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Regional Forester

U.S. Forest Service

1220 SW 3rd Avenue, Ste. G015 Portland, OR 97204

Submitted via online portal (<https://cara.fs2c.usda.gov/Public/CommentInput?Project=64745>)

Re: Comments of Douglas County on Northwest Forest Plan Amendment

On behalf of the Douglas County Board of Commissioners ("Douglas County"), please accept the following comments on the U.S. Forest Service's Northwest Forest Plan Amendment Draft Environmental Impact Statement ("DEIS"). As Douglas County explained in its comments submitted February 1, 2024, the 1994 Northwest Forest Plan ("NWFP") has been a travesty in nearly every respect: in forest management for rural communities; forest diversity; threatened and endangered species; ecosystem health and resilience; native species; and more. For the past 31 years the forests subject to the NWFP have experienced increased rates of severe wildfire, depleting biodiversity, and significant declines in wildlife populations, including in the species the NWFP was chiefly concerned with protecting. Meanwhile, rural, timber-dependent communities have been burdened by the substantial decrease in sustainable timber that has been sourced from the NWFP area. In short, the NWFP has exacerbated forest health issues, harmed native species, contributed to declines in threatened species, and has harmed rural communities by heavily limiting the harvest of forest products.

Douglas County appreciates that the Forest Service exhibited at least some awareness of these issues in its 2020 Biological Assessment of Northwest Forests. However, the DEIS fails to take steps necessary to limit, or even reverse, the woeful, worsening state of the Northwest's federal forests. There is an incredible opportunity before this agency[mdash]an opportunity to re-write what has been, by all accounts, a failed policy; an opportunity to bring economic prosperity to rural communities; an opportunity to reduce reliance of foreign timber supplies; an opportunity to curb annual catastrophic wildfires; and an opportunity to revitalize federal forests for all the native wildlife species that use them. Unfortunately, it appears that these opportunities are being lost in favor of an "amendment" that will retain the same failed policies that have been in place for over three decades. Douglas County implores the Forest Service to do better, and to re-write the Northwest Forest Plan with clear, obtainable, timber-based objectives, and wildlife habitat goals which focus on holistic needs of all species.

Background

Douglas County is located in heavily-forested southwestern Oregon with approximately 110,000 residents. The County extends from the Pacific Ocean to 9,182-foot Mt. Thielsen in the Cascade Mountains. The economy of Douglas County is largely dominated by its vast timber resources. Douglas

County contains nearly 2.8 million acres of commercial forest lands, including forests managed by the U.S. Forest Service ("Forest Service"), the Bureau of Land Management ("BLM"), private forest manufacturing and management firms, small landowners, and the County itself. Over 50% of the land area in the County is owned by the federal government and managed by the Forest Service or BLM, including lands owned and managed by the BLM under the Oregon and California Lands Act (O&C Lands).

Douglas County has experienced first-hand the decline of the timber industry in recent decades. Historically, the County received funds from the federal government tied to Forest Service and BLM timber sales. The federal government used a revenue-sharing formula from activities on federal land to partially compensate counties for the presence of untaxable, publicly owned land. However, timber harvest on federal lands has fallen dramatically, from 800 million board feet (mmbf) in 1989 to less than 90 mmbf in 2020, largely as a result of regulatory burdens, such as the listing of endangered and threatened species, designations of critical habitat, wild and scenic river designations, and the Northwest Forest Plan, which limits timber harvest opportunities. The negative, direct economic impacts to the County itself, and the negative socio-economic impacts across all the rural communities within the County, cannot be overstated. The human impacts have been drastic, far-reaching, and long-lasting.

Restrictions on forest management have also had a dramatic impact on wildfires. Limited harvest of green timber, as well as the limited salvage of burned timber, has led to an overstocking of the land base and a substantial increase in fuel loads and, consequently, large-scale wildfires. For instance, in the summer of 2013, the Douglas Complex Fire burned 48,679 acres to the north of the city of Glendale. That same summer, the Whiskey Fire burned 17,891 acres of forest in Douglas County in the Umpqua National Forest near the Loafer Timber Sale Project. In the summer of 2015, the Stouts Creek Fire burned 26,452 acres located to the south of the Loafer Timber Sale project. In the summer of 2017, the North Umpqua Complex Fires burned over 64,000 acres. In 2019, the Milepost 97 Fire burned 13,119 acres. During the extraordinary fire season of 2020, the Archie Creek Fire and Thielsen Fire collectively burned 141,517 acres. In 2021, fires in Douglas County burned another 140,000 acres, almost entirely on Federal land. And, in 2024, the Umpqua National Forest was almost entirely closed for months on end as wildfires burned 60,000 acres.

