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Comments: To:       USDA Forest Service

From:   Lisa D. Hoover

Date:   March 16, 2026

RE:       Comments to the Northwest Forest Plan and Draft Environmental Impact Statement

To the Forest Service,

Following are my comments based upon review of the documents, topics of interest/concern, and my experience as a Forest Service employee. I also want to express my gratitude that the plan amendment involves the input, knowledge, expertise[hellip] of a Federal Advisory Committee (FAC). The role of the committee is important[mdash]the articulation of objectives, side boards, actions, priorities[hellip]in coordination with the US Forest Service.

1. Ecologically-based Management. As long as the types and scope of actions proposed in late-successional forests (dry or moist), in particular those classified as Late-Successional Reserves (LSRs), are founded and driven by ecological conservation of these forest communities, with the recognition that past management (e.g. wildfire suppression) has compromised their integrity, (if not the survival of these forests) and that climatic changes are factored in, I support ecologically based management within late-successional forests[1]/LSRs. As I listened to a FAC meeting held in December, I appreciated the regard given by some members of the committee to the consideration of fire ecology groups and landscape heterogeneity in management approaches.

2. Conservation and Predictable Commercial Objectives. Related to any management in these late-successional forests[2] , while there may be a commercial by-product associated with ecological management, the management should not have commercial objectives in late-successional forests. With ecologically based orientation as a guide, this could have applications in various age classes of late-successional forests. Related, the following [ldquo]Needs[rdquo] from page 6 of the NWFP Amendment Draft Environmental Impact (EIS) raises a question:

\* 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.

\* 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.

While I am not opposed to economic opportunities including logging, is the [ldquo]predictable supply of timber[rdquo] associated with any late-successional forests? If so, then the respective [ldquo]need[rdquo] statements quoted above, are inconsistent, not compatible. Within late successional forests, ecological management could result in commercial by-products but these products should not be a driver of the management or be a component of the [ldquo]predictable supply of timber[hellip].[rdquo] If referring to

commercial-driven activities in Matrix land allocations, again, this is not clearly exhibited in the document.

Related to the objectives of conservation as well as commercial outputs, the terminology used in the document needs to be updated and consistent throughout. One example is the mixed message implied on page 6 (and Alternative C, page 9) of the NWFP Amendment[mdash]associating conservation WITH a predictable supply of timber. If applicable to late successional stage forests, the two are not compatible. Another example of inconsistent verbiage brought up at the December Federal Advisory Committee (FAC) meeting was the use of the term [ldquo]logging[rdquo] in association with LSRs versus ecological [ldquo]stewardship[rdquo]. This mixed message continues into the language associated with alternatives considered but [ldquo]eliminated from detailed study[rdquo] (page 65). In the document it states that commenters recommended a moratorium on logging and harvest in mature and old-growth stands to ensure the preservation of these ecosystems. [ldquo]Logging and harvest[rdquo] have different orientations and objectives compared to ecologically-based forestry. Addressing the risk of wildfire to mature and old-growth forests, which has been exacerbated by climate change, is an important factor of the Notice of Intent. Using ecological forestry approaches to reduce this risk is necessary to ensure these ecosystems can persist into the future and continue to provide vital habitat for mature and old-growth associated species but this should not be paired with accommodating a predictable supply of timber? It was suggested that there be a glossary with terms defined; I think this is important AND how/where on the landscape they are applied consistently. the provision of a predictable supply of timber from Matrix lands in moist forests

1. Use of Wildland Fire: Fire suppression has led to increased stand density and thus fire severity in forests that evolved within historic fire regimes are no longer in keeping with natural fire return intervals. With ecologically based preparation intended to re-create stand or habitat conditions if fire had been allowed to burn (e.g. thinning, understory burning, pile burning)[3], landscape settings should be strategically identified for such preparation and consideration given to subsequent wildland fire use. While suppression has its place where there is concern for community safety or some infrastructure, can be detrimental to the ecology of forest and associated habitats. Furthermore, active ongoing thinning and/or burning is not sustainable. Let wildland fire do the job in those landscape settings.

2. Late-Successional Forests and/or Community Protection/Wildland-Urban Interface Priorities. While community protection/infrastructure is important, I have concern that management in community protection areas/wildland-urban-interfaces will take precedent over any planned ecological management in late-successional forests not proximal to such areas. An example is from Alternative B that includes a statement [ldquo]prioritizing wildfire risk reduction in areas that affect communities[rdquo].

Emphasis on community protection areas also ignores the reality that the density of forests adjacent to these areas could result in fire spreading into the protection areas. The agency[rsquo]s leadership commitment needs to include criteria for management priority that is not only community/infrastructure management oriented but

includes conservation of late-successional forests and the habitats in other landscape settings. Develop priorities and criteria for the different landscapes: a) late -successional forests in [ldquo]wildland[rdquo] settings and b) late-successional forests proximal to wildland-urban interfaces or community protection settings. Develop an alternative that distinguishes management approaches and priorities for community risk areas and a separate approach and prioritization criteria for late-successional forests (e.g. extent of missed fire return intervals) in relatively wildland landscapes.

