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Comments: Comments on the Draft Environmental Impact Statement Northwest Forest Plan Amendment
By Jerry F. Franklin, K. Norman Johnson, and Debora L. Johnson March 12, 2025

We o?er the following comments on the Draft Environmental Impact Statement (DEIS) amending the 1995 Northwest Forest Plan (NWFP). Two of us (Franklin and K. N. Johnson) were participants in the development of the NWFP as members of the Forest Ecosystem Management Team. This team created the plan alternatives considered by President Clinton and evaluated their e?ects. We have also analyzed the historical development and application of the NWFP during its ?rst 25 years of existence in several articles and a book entitled The Making of the Northwest Forest Plan: The Wild Science of Saving Old Growth Ecosystems (OSU Press, 2023).

General Comments on the Draft EIS

The Secretary of Agriculture created a Federal Advisory Committee in 2023 to advise the USDA Forest Service on amending the NWFP, and the Forest Service then prepared a draft Environmental Impact Statement (DEIS) that would implement these changes. The Committee's recommendations are the basis of the Proposed Action (Alternative B) in the DEIS. They call for signi?cant improvements such as greatly enhancing the role of Tribes in planning and managing these forests, completing the prohibition of logging older Moist Forests (those currently over 120 years of age/born before 1905) that the NWFP began, and accelerating much need restoration and fuel reduction in Dry Forests. We build on those recommendations in our comments.

We divide our comments into two categories of forest (Moist and Dry) following both the approach taken in the FACA and in the DEIS. The Moist Forests are the classical westside forests dominated by Douglas-?r and western hemlock; because of their moist environment wild?res are infrequent but typically include signi?cant areas of high severity when they do occur. The Dry Forests were characterized historically by frequent ?res and are found on the eastern slopes of the Cascade Range and in the Klamath-Siskiyou region of southwestern Oregon and northern California. The majority have undergone dramatic change in density, composition, and wild?re behavior after a century of ?re elimination.

The ?nal EIS needs to provide a much more informative description of what ecological silviculture looks like in both Dry Forests and Moist Forests, preferably including photographs or illustrations. As an example, Dry Forest restoration approaches are not adequately described in the DEIS, primarily calling for retention of all older (>150 year) trees. This leaves the reader unfamiliar with restoration wondering if that is all that is going to be left! A suggested description of ecological silviculture in Dry Forests is included in an Appendix.

Restoration of Dry Forests

One of the most important ecological recommendations in the Proposed Action is aggressive restoration activities in the Dry Forests, both inside and outside of Late Successional Reserves. The majority of these forests have responded to a lack of ?re by becoming dense and dominated by ?re-vulnerable species, such as grand/white ?r. They are at high risk of catastrophic loss to ?re, drought, and insects in their current condition and the loss of the northern spotted owl as part of those catastrophes.

The Dry Forests were largely an after-thought in the development of the original NWFP. FEMAT scientists recognized that restoration of these forests was desirable and provided permission for treatments.

However, conducting such activities was not emphasized in the plan, which inappropriately directed treatments toward young rather than old forests. Hence, Dry Forests in Late Successional Reserves rarely received restoration treatments.

We view the proposal in the DEIS for widespread restoration treatments in the Dry Forests both within and

outside of the Late Successional Reserves as highly desirable. These forests need to be restored to their historic structure and composition and ?re reintroduced as a regular disturbance. However, the restoration does need to provide for systematic retention of patches of denser forest habitat needed by northern spotted owls, their prey, and other species, such as goshawks. Identi?cation of these habitat patches is a very high priority for Forest Service and US Fish and Wildlife biologists so that the restoration work can get underway in the surrounding Dry Forest.

This integration is especially important because the spotted owl appears to have its best chance for competing with the barred owl in warmer, drier forests that occur in the Dry Forests in the eastern slopes of the Cascade Range, the Klamath-Siskiyou region of southwest Oregon, and northern California. Barred owls prefer cool and moist habitats to drier forests. The notion of Dry Forests becoming prime habitat for the spotted owls is a bit of a surprise because much of the habitat they currently occupy in those forests was not historically present and the owls were uncommon there. Now Dry Forests may provide the best opportunity for spotted owls to persist.