The fires that devastate our forests and local economies also pose a significant threat to public health. These serious health impacts are an environmental justice issue that many rural counties throughout Oregon face because of the federal government's failure to responsibly manage forests, due, in large part, to unnecessary and/or unwarranted restrictions that center around critical habitat and the Northwest Forest Plan. In short, forest-management straying further from harvest opportunities has been nothing short of a complete failure and unmitigated disaster for the economies and social fabric of rural Western Oregon communities, and Douglas County is the epicenter of this catastrophe.

Forest management is a complex issue which has a substantial impact on rural communities. In this context, forest management is certainly not limited to the harvest and sale of forest products. Rather, controlled burns, danger tree removal, timber harvests, fuel reduction projects, road restoration, and more play a crucial role in creating a healthy forest. Therefore, Douglas County is often a proponent of projects

which enhance forest resilience and diversity, which often involve the use of commercial harvests to improve stand densities, open up habitat for wildlife, and improve wildfire resilience. Douglas County is of the overarching view that commercial timber harvest is a crucial tool which needs to be utilized to achieve the long-term forest health and sustainability which benefits all persons and species dependent on our national forests.

Comments

A. Incorporating the Comments of Douglas Timber Operators and the American Forest Resources Council.

Douglas Timber Operators ("DTO") and the American Forest Resources Council ("AFRC"), organizations representing forest products manufacturers, loggers, truckers, and more timber-adjacent enterprises, have submitted detailed comments on the DEIS, what it means for rural, forestry-dependent communities, and the steps the Forest Service should take to achieve measurable improvements in forest health, sustainability, and productivity in the years to come. Douglas County fully joins, incorporates, and supports the comments of DTO and AFRC, and urges the Forest Service to make the amendments requested in those comments.

B. Improving Forest Resiliency Must be at the Forefront of the Forest Plan Amendment.

The prevalence and scope of severe wildfire in the western Cascades, particularly in Douglas County, has been cataclysmic over the past 10 years. A snapshot of the fires which have devastated the Umpqua National Forest and O&C Lands in eastern Douglas County during this time period tells the story:

[Image with the following text: The highlighted areas in the image at left depicts just a portion of the major fires that have burned in Douglas County in the last ten years. -- SEE PDF]

Since the turn of the century, hundreds of thousands of acres, if not millions of acres, have burned on the western slope of the cascades in Douglas County. The above image paints a dreary picture of the environmental catastrophes Douglas County has dealt with in recent years. Unfortunately, the reality is much worse. Residents of Roseburg and the Umpqua Valley, Douglas County's most populous region, have become accustomed to seeing the summer sun clouded with smoke and the Valley's rolling hills cloaked in a dense haze. Air quality for much of the summer sits at hazardous levels while the County's economy and infrastructure suffers from years of declining revenues. Within the Umpqua National Forest, firefighting has become as big of a business as actual forest management, and wood products processors scramble to buy up available logs to keep their mills running.

When the Forest Service authored its 2020 Bioregional Assessment of Northwest Forests in July of 2020, it acknowledged the need to improve forest resiliency to wildfire across the NWFP planning area. Little did the Forest Service know that its assessment was simply a prediction of what was about to occur. It goes without saying that the 2020 fire season was one of the worst in Oregon's recorded history, as the Archie Creek and Thielsen fires burned over 140,000 acres, and were just a couple of the many similarly-sized fires that ravaged the western cascades. In Douglas County, the 2021 fire season was not much of an improvement, burning another 140,000 acres. And in 2024, the Umpqua National Forest reported that 60,000 acres were burned. Forest Service, https://www.fs.usda.gov/Internet/FSE_DOCUMENTS/fseprd1210786.pdf. All told, since the 2020 Bioregional Assessment was released, well over $\frac{14}{10}$ million acres have burned in Douglas County, much of this within the Umpqua National Forest. Not only is this disastrous from an ecological and public health standpoint, it also creates tremendous firefighting costs for the U.S. taxpayer.