Coordination across Forests and other land ownerships[mdash]a borderless approach[mdash]should be emphasized in the commitment as well. I would like to see the Forest Service interact on this topic and articulate prioritization that is focused on conserving biodiversity across all communities.

1. Survey and Manage Species. I have not been able to catch up on what is occurring relative to ongoing conservation and protection of late-successional forest associated species[mdash]the Survey and Manage category of species included in the original plan of 1994. While I can see situations where application of the Survey and Manage guidelines might not warrant consideration (e.g. Pechman exemptions), any option to remove Survey and Manage guidelines across the board should be denied. Related to settings of potential survey exemption, while coordination with tribes and incorporating Traditional Ecological Knowledge is merited, I disagree that landscape settings of tribal importance, that are not proximal to communities or infrastructure, be exempt from surveys. Species associated with late-successional forests are at risk regardless of where they occur so if a compromise is needed for community protection areas, so be it, but don[rsquo]t expand this exemption for tribal interests into late-successional forests associated with [ldquo]wildland[rdquo] settings.

Regarding the value of surveys for increasing our knowledge about late-successional forest dependent species, since the conception of the NWFP[rsquo]s Survey and Manage program, there has been much learned about a wide variety of species with [ldquo]alliances[rdquo] to late-successional forests. An example is displayed in the following clip from an internal Region 5 document entitled [ldquo]Survey and Manage Category B Fungi Strategic Survey Report[rdquo] file code 2600, July 13, 2020:

1. Alternatives B, C and D- Allowable [ldquo]Harvest[rdquo] and Stand Age. The reduction in stand age allowing for removal of trees in stands as young as 80 years could compromise the habitat characteristics associated with late-successional forests (e.g. reduction in canopy cover) which in turn could result in impact to wildlife and plant species associated with these mature forests. For some species, with limited dispersal capacity, removal could result in the extirpation of an occurrence. If the orientation is toward ecological forestry, based upon the extent of missed fire return intervals for example, then perhaps an 80 year-old stand might benefit from some thinning or burning, but using the age, 80 (or perhaps other age[hellip]) as a default, may fail to capture landscape setting

habitat variation. Field reconnaissance as well as analysis of missed fire return interval should be required before defaulting to the stand age of 80 years.

2. Restoration Opportunities. While conservation of intact late-successional forests is a concern across the Northwest Forest Plan area, opportunities to address other natural habitat settings has merit. Forest or invasive plant species encroachment into early successional habitats (e.g. oak woodlands) or restoring riparian habitats vulnerable to high intensity fires or choked with invasive plant species is of concern and expands the recognition of the ecological and perhaps cultural role these habitats provide. Some objectives and associated criteria for what and where to prioritize restoration is needed which would factor in the fiscal resources needed to implement sustainable restoration projects.

3. Monitoring. I am very glad that monitoring was identified in the document (page 65). It is essential to provide the scientific basis to guide future management/adaptive management and this should be brought up and prioritized consistently. At times, monitoring has not been acknowledged by Forest management (and associated budgets) as having enough value to put it in the program of work. I would hope monitoring of our land stewardship activities will be assigned to the leadership commitment so that it will be realized.

In closing, the expertise of the FAC members involved and the resulting products have covered much territory. This is appreciated. The topic is salient--the need to update the NWFP, to recognize the changed landscape conditions due to climate changes and some past forest management. I could see a hybrid alternative that includes aspects of Alternative B and Alternative C that addresses comments provided above. Late-successional forests do not warrant a [ldquo]hands-off[rdquo] approach in all settings, to the contrary, ecologically-oriented land management possibly paired with wildland-fire use will be essential to ensure that late-successional habitats and the species they support are not threatened and continue.

Sincerely,

[1] [ldquo]Late-successional forests[rdquo] as used in my comments equates to [ldquo]mature and old-growth forests[rdquo][mdash]a term used in the document.

[2] It is recognized that late-successional forests can occur across various land allocations such as community protection areas/wildland-urban-interfaces. In such areas, management approaches would need to evaluate and balance community protection from wildfires with conservation of late-successional habitats (e.g. thinning understory vegetation to reduce fire spread and potential mid-canopy/upper canopy ignition versus a [ldquo]default[rdquo] management approach that includes cutting mature trees. A possible management orientation would be to make the forest less vulnerable to high severity fires).

[3] This approach would be applied to a variety of habitats such as a need to thin conifer trees that have encroached upon oak woodlands prior to wildland fire use.

ATTACHMENT-LETTER TEXT: NWFP\_\_Comments\_Hoover\_03162025.docx; This is the same content that is coded in text box; it was also included as an attachment