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USDA Forest Service

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Submitted via webform: https://cara.fs2c.usda.gov/Public//CommentInput?Project=64745

RE: Comments on the Northwest Forest Plan Amendment Draft Environmental Impact Statement

Dear Regional Forester Buchanan: March 17, 2025

On behalf of Silvix Resources, CalWild, Cascade Forest Conservancy, Conservation Northwest, Klamath-Siskiyou Wildlands Center, Methow Valley Citizens Council, National Parks Conservation Association, The Wilderness Society, and our supporters and members across the Pacific Northwest, we write in support of Alternative B of the Northwest Forest Plan (NFP) amendment as modified1 by our comments and augmented by some components of Alternative D. In our view, "Alternative B+" represents an important step forward for old forest conservation, wildfire resilience, climate change adaptation, and socioeconomic vitality that also centers Indigenous perspectives in proactive stewardship2 of the national forests in the Northwest Forest Plan region.

I. Introduction.

Spanning 24 million acres across Washington, Oregon, and California, the NFP is the world's first ecosystem management plan, setting out to protect and restore fish and wildlife habitat and support local communities. Overall, we're on track, but climate change is now amplifying fire, drought, and flood events, and we must adjust. Furthermore, instructive new scientific and monitoring information has been collected, compiled, and published, and it is important for adaptive management to incorporate new information and knowledge into management plans. We also must include Indigenous knowledge and co-management actions and practices in the NFP that uphold tribal treaty rights and were not previously considered.
II. Landscape Characterization.
The 1994 NFP roughly divided the forested landscape into "moist" and "dry" bins and differentiated management of these forests accordingly. The proposed amendment follows this dichotomy, although this approach is necessarily coarse and does not fully address the complexity of forests: no stand is either moist or dry - all stands contain moister or drier

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1 Deleted text is identified in red strikethrough whereas new text appears in green.

2 We understand "proactive stewardship" to mean "the anticipation future problems, changes, or needs and the intentional choosing of an appropriate responsive strategy or strategies, whether involving active interventions and/or passive/custodial approaches, that are intended to sustain a forest's ability to supply any good, benefit, or value for present and future generations."

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portions. Indeed, most forests are "intermediate" or "mixed" in terms of their level of moisture, growth potential, and disturbance regimes.

While we would welcome a third category of forest type in addition to moist and dry in the amendment, we recognize that developing plan components for the management of such a category would be extremely difficult specifically because of the complexity of forest stands. Instead of attempting to identify a third forest type, we propose that the Forest Service refine the plant association groups (PAGs) the agency currently uses to identify stand type and use these PAGs to sort stands into the moist or dry bin.

III. Barred Owl Management.
The NFP was developed in large part to conserve the northern spotted owl. Despite the conservation measures in the 1994 Plan, populations of the owl continue to decline.3 In addition to habitat loss from timber harvest and disturbance, the spotted owl is threatened with extinction due to competitive pressure from the barred owl, a voracious and invasive species to the Pacific Northwest. The United States Fish and Wildlife Service recently completed the development of a barred owl control program, which relies on voluntary implementation by federal and non- federal landowners, including the Forest Service.4 In order to ensure Forest Service participation in the barred owl control program, we suggest that the Forest Service include the following new Objectives:

FORSTW-ALL-OBJ-02 Annually conduct barred owl removal in northern spotted owl site management locations, General Management Areas, Focal Management Areas, and Special Designated Areas.

FORSTW-ALL-OBJ-03 Within 5 years, remove all barred owls from all Priority A and Priority B spotted owl nest sites.

FOREST-ALL-OBJ-04 Within 10 years, remove barred owls from all Priority A and Priority B General Management Areas and Priority C and D spotted owl nest sites.

FOREST-ALL-OBJ-05 Within 15 years, remove barred owls from all Priority C, D, and E General Management Areas, and Special Management Areas

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3.A.B. Franklin, K.M. Dugger, D.B. Lesmeister, R.J. Davis, J.D. Wiens, G.C. White, J.D. Nichols, J.E. Hines, C.B. Yackulic, C.J. Schwarz, S.H. Ackers, L.S. Andrews, L.L. Bailey, R. Bown, J. Burgher, K.P. Burnham, P.C.