The 1994 Northwest Forest Plan is largely to blame for creating the forest conditions that exacerbated these wildfires. As the 2020 Assessment acknowledged, the NWFP created a one-size-fits-all management policy centered around protecting and increasing spotted owl habitat, without acknowledging how that management policy would create unhealthy forest stocking rates, a decrease in forest complexity and diversity, and an overarching worsening of wildfire risks and forest resilience. While initially the quantity of spotted owl habitat may have improved by around 3% during the first 25 years under the NWFP, this gain and more was lost in the recent catastrophic fire seasons. Thus, the NWFP's focus on protecting spotted owls backfired by exacerbating wildfire frequency and intensity, resulting in less habitat today than there was 30 years ago. See Range-wide declines of northern spotted owl populations in the Pacific Northwest: A meta-analysis, Elsevier (July 2021) <https://doi.org/10.1016/j.biocon.2021.109168>; Northern Spotted Owl Still Fights for Survival, U.S. Geological Survey (Oct. 6, 2021) <https://www.usgs.gov/news/featured-story/northern-spotted-owl-still-fights-survival>.

Substantial changes in management need to be made to address the wildfire trend in the planning area. While the fires which have ravaged the Cascades over the past decade cannot be reversed, the Forest Service can make efforts to ensure that future fires do not spread out of control, and that forest visitors and firefighters are safe.¹ The most effective and economical solution to this wildfire crisis is to increase the utilization of commercial harvest across the NWFP area, allowing overstocked stands of trees to be harvested, fuel breaks to be created, and grasslands to be restored. Even if actions like these could have short-term adverse effects on listed species, like the spotted owl, the Forest Service must acknowledge that wildfire risk mitigation through commercial harvest is a proactive management tool which directly addresses a leading spotted owl risk factor.

Studies have shown that mechanical thinning alone can alleviate wildfire risks, and when paired with other management strategies, such as post-thinning controlled burns, can dramatically improve wildfire resilience. See Johnston, James et al., Mechanical thinning without prescribed fire moderates wildfire behavior in an Eastern Oregon, USA ponderosa pine forest, *Forest Ecology and Management* (Dec. 1, 2021); Graham, Russell et al., Effects of Thinning and Similar Stand Treatments on Fire Behavior in Western Forests in Western Forests, Utah State University (1999). Therefore, the Forest Service must adopt a plan which requires the implementation of commercial harvest and other management strategies to reduce fuel loads and address extreme wildfire behavior.²

Ultimately, the Northwest Forest Plan Amendment must utilize more management strategies that

¹ These efforts may also improve wildlife habitat. Recent science has shown that acreage burned at high severity no longer provides suitable habitat for species such as the spotted owl. See Jones et. al., Megafire causes persistent loss of an old-forest species, *ZSL* (May 9, 2021) <https://doi.org/10.1111/acv.12697>. Preventing future severe fires through the creation of fuel breaks can benefit these species.

² The plan revision must acknowledge that in today's society, natural wildfire regimes—especially in the western Cascades—are unacceptable. That is, society cannot coexist with natural wildfire regimes by letting fires run their course. The human risks of letting a fire burn are far too great, especially when the Forest Service has the tools to fight fires. Thus, the plan revision must account for wildfire suppression as a persistent factor in forest health. This, in turn, will result in overstocked forests unless the Forest Service proactively manages its forests—through timber harvests, controlled burns, etc.—to alleviate concerns created by ongoing fire suppression.

are designed to create measurable improvements in wildfire resilience and forest health. To meaningfully create forests that have healthy stocking levels as well as insect, drought, and wildfire resilience, the NWFP Amendment must significantly increase the use of commercial harvest across the entire plan area.

C. Commercial Harvest is Critical for Ecosystem Diversity.

The 2020 Bioregional Assessment acknowledges that a loss of ecosystem diversity has been a consequence of the one-size-fits-all management strategies piloted by the NWFP. Douglas County agrees. The NWFP's singular focus on creating forests which were purported to benefit spotted owls and other "old growth dependent" species had the opposite effect by increasing wildfire risks (discussed above) and eliminating the diverse ecosystems which are critical to healthy forests.

The loss of ecosystem diversity was foreseeable under the NWFP. The near-exclusion of commercial timber harvest from the plan area, and the complete exclusion of regeneration harvest methods, eliminated forest openings crucial to wildflowers, insects, birds, and megafauna, such as deer, elk, mountain lions, and wolves. See, e.g., Rowland, Mary et al., Modeling Elk Nutrition and Habitat Use in Western Oregon and Washington, Wildlife Monographs (Oct. 23, 2018) (explaining that Roosevelt elk across the NWFP area are limited by nutrition availability, and that forage within Forest Service lands has decreased substantially due to a lack of timber harvest, causing declines in elk habitat quality); Roosevelt elk population estimate and herd composition in Oregon, 2018 - 2023, Oregon Department of Fish and Wildlife, https://www.dfw.state.or.us/resources/hunting/big_game/controlled_hunts/docs/hunt_statistics/23/Roosevelt%20Elk%20Population%20Estimates%20and%20Herd%20Composition%202018%20-%202023.pdf (recording downward trends in Roosevelt elk populations, especially in hunting units containing substantial amounts of land managed under the NWFP. For instance, in the Santiam, McKenzie, Indigo, and Dixon units of Oregon's western Cascades, elk populations are in continuous decline and far under management objectives). This lack of diversity contributes to a loss of overall ecosystem function, wherein even the old growth dependent species are harmed when management strategies focused on "creating" old growth result in the depletion of other plant and animal species.

