoyment of the UNF, including rafting and visitation to popular resort areas like Diamond Lake. Campgrounds, such as Bogus Creek, have remained entirely closed since 2020.

6 https://www.fs.usda.gov/Internet/FSE_DOCUMENTS/fseprd1166512.pdf

7 Page 25: https://www.fs.usda.gov/Internet/FSE_DOCUMENTS/fseprd1168649.pdf

8 <https://www.opb.org/article/2025/02/20/all-science-no-fiction-oregon-has-some-of-nations-smokiest-cities/#:~:text=Bend%2C%20Medford%20and%20Grants%20Pass,the%20University%20of%20Washington%2C%20Bothell.&text=Over%20the%20past%20five%20years,wildfires%20across%20the%20United%20States.>

Water temperature in streams is impacted by fires, especially when dead fuel is left after fires and re-burned. Once again, the Boulder Creek Wilderness offers a glimpse into the future of un-managed areas of the UNF, such as LSR's and Riparian Reserves:

"Water temperatures have been increasing in [Boulder Creek]. The watershed experienced fires in 1986, 2008, and 2017. Because this is a designated wilderness without vegetation management, the trends in water temperature can be attributed to post-wildfire effects (such as loss of shade) ..."⁹ [Emphasis added]

[Figure - Long term temperature sites for Boulder Creek Wilderness at mouth - SEE PDF]

MAJOR FLAWS OF THE NWFP DRAFT AMENDMENT

Land Use Allocations: From the outset, the Federal Advisory Committee ("PAC") for the NWFP was constrained in its scope of work. Land use allocations and "survey and manage" requirements were off the table to discuss. Nevertheless, the DEIS proposes to effectively convert over 1.3 million acres of Matrix into LSR vis-a-vis new desired conditions, standards and guidelines.

The result is a reduction of acres (throughout the NWFP area) available for sustainable timber management from

20 to 4%. Since the LSR's on the UNF are almost entirely "moist" and there are mature stands in Matrix, the likely outcome is a severe reduction in acres available for timber harvest.

At a local public meeting about the DEIS for the NWFP Amendment, agency personnel were unable to provide any specific information about the impacts of the Amendment on the Umpqua National Forest. They were unable to say whether the Amendment would result in more or less timber harvest on the UNF.

Recommended changes ignored: In its own report, the UNF recommended several changes that would improve the persistence of "old growth" forests over time and against the threat of wildfire:

- * Updated plan components could include more condition-based management,
- * using the discretion in the existing Forest Plan to thin in late-successional reserves if the weight of evidence suggests that this would help old forest structures to develop;¹⁰

Unfortunately, the NWFP Amendment/DEIS fails to adopt these recommendations. As noted above, virtually all of the LSR's in the UNF are "moist" under the NWFP. Under the DEIS, salvage of fire-killed material is all but forbidden. Since most severe fires are occurring in NWFP reserves, this will only exacerbate the accumulation of standing, dead fuels on the

9 Page 19: https://www.fs.usda.gov/Internet/FSE_DOCUMENTS/fseprd1166512.pdf

10 Page 21: https://www.fs.usda.gov/Internet/FSE_DOCUMENTS/fseprd1166512.pdf

UNF and accelerate the intensity of wildfires going forward. Thinning and other management in LSR's continues to be based on "age" rather than conditions.

Timber Harvest: While the DEIS predicts a substantial increase in timber harvest over the NWFP area, it fails to produce any localized estimates. As noted above, it is likely that timber harvest potential would be reduced on the UNF because of the makeup of LSR/Matrix and new desired conditions/standards for each of them.

The UNF's inability to ever produce the previous ASQ under the NWFP suggests that any predictions about increased timber harvest are aspirational at best. Recent staff reductions and appropriations priorities make it hard to believe that the UNF's timber plan will go anywhere other than down under the DEIS.

Adaptive Management Areas under the NWFP have never been managed according to the original plan. The Little River AMA consists of nearly 100,000 acres that was supposed to test "approaches to integration of intensive timber productions with restoration and maintenance of high-quality riparian habitat."

The Forest Service's website for "research and monitoring" on the Little River AMA has not been updated since 2001 - 24 years ago.¹¹

The DEIS is unclear about how AMA's will be managed in the future. If the USFS intends to finalize the DEIS rather than re-write the NWFP, the Little River AMA should be clearly transitioned to Matrix LUA where the

primary management objective is timber production.

Tribal Inclusion: Several Indian Tribes are active members of DTO. We support the request of the Intertribal Timber Council for a full revision of the NWFP to better address the concerns and questions of affected tribes.

The Tribal recommendations in the DEIS should be adopted regardless of the status of the DEIS.

Should the NWFP be fully revised, the Forest Service must meet its statutory obligations to coordinate the forest plan revision with the land use planning and management programs of and for Indian tribes.

CONCLUSION

DTO believes that the NWFP must be fully revised to achieve its intended outcome: a predictable and sustainable supply of timber while protecting the environment. Should the Forest Service embark of a full plan revision, it could be helpful to advance portions of the DEIS to guide forest management in transitional years. These elements could include provisions applicable to dry Matrix/LSR, conversion of the AMA's to Matrix, and the Tribal recommendations.

Whether the Amendment is finalized or not, DTO recommends prioritization of the UNF's timber program to align with local processing capacity, and timber revenue needs of Douglas County.

In 1993, President Clinton created the Forest Ecosystem Management Assessment Team (FEMAT) [middot]which delivered its assessment within 3 months. Its task was to "to identify management alternatives that would attain the greatest economic and social contribution from the forests of the region" (FEMAT 1993, p. ii) and that were consistent with applicable laws and regulations, such as the Endangered Species Act (ESA).

DTO recommends tasking a similar technical working group comprised of experienced forest managers -- rather than researchers, 'ologists, lawyers and activists - with drafting a full NVFP revision. There is a massive amount of existing data available from the FAC, Science Synthesis & Bioregional Assessment, and monitoring reports from individual National Forests within the NVFP area. Such a team could produce plan revision options in a similar timeframe as FEMAT, and a Draft EIS could be produced by the end of 2025.

11 <https://hvwwww.fs.usda.gov/r6/reo/landuse/ama/research/lilriv.htm>

A full revision of the NWFP fulfills the spirit of President Trump's recent Executive Order. OTO stands ready to assist the Forest Service in any way possible toward that end.

Sincere ',

[] Executive Director

ATTACHMENT-LETTER TEXT: 2025-03-13 DTO Comment letter.pdf; this is the same content that is coded in text box; it was originally included as an attachment