Carlson, T. Chestnut, M.M. Conner, K.E. Dilione, E.D. Forsman, E.M. Glenn, S.A. Gremel, K.A. Hamm, D.R. Herter, J.M. Higley, R.B. Horn, J.M. Jenkins, W.L. Kendall, D.W. Lamphear, C. McCafferty, T.L. McDonald, J.A. Reid, J.T. Rockweit, D.C. Simon, S.G. Sovern, J.K. Swingle, H. Wise. Range-wide declines of northern spotted owl populations in the Pacific Northwest: A meta-analysis Biol. Conserv., 259 (2021),10.1016/j.biocon.2021.109168

4Final Environmental Impact Statement, Record of Decision, and Final Barred Owl Management Strategy, available at https://www.fws.gov/project/barred-owl-management.

IV. Tribal Inclusion Plan Components.

The 1994 NFP did not honor the federal government's Trust responsibility owed to more than 80 Tribal nations located within the range of the northern spotted owl: there are no plan components addressing Indigenous knowledge, Tribal Treaty rights, or the myriad cultural, natural resource, workforce, and other issues of importance to Tribes. Alternative B corrects this failing, and we strongly support the inclusion of all Tribal Inclusion plan components in the final amendment.

We note that the DEIS could have provided a better discussion of the socioecological effects of the Tribal Inclusion plan components. These components collectively form the necessary framework for advancing Tribal access and gathering, preserving biodiversity, facilitating co- stewardship, incorporating Indigenous Knowledge, honoring treaty and protected Tribal rights, fostering workforce development, and improving interagency coordination. The Final Environmental Impact Statement (FEIS) should explicitly highlight the major differences between the No Action Alternative and Alternative B's Tribal Inclusion plan components, as this comparison is essential for understanding how the final amendment would advance the federal Trust responsibility and support Tribal sovereignty. We urge the Forest Service to expand the Tribal Inclusion section of the FEIS to provide a more comprehensive analysis that reflects the breadth and importance of the Tribal Inclusion plan components. This will ensure that the final analysis accurately captures the scope of Tribal priorities and the impacts of the proposed amendment on Tribes.

A. Redline Plan Components - Alternative B.

We offer the following suggestions, which are derived from those of the Fire Generation Collaborative and the NFP Federal Advisory Committee, to better reflect Tribal priorities and the centering of Indigenous perspectives in the amendment.

TRIBAL-AG[begin strikeout]-DC[end strikeout][begin added text]STD[end added text]-01 Tribes are supported to practice traditional, cultural, and religious activities such as plant gathering, animal and fish harvest, and ceremonial activities to help sustain their way of life, cultural integrity, social cohesion, and culturally appropriate stewardship economies.

This plan component should be a Standard to reflect its obligatory nature.

TRIBAL-BIO-DC-01 Beaver habitat is maintained or restored to promote improved beaver presence in watersheds [begin added text]in populations sufficient to fulfill their ecological function [end added text] to benefit ground water, surface water, and aquatic habitat complexity to support the conservation and recovery of imperiled aquatic species.

This revision reflects that beaver populations should be maintained at levels sufficient to allow beavers to play their role in the ecosystem, not just for the benefit of imperiled aquatic species.

TRIBAL-BIO-OBJ-01 With relevant and interested Tribes, co-develop actions in priority watersheds that will maintain or restore soil and watershed conditions on 3,000 to 4,000 acres every 3 years across the Northwest Forest Plan area, [begin added text] Including through system and non-system road decommissioning and increased use of tribally-led cultural burning. [end added text]

This addition more specifically reflects the type of activities that should occur to meet Desired Conditions.

TRIBAL-BIO-GDL-01 To honor treaty and other tribal rights, Forest Service staff in the plan area should [begin added text] prioritize[end added text] engaging early and sustain staff to staff [begin added text]consultation, [end added text] coordination, and collaboration with relevant Tribes, in planning, monitoring, and management activities related to federally listed threatened and endangered species and other plant and animal species of interest to Tribes.

These additions better elevate the importance of Forest Service engagement with Tribes and adds an omitted mode of engagement.

TRIBAL-BIO-[begin strikeout]PMA[end strikeout][begin added text]GDL-XX [end added text]Consult and coordinate with Tribes to identify priority and suitable riparian habitats to maintain or restore for beaver re-introduction or expansion.