Once again, the Forest Service must acknowledge and account for the failures of the NWFP, and adopt management strategies aimed at reversing the NWFP's shortcomings. With regards to ecosystem diversity, the NWFP failed by utilizing a one-size-fits-all strategy that was singularly focused on protecting and "creating" "old-growth" ecosystems. This allowed natural meadows to become enclosed, caused a significant reduction in forest openings, and ultimately contributed to declining populations of once- abundant plant and animal species.

The most sustainable and economical solution to this self-made issue is to reverse the policy decisions that led to the loss of ecosystem diversity. That is, rather than exclude commercial timber harvest from much of the NWFP area, embrace the benefits that well-planned harvest units bring. Through thinning, variable density harvest, and even regeneration harvest, the Forest Service can bring back natural meadows, improve wildlife forage, reinvigorate plant and animal communities, and create a diverse,

sustainable forest for all species. Timber harvest can create habitat for rodents, increase wildflowers and pollinators, improve depleted megafauna habitat, and more. Timber harvest is the key to improving ecosystem diversity, and the Forest Service has the ability to utilize timber harvest in combination with scientific studies about the need for diverse habitats to generate a forest plan that benefits a wide array of interests. Ultimately, this will require increasing timber harvest and eliminating timber harvest restrictions across the NWFP area so that the Forest Service has the flexibility to utilize commercial harvest management strategies in a manner which will create a more diverse landscape and ecosystem. There is a need for holistic management that can satisfy the habitat requirements of all the species within the Northwest national forest system, but this requires more management flexibility than is proposed under the DEIS. Furthermore, it is imperative to increase and implement timber production requirements to ensure that habitat conditions are being improved over time.

D. Forest Products are Underutilized to the Great Detriment of Rural Communities and Ecosystem Resilience.

The 2020 Bioregional Assessment recognizes that forest products[mdash]specifically timber harvest[mdash] have been underutilized under the NWFP. As discussed in the 2020 Assessment and above, this has had an array of negative impacts, from fire to a loss of biodiversity. Moreover, the underutilization of forest products has devastated local timber-dependent communities, and is contributing to the national shortage of affordable housing by placing supply pressures on the United States' lumber market. See Steve Courtney, Are You Planning For The Reduction In Northwest Timber Supply?, ResourceWise (March 10, 2022) <https://www.forest2market.com/blog/are-you-planning-for-the-reduction-in-northwest-timber-supply>.

The NWFP called for the harvest of 1.1 billion board feet per year across the planning area. Over the NWFP's lifetime, timber harvests have never come close to that amount. No party[mdash]plant or animal[mdash] has benefited from the loss of timber harvest, as it has caused great harm to rural communities, exacerbated wildfire risks, and depleted biodiversity. Douglas County has been ground zero to these impacts. The County has experienced the harm that follows from the near-elimination of timber utilization on Forest Service lands, watching timber related income dwindle in resource-dependent communities. Not only has this resulted in declining revenues for counties but it also represents lost revenue and economic opportunity for the U.S. Treasury. These forests should be making money for the U.S. Treasury and counties; instead, under the NWFP, they have become massive economic liabilities.

Now it is necessary that the Forest Service make up lost time. The systematic underutilization of timber harvest in areas specifically reserved for harvest under the NWFP has exacerbated the wildfire and biodiversity challenges discussed above, and harmed rural communities. The Forest Service has over a ten-billion board feet backlog of timber that should have been harvested under the NWFP, but wasn't. Now, the Forest Service needs to plan to make up that backlog over time in its NWFP revision, while also increasing the utilization of timber harvest in other areas. The Forest Service must implement a policy that includes harvesting the backlog of timber within the planning area.