This situation could create a signi?cant potential con?ict between restoring Dry Forest and providing suitable habitat for nesting, roosting and foraging for northern spotted owls. Simultaneously creating a plan for Dry Forests that enables both forest restoration and spotted owl conservation may be the biggest challenge the Forest Service faces in this update to the NWFP.
Sustaining the Moist Forest Land Base for Timber Production While Reserving Older Forests
Two land allocations, Matrix and Adaptive Management Areas (AMAs), provided the sustained yield land base for the NWFP in Moist Forests. The available land base for timber production on these land allocations has proved to be smaller than estimated in 1994. One important reason for that di?erence is that a part of the NWFP Matrix/AMA determination[mdash]delineation of species bu?ers associated with Survey and Manage[mdash]could not be undertaken until site speci?c surveys were completed. That especially a?ected the availability of Matrix/AMA acres that contained old-growth forests.

In addition, protest and litigation of Forest Service logging of mature and old-growth forest, which was permitted under the Plan, caused the Forest Service to shy away from such harvest and focus on thinning the plantations in previously clearcut stands in both Matrix/AMA and LSRs. Under the NWFP, thinning was permitted in stands under 80 years of age in LSRs whatever their origin (harvest/?re). That approach was also applied to Matrix/AMA so very little older Moist Forest has been cut in the last 20 years.

The FACA made a major contribution to resolving these controversies by calling for all Moist Forest in Matrix/AMA currently over 120 years of age (born before 1905) to be withdrawn from the sustained yield land base. The Forest Service then implemented this decision in a number of DEIS alternatives including the Proposed Action. We strongly support the withdrawal of these older forests from the sustained yield land base. The use of a year criterion (1905) is critical so that forests that grow into and beyond 120 years in the future are not automatically reserved; we want older managed trees and forests as part of future managed forests.

The FACA was not allowed to consider issues related to endangered species and similarly could not consider altering boundaries of land allocations such as the Late Successional Reserves and Riparian Reserves in Moist Forests, which were set up to address endangered species issues. Hence, it could not consider modi?cations in boundaries of land allocations to help o?set the reduction in the timber harvest land base in Moist Forests by withdrawal of the additional older forests. We consider an alternative approach to achieve that goal below.

The primary strategy for conserving the spotted owl in the NWFP was the creation of large blocks of older forest habitat in Moist Forest. These blocks needed to be su?ciently large to support at least 20 pairs of spotted owls. These were the Late Successional Reserves (LSRs). Extensive tracts of younger forest were incorporated in the LSRs due to the past staggered-setting cutting pattern employed by the Forest Service, which left no large blocks

of old-growth forest outside of Wilderness. The plan was that these younger forests, which amount to a signi?cant acreage in LSRs, were to be allowed to grow to "?ll in" the LSRs over time, creating large contiguous blocks of older forest.

Recent scienti?c ?ndings regarding the owl lead to the conclusion that it will be very di?cult to sustain the subspecies throughout its range in the face of competition from the barred owl. While logging in spotted owl habitat largely ceased in Moist Forests[mdash]the classical old-growth forests of western Oregon and Washington[mdash]this has not saved the owl in these forests. Even with e?orts to remove barred owls, the spotted owl appears to have little chance of persisting in the Moist Forests of western Washington and coastal Oregon with, perhaps, slightly better chances in the northern Oregon Cascade Range. The best opportunity to sustain the spotted owl appears to be in the Dry Forest parts of the spotted owl's current range, where competition from the barred owl is not as intense as in the Moist Forest. Hence, it is likely that the locale of future e?orts to conserve the spotted owl will shift from Moist Forests to the Dry Forests.

The bene?ts of reserving all the older forests in Matrix and AMA as recommended by the FACA are many, including providing habitat for a wide variety of old-growth species. However, as important as this reservation would be, we believe that a major contraction of the sustained yield land base is neither socially desirable, equitable, nor in the spirit of the Northwest Forest Plan.

Therefore, we argue that the Forest Service should shift some of the younger forests within LSRs to the sustained yield land base to o?set the acreage lost to that land base by setting aside the older forests in the Matrix and AMA land allocations. LSR plantations make only a marginal contribution to old-growth species, especially in the near term, and their potential contribution to spotted owl persistence in much of the Moist forests would probably not be of much help, given the grave di?culties the owl is experiencing.

This could be done without making any changes to the boundaries of the land allocations. Language could be adopted that would allow an identi?ed portion of the plantations in the LSRs to be actively managed, including for timber production, using ecological forestry principles. The acreage would be su?cient to o?set the acreage lost from the sustainable land base in the Matrix and AMA.

The compensation of the lost acreage by allowing timber harvesting within the LSRs needs to be done thoughtfully. The acreage should be comparable, and the process should begin by determining how much of the older forest in the Matrix/AMA is available for timber production under the provisions of the NWFP. The plantation areas within the LSR selected for management should be carefully selected to minimize their impact on the older forest. Ultimately, the acreage selected from LSRs should approximate the acreage of sustainable forest land base lost in the Matrix/AMAs from withdrawing forest older than 120 years.