This plan component should be a Guideline rather than a Potential Management Approach to ensure that this valuable ecosystem service is achieved.

TRIBAL-BIO-PMA Work with relevant federal, [begin strikeout]and[end strikeout] state, [begin added text]and Tribal[end added text] agencies to coordinate authorities and resources to effectively manage threats to imperiled species.

TRIBAL-BIO-PMA Work with USFWS, [begin strikeout]and[end strikeout] NOAA-NMFS, [begin added text]and Tribes[end added text] to address urgent environmental threats to habitat of listed species through the informal and formal ESA consultation procedures to achieve long-term species resiliency.

Tribes are an important partner in the management of listed and at-risk species: these edits reflect the inclusion of Tribes in this effort.

TRIBAL-FORSTW-DC-01 National forests in the Northwest Forest Plan area coordinate, consult, and collaborate with Tribes, and work with Tribes to establish a co-leadership role in the context of a co-stewardship agreement to restore, promote, and enhance traditional cultural use species [begin added text]including but not limited to culturally significant species used for food, fuel, fiber, construction (e.g. for canoes or traditional lodges) of cultural items, medicine, regalia, artisanal, spiritual, and ceremonial purposes. Ensure these species are accessible to tribal members while maintaining ecological integrity and connectivity.[end added text]

The added narrative is more specific to the types of uses to which cultural use species may be put, and provides for Tribal access to these species.

TRIBAL-FORSTW-DC-09 Cultural burning is recognized as a traditional tribal practice that has existed for millennia and is rooted in [begin added text] Tribal laws and [end added text] Indigenous Knowledge, practice, and belief systems. Cultural burning is a sovereign tribal right and responsibility. National forests in the Northwest Forest Plan area [begin strikeout]willseek to[end strikeout] accommodate [begin strikeout]and create conditions conducive to[end strikeout] cultural burning and coordinates, consults, and collaborates with Tribes to create conditions conducive for this Tribal sovereign practice address the appropriate means forTribes to engage in cultural burning.

These changes reflect the expectation that national forests within the range of the owl actually accommodate (as opposed "seek to" do so) cultural burning and create the opportunities for cultural burning to occur.

TRIBAL-FORSTW-DC-11 National forests in the Northwest Forest Plan area support tribal interests in food sovereignty for all Tribes and Tribal people.

This alteration reflects that Tribal people - not merely a group of Indigenous individuals organized into a discrete body (or, "Tribe") - are the beneficiaries of food sovereignty.

TRIBAL-FORSTW-STD-XXGOAL-02Consult and coordinate with Tribes to identify culturally relevant characteristics of mature and old growth habitats associated with cultural use species and develop management strategies through co-stewardship agreements to promote, enhance and

recruit culturally important plant, animal, and fungi communities in desired growth forms and locations.

Shifting this plan component from Goal to Standard reflects the degree of compliance appropriate for the sustainability of mature and old growth forests which is a foundational element of the NWFP development.

TRIBAL-FORSTW-OBJ-03 Annually implement projects that increase populations or maintain or restore habitat for dry, serpentine, and wet meadow-associated culturally significant species, such as camas or other species identified through consultation with interested Tribes, by 2,000 acres across the Northwest Forest Plan area.

This change reflects the need to consult with Tribes regarding which culturally significant species should be restored, rather than leaving this determination to the Forest Service.

TRIBAL-FORSTW-OBJ-04 Each unit across the NWFP area, enters into one or more government-to-government agreement(s) with Tribes to co-design, plan and implement habitat enhancement projects for culturally significant species and practices through processes that respectfully engage Indigenous knowledge and values while both promoting Tribal workforce capacity and protecting Tribal data sovereignty and culturally sensitive information about culturally significant species, places, and practices. Develop an implementation strategy for NHPA section 304 on confidentiality (54 USC [sect] 307103) that responds to tribal needs to protect the confidentiality of religious practices.

This insertion more specifically describes the process and expected outcomes from Forest Service engagement with Tribes.

TRIBAL-FORSTW-STD-03 Proposed practices and management activities shall uphold treaty and other tribal rights of all Tribes and the federal trust responsibilities owed to all Tribes and Indigenous Peoples regardless of treaty status.

This addition is intended to recognize that not all Indigenous people are organized into Tribal units, and reflects the federal government's Trust responsibility owed to these individuals.