Moreover, the Forest Service must ensure that timber products will not be underutilized once again in the wake of any plan revision. The NWFP has done enough damage to communities and the environment, and the Forest Service must now address and alleviate that harm. Allowing forest products to continue to be underutilized across the planning area would be a policy failure. The Forest Service must be explicit in its plan amendment to ensure that areas identified for timber management are harvested on a sustainable and reliable basis.

E. A Variety of Other Issues Need Analyzing.

There are many other issues and topics which need to be addressed in a revision to the NWFP. For instance, the increased use of regeneration harvest must be evaluated. Regeneration harvest has a multitude of benefits, such as replicating natural meadows or fire scares, or increasing solar radiation in select locations within national forests which allows different plant communities to thrive. This can specifically benefit wildflowers, grasses, pollinators, and large ungulates like deer and elk which require the forage typically found in forest openings. Moreover, regeneration harvest allows a higher utilization of select areas of a forest, which can allow the Forest Service to harvest more timber volume with smaller areas of disturbance. The revision of the NWFP must specifically analyze the use of regeneration harvest as a forest management strategy and adopt a policy which recognizes regeneration harvest as a specifically authorized strategy to meet planning goals.

The NWFP revision also must specifically address the issues caused by fir encroachment in meadows and how those issues could be resolved through commercial harvest. Similarly, the NWFP revision must specifically analyze how elk and deer habitat and populations have changed under the NWFP, recognize the issues caused by reduced forest openings, and create a plan for the improvement of elk and deer summer and winter habitats through commercial timber harvest.

The NWFP Amendment also needs to allow increased salvage harvest of burned or dead trees. Salvage harvest is necessary to improve forest safety, wildfire resilience, and to generate income from otherwise-devastated ecosystems. The NWFP Amendment should allow the Forest Service to utilize quick, aggressive salvage harvest strategies whenever forests are affected by wildfire or increased rates of tree mortality. While the retention of snags is important, thousands-upon-thousands of acres of dead snags provide no benefit, and only exacerbate the risk of severe wildfire.

F. The Current NWFP Amendment Fails to Make These Vital Changes.

There are sweeping changes which need to be made under the Northwest Forest Plan Amendment to reverse the harms caused by the last three decades of failed policy and to ensure that the next decades bring prosperity, vitality, and ecological diversity to the Northwest national forest system. Unfortunately, under the currently-proposed Northwest Forest Plan Amendment, the Forest Service will continue to walk headlong into the same failures of years past, without learning from the agency's mistakes.

For instance, the DEIS proposes to reduce the amount of acreage that could be managed for sustainable timber harvest by establishing new desired conditions for moist Matrix lands[mdash]an arbitrary approach that is not rooted in sound science or good policy. The DEIS also largely prohibits the salvage of burned timber. As explained here, under the current trend the Forest Service should continue to expect hundreds of thousands of acres of Northwest national forest system lands to burn annually. In 2024, many of the fires in the Umpqua National Forest, like those in the Boulder Creek Wilderness, re-burned lands that had already been affected by catastrophic wildfires, including lands that have burned twice in the past two decades. An inability to salvage burned forestlands will exacerbate the vicious wildfire cycle that is already in place. The DEIS also fails to include directives which would require that lands available for timber harvest actually be harvested. The DEIS predicts increases in timber harvests, but these are empty promises without mandatory directives that require harvests at predictable, sustainable levels. Douglas County knows all too well what will happen if harvest is promised, but not required[mdash]the Forest Service will be unable to ever meet its timber volume goals, exactly as happened

under the Northwest Forest Plan.

At this point, Douglas County envisions one clear path forward: a re-write of the DEIS, development of new alternatives, and a fresh look at the needs of northwest forests, communities, and wildlife. Without substantial changes to the management of these forests, the United States' reliance on foreign timber will grow, the ongoing depression of rural communities will continue, and forests will be transformed to charred moonscapes, incapable of supporting jobs, recreation, wildlife, or any hope of a better future.

Conclusion

Douglas County urges the Forest Service to acknowledge the many failures of the NWFP, and use the plan revision process as an opportunity to fix the Forest Service's previous mistakes. Most of all, Douglas County urges the Forest Service to increase the use of commercial timber harvest as a tool to address the wildfire, ecosystem diversity, and utilization issues that all flowed out of the NWFP.

Douglas County appreciates the opportunity to submit these comments for the agency's consideration.

Sincerely,

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Douglas County Commissioner

[] Carollo Law Group

Special Counsel to Douglas County

ATTACHMENT-LETTER TEXT: 3.17.25 Douglas County NWFP Comments.pdf; this is the same content that is coded in text box; it was originally included as an attachment