In this way, the joint objectives of maintaining a meaningful land base available for timber management in Moist Forest while protecting all older (>120 year) Moist Forest could be achieved. Looking at the bigger picture, we are proposing that the focus of the NWFP shift from spotted owl protection through large reserves to older forest protection across the landscape, while also providing a sustained yield of timber over time.

Finally, we recommend dropping the Survey and Manage requirements in both Moist and Dry Forests. In Moist Forests, this activity was intended primarily to protect species associated with older forests. Under our recommendations, all older Moist Forests are withdrawn from the sustained yield land base. In Dry Forests, restoration needs to move quickly given the ?re and fuels issues there.

Our Recommendations:

We divide our recommendations into those for Moist Forests and those for Dry Forests (with recommendations of the FACA indicated with a *).

Dry Forests

* Undertake a much-needed major restoration program across the landscape in Dry Forests on the eastern

slopes of the Cascade Range and in the Klamath-Siskiyou region of southwest Oregon and northern California. The goal of this e?ort is to reduce fuels, restore more open forests dominated by old trees (trees over 150 years of age), and create more resistant and resilient ecosystems.*
* Protect relatively small patches or islands of suitable habitat for northern spotted owls and their prey, within the landscapes where restoration is undertaken.
* Drop Survey and Manage requirements.*
* Base forest management on ecological forestry principles (see Appendix).*

This approach should integrate two conservation imperatives in the Dry Forest: (1) creating ?re-safe forests and (2) providing patches of spotted owl habitat in the Dry Forest, which is where spotted owls have the best chance of competing with barred owls.
Moist Forests
* Withdraw forest in Matrix and AMA currently over 120 years of age (born before 1905) from the sustained yield land base.*
* Manage an appropriate acreage of plantations in LSRs with ecological forestry to o?set losses to the sustained yield land base by reserving forests born before 1905.
* Drop Survey and Manage requirements.*
* Base forest management on ecological forestry principles, such as using longer rotations and variable retention harvests and encouraging diverse early seral ecosystems.*

This approach integrates two policy imperatives: (1) protecting older forests still available for harvest under the NWFP that have been the subject of much controversy, and (2) ensuring that such reservation does not substantially reduce the sustained yield timber base.

Jerry Franklin is a retired forest ecologist at the University of Washington and Norm Johnson is a retired forest planning and policy professor at Oregon State University. Both helped develop the scienti?c underpinning of the Northwest Forest Plan and are co-authors of The Making of the Northwest Forest Plan: The Wild Science of Saving Old Growth Ecosystems (2023, OSU Press). Debbie Johnson is a professional forester with 40 years of experience who assisted in writing the NWFP book.

APPENDIX
Dry Forest Silvicultural Treatments

The objective of silvicultural treatments in Dry Forests is to restore stands to a condition that is more resistant and resilient to ?re, insects and drought. This involves much more than simply retaining mature and old trees although that is the ?rst step in the restoration. Speci?c silvicultural prescriptions will vary with existing stand conditions and site productivity, but the descriptions will follow similar steps.

Silvicultural treatments begin with the retention of all old (>150 years) trees of all species present in the stand. Fuels and competing vegetation near these trees (e.g., within twice the canopy drip line of the older trees) will also be treated to enhance their survival potential.

The remainder of the stand is thinned with the goals of (1) decreasing stand density, (2) increasing mean tree diameter, and (3) shifting composition toward more ?re tolerant species, such as ponderosa pine and western

larch. These stand-level treatments will also use marking approaches (such as individual trees, clumps, and openings or ICO) that will result in the irregular patchy pattern characteristic of these forests rather than being uniformly spaced.

The target density (trees/acre or basal area/acre) for the thinned stand will largely depend upon site productivity. Basal area of older trees will not be included in calculating the desired target density.

Both conifers and hardwoods are included in the treatments. Including hardwoods is particularly important in the Dry Forests of northern California and southwest Oregon. Hardwoods have signi?cant ecological value, including reducing the ?ammability of the treated forests and increasing resilience or recovery when a wild?re does occur.

Prescribed ?re is used to reduce fuel loadings following mechanical treatments. This is a very important step in the treatment in order to have much higher resistance and resilience to subsequent wild?re.

ATTACHMENT-LETTER TEXT: Comments Franklin Johnson and Johnson.pdf; This is the same content that is coded in text box; it was originally included as an attachment