TRIBAL-FORSTW-GDL-03 To allow tribal access to first foods and culturally significant botanical species,

collection of special forest products should not be permitted or should be limited if, after consultation with the relevant tribal governing body, the relevant Tribal governing body national forests in theNorthwest Forest Plan area determines it may result in significantly interfering with a Tribe's access to culturally important resources. If access or gathering is authorized, such activities should minimize conflicts with the exercise of treaty and other protected tribal rights protected by federal law.

These alterations reflect that it is Tribal governments, not the Forest Service, who should determine whether collection of special forest products would compromise Tribal access to first foods and culturally important botanical species. This kind of determination must be made by the Tribes themselves based on metrics relevant to Tribes, not a decision (or lack thereof) made by the agency.

TRIBAL-FORSTW-GDL-04 Throughout the government-to-government consultation process, national forests in the Northwest Forest Plan area should provide for the free use, without permit, of culturally significant plants by Tribes and tribal members for traditional native cultural gathering. Agreements or other instruments are encouraged to support such gathering.

This plan component omitted an important word included here.

TRIBAL-FORSTW-PMAGDL-XX Work with Tribes to identify needs and opportunities to restore cultural resources, including those covered under the National Historic Preservation Act and National Environmental Policy Act.

Consider whether treatments such as burning or vegetation modification are appropriate to conserve or achieve restoration, including around plant species composition and condition, rather than avoidance.

TRIBAL-FORSTW-PMAGDL-XX When desired by Tribes, the Forest should appoint one or more Cultural Burn Liaison(s), designated jointly with relevant tribal nations, to ensure treaty and reserved rights and trust responsibilities are upheld.

Shifting these plan components from Proposed Management Approaches to Guidelines reflects the degree of compliance appropriate for these topics.

TRIBAL-FORSTW-PMASTD-XX Upon a Tribe's request, the Forest shall strive to enter into at least one memorandum of agreement or other formal instrument with each Tribe with treaty or other protected tribal rights on each national forest in the Northwest Forest Plan area pertaining to fire co-stewardship, cultural burning, cultural heritage and resource monitoring, wildfire management, wildfire risk reduction, and post-fire recovery.

TRIBAL-FORSTW-PMASTD-XX Management activities should shall consider Indigenous and western scientific research and ethnographic research related to relevant tribal cultural land-use activities and interests when analyzing project effects. Ensure that no adverse effects are caused to any treaty and other tribal rights, sacred places, practices, or elements of the landscape identified as culturally important to relevant Tribes.

These plan components should be Standards to reflect the degree of compliance appropriate for these topics. If a Tribe requests the development of a co-stewardship agreement, MOU, or other instrument, the Forest Service has a Trust and Treaty obligation to work with the Tribe to complete and execute such agreements. Similarly, it should not be optional for the Forest Service to consider Indigenous knowledge (and western knowledge sources) when analyzing project effects, and the agency has a Trust and Treaty obligation to prevent adverse effects to Treaty and Trust resources.

TRIBAL-FORSTW-PMA Following consultation, coordination and collaboration with relevant Tribes, silvicultural treatments including fire are used in all LUAs, and in both moist and dry stands, to promote ecologically and culturally appropriate species such as beargrass and huckleberry.

The addition of this language ensures that the Forest Service first engages with Tribes prior to conducting silvicultural treatments to promote ecologically and culturally appropriate species.

TRIBAL-FORSTW-PMAOBJ-XX To promote huckleberry abundance over the long- term on NFS lands within the Northwest Forest Plan area and potential habitat for huckleberry, the Forest consults with interested and relevant Tribes on annual huckleberry restoration actions at a scale meaningful to the Tribes and implements restoration actions through consultation with and/or through co- stewardship agreements if possible.

Because this plan component has a timing element, it is appropriately identified as an Objective rather than a Proposed Management Approach.

TRIBAL-TPTR-STD-01 Commercial collection of special forest products in the Northwest Forest Plan area shall not be permitted or may be limited if, after consultation with the relevant tribal governing body, the relevant tribal governing body Forest Service determines it may result in limiting tribal members' access to exercise the relevant Tribes' reserved treaty and other protected rights. This determination shall be reviewed annually in coordination with relevant and interested Tribes to ensure treaty and other protected tribal rights are adequately protected.

These alterations reflect that it is Tribal governments, not the Forest Service, who should determine whether collection of special forest products would compromise the ability of Tribes to exercise reserved Treaty and other rights. This kind of determination must be made by the Tribes themselves based on metrics relevant to Tribes, not a decision (or lack thereof) made by the agency.

TRIBAL-TPTR-STD-04 Upon a Tribe's request, strive to enter into at least one memorandum of agreement or

other instrument between each national forest unit in the Northwest Forest Plan area and each Tribe with treaty or other protected tribal rights to: guide the meaningful consultation processes identified with relevant Tribes; include Tribes as partners in the Forest's management and decision making processes; identify and make known each Tribe's particular perspectives, priorities, and interests; allow for protection and restoration of cultural resources and incorporation of Indigenous Knowledge assets to protect sacred sites and Traditional Cultural Properties; and provide for the respect of cultural practices and other important resources. Data privacy and sovereignty protocols shall be observed to the extent permitted by law.

If a Tribe requests the development of a co-stewardship agreement, MOU, or other instrument, the Forest Service has a Trust and Treaty obligation to work with the Tribe to complete and execute such agreements.

TRIBAL-WRKFOR-GOAL-01 Work with Tribes to explore available avenues such as administrative land transfers to provide workforce housing and office space for tribal natural resources, wildlife, fire, climate resilience, and cultural resources programs to bolster co-stewardship capacity.

Administrative land transfers are one potential, but infrequently utilized, avenue to provide land to Tribes for workforce housing and office space: identifying this tool in this plan component increases the likelihood that it will be utilized in the future.

TRIBAL-WRKFOR-GOAL-02 Support mentorship and leadership programs designed in consultation with interested Tribes to recruit and engage workforce professionals trained as tribal and Forest Service natural resource stewards grounded in culture and tradition to protect steward the national forests in the Northwest Forest Plan area through innovative programs, inclusive leadership, and advancing technology supported by relevant Tribes.

"Steward" is a more appropriate word that better describes a land management mission that is grounded in culture and tradition and reflects Indigenous values and worldviews.

TRIBAL-WRKFOR-GOAL-04 Collaborate with Tribes, educational programs, and community groups working with Indigenous youth in the Northwest Forest Plan area to support youth in developing robust understandings of key concepts for participation in community resilience and land stewardship, including receiving curricular and experiential learning about Indigenous and colonial histories and conditions of the land, tribal sovereignty, fire ecology, natural resource workforce development, and climate resilience. Annually coordinate with Tribes within the Northwest Forest Plan area to notify them about opportunities such as the Indian Youth Service Corps program and other opportunities.

These changes reflect an intention to specifically include Tribes in working with native and non-native youth to foster a sense of community and respectful land stewardship ethic.

TRIBAL-WRKFOR-GOAL-07GDL-XX To facilitate tribal community workforce capacity, work in meaningful engagement and consultation with relevant Tribes to identify areas of common workforce needs. Through

government to government and tribal roundtable processes, prioritize training, workforce development, and agreements for associated forest co-stewardship, construction, fire management, and wildlife and vegetation monitoring to tribally owned or operated businesses and organizations.

This plan component should be a Guideline to reflect the degree of compliance appropriate for this topic.

TRIBAL-WRKFOR-GOAL-09 In consultation with Tribes, and through cooperative agreements and funding approaches, increase tribal community workforce opportunities and capacity building in the fields of natural and cultural resources, forest stewardship, fire, cultural and natural resources and traditional cultural properties, and wildlife monitoring on national forests in the Northwest Forest Plan area, focusing on tribal youth and young adults.

Cultural and natural (or, "natural and cultural") resources are listed twice and "traditional" omitted from what should be "traditional cultural properties." This edit reflects those corrections.

B. Omitted Plan Components.

The Northwest Forest Plan Federal Advisory Committee (FAC) developed several plan components that were not incorporated into any action alternative in the DEIS. We suggest that the Forest Service include the following plan components in the final amendment.5

FAC 1-11 DC: The Forest recognizes the treaty, reserved, and other similar rights of and trust responsibilities to Tribes within the Forest and the difficult history of claiming and enforcing these rights that have led to intergenerational trauma, painful memories and events for Tribes and Tribal members that are still felt within these communities. The Forest takes seriously its role and responsibility in any healing processes that emerge from collaboration with willing Tribes.

FAC 1-30 DC: To implement the Tribal Relations Program on each Forest and to ensure that individual Tribal needs are respected and understood, each Forest employs staff with the sole responsibility of stewarding relationships between each Tribe and the Forest. The roles and responsibilities of the Tribal Relations Program Manager include Tribal outreach, staff-to-staff coordination, and collaboration, and are separate from Forest Service staff responsibilities associated with heritage and/or archaeology program tasks.

FAC 1-43 OBJ: Within two years, establish a Tribal wildlife and biodiversity regional interagency working group (Regional Tribal Operations Working Group) with Tribal and Forest Service representatives from Regions 5 and 6 to explore co-

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5 Currently, the Proposed Action does not acknowledge that Tribes are ethnically, culturally, and linguistically diverse, which could result in differences of perspective among Tribes. The Proposed Action does not directly

address how to address those differences in a way that is respectful of all relevant Tribes. It is important for all relevant Tribes to be heard in a fair and transparent decision-making process, particularly when shared resources important to Tribes are at issue. Although adding these additional components would help address this issue, particularly FAC 1-11 DC and FAC 1-30 DC, additional Leadership Commitments are needed to ensure all Tribes are treated fairly when there are differences of opinion among Tribes regarding the management of particular resources or geographies.

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stewardship of wildlife and biodiversity that is inclusive of Indigenous knowledge and cultural practices, and western science, and that honors Tribal data and knowledge sovereignty and includes free, prior, and informed consent by Tribes and Tribal people.

FAC 1-73 STD: The Forest shall establish an intertribal forest council with representatives of all relevant and interested Tribes for the purpose of coordination, consultation, training, workforce development, and land management guidance purposes.

FAC 1-78 GDL: Upon Tribal request, entities gathering data and providing dispatch information regarding fire ignitions should have the authority to enter into agreements with such Tribes to protect the privacy and confidentiality of cultural ceremonial and other fire use.

FAC 1-92 GOAL: Upon Tribal request, enter into long-term contracts, master stewardship agreements, and other sovereign-to-sovereign cooperative instruments with Tribes and Tribal entities. Establish a working group of tribal and Forest Service leadership to revise existing agreement templates such that they respect Tribal sovereignty.

FAC 1-103 MA:6 Develop and implement cost-share, grant, and other financial support mechanisms to enable relevant Tribal government and Tribal staff participation in co-stewardship efforts, consultation, collaboration, coordination, monitoring, planning, administrative support, environmental analysis, and other Forest Service activities.

FAC 1-105 MA: Forest Service Regional leadership in the NWFP Area partners with Tribes, environmental education organizations, and State Education Boards to develop or adjust academic standards, curriculum, and instructional materials to ensure public education provides students with robust understandings of climate resilience, fire ecology, and Indigenous sovereignty.

FAC 1-108 SUIT:7 All administratively-designated lands are suitable for co- stewardship by Tribes, upon Tribal request to undertake co-stewardship activities.

FAC 1-109 MONT:8 Conduct ongoing monitoring of visitor use and develop responses in coordination with relevant Tribes when needed to safeguard treaty, reserved, and other similar Tribal rights and the resources and places

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6 "Management Approach."

7 "Suitability of Lands."

8 "Monitoring."

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upon which those rights depend, and generally, to ensure the ecological compatibility of recreation with Tribal treaty rights and resources.

FAC 1-110 MONT: At Tribal request and in consultation and cooperation with relevant Tribes, conduct regular monitoring of specified culturally significant resources and First Foods. Support Tribes in selecting the relevant species, designing the monitoring plans, conducting the monitoring, and storing and sharing the data according to Tribal knowledge and data sovereignty protocols. Where the Forest proposes to monitor culturally significant resources, ensure any resulting research or data is protected in consultation with relevant Tribes.

FAC 1-111 MONT: In cooperation with relevant and interested Tribes and according to Tribal knowledge and data sovereignty protocols, conduct monitoring of implementation of the special forest products program in the Forest to ensure that Tribally-important culturally significant resources are harvested in a manner and rate consistent with sustainability.

FAC 1-112 MONT: At Tribal request, work with Tribes to co-develop monitoring thresholds or triggers and adaptive management pathways that incorporate Indigenous knowledge into management or mitigation responses while protecting Tribal data sovereignty and culturally sensitive information.

FAC 1-113 MONT: In situations where heritage monitoring is required for implementation activities, these activities should include a tribally-designated representative, not just a Forest-designated archaeological monitor.

FAC 2-12 GOAL: Establish staff positions to focus on fostering partnerships with colleges, K-12 education, Tribes, and local organizations to create and expand comprehensive natural resources and fire-related student training and learning opportunities.

FAC 2-15 GOAL/MA: To meet the pace and scale of needed wildfire resilience treatments, including thinning, prescribed fire, and cultural fire, and address the intergenerational burdens of intensifying risk, Forests should collaborate with K- 12 and higher educational institutions to develop shared strategies and programs for student awareness and involvement in pathways into wildfire resilience work. The Forests should work with high school and college programs and engage with experiential and curricular learning in elementary and middle schools.
C. Alternative D Tribal Inclusion Plan Components.

The following plan components are included in Alternative D and should be carried forward into the final plan amendment as modified below.

TRIBAL-FORSTW-ALL-GOAL-08-D: Coordinate with Tribes to promote alternate treatments for protecting rare and listed plants, integrating Indigenous Knowledge approaches with special attention to enhancing and restoring

disturbance- dependent plant species like geophytes, plants with bulbs, corms, or tubers, where standard avoidance treatments may impair plant survival. Move towards landscapes supporting traditional Tribal practices, such as large, low-intensity prescribed burns.

Although this plan component is similar to FIRE-ALL-GOAL 1 in Alternative B, the plan component above is more specific and applies to all disturbance types, and therefore better addresses Tribal needs and expectations.

TRIBAL-FORSTW-ALL-GOAL-09-D: For post- disturbance areas, Tribes should be invited to collaborate on designing post-disturbance management prescriptions and plans that integrate Indigenous Knowledge and western science to encourage restoration of woodlands and resources at gathering sites, protect or enhance conditions at ceremonial sites, and maintain or improve access to culturally important sites and resources.

This plan component addresses important issues and should be carried forward into the final amendment.

TRIBAL-FORSTW-ALL-PMA-XX-D: Work with interested and relevant Tribes to determine annual restoration actions of First Foods and culturally significant botanical species at a scale meaningful to the Tribes, within the range of the NSO. Complete those restoration actions through coordination with Tribes or through co-stewardship agreements if possible.

This plan component should be included in the final amendment: huckleberry stewardship warrants its own plan component, as do other First Foods and culturally significant species.

TRIBAL-FORSTW-ALL-OBJ-03-B: Annually implement projects that increase populations or maintain or restore habitat for dry, serpentine, and wet meadow- associated culturally significant species, such as camas or other species by 2,000 acres across the Northwest Forest Plan area.

TRIBAL-FORSTW-ALL-OBJ-03-D: Annually implement work that increase populations or maintain or restore habitat for dry, serpentine, and wet meadow- associated culturally significant species, such as camas or other species identified through tribal consultation on 10 projects across the Northwest Forest Plan area.

These two plan components could be combined in the final amendment such that there is a single

Objective that seeks to implement 10 projects covering at least 2,000 acres: the intent is to maximize these treatments.

V. Forest Stewardship Plan Components.

Below we offer strategic redline changes to the Forest Stewardship plan components in Alternative B.

FORSTW-LSR-MOI-GDL-01 In young, moist forest stands less than 120 years old in Late-Successional Reserves, forest management activities should be designed to maintain or restore late-successional and old-growth forest conditions that (a) contribute to the recovery of federally listed species such as northern spotted owl, marbled murrelet, and coastal marten; (b) maintain or restore habitat for otherspecies that depend upon younger stands; or (cb) achieve other desired conditions, such as fostering old-growth development and supporting tribal co-stewardship and cultural use.

Late-Successional Reserves (LSRs) are intended to be large blocks of interior and intact late- successional and old growth habitat for obligate species. While we recognize that all forests contain a mixture of seral stages, the 1994 Plan is clear that the LSR land use allocation should not be managed for species that depend on younger stands. This revision accurately reflects the intent of the 1994 Plan.

FORSTW-MTX-MOI-STD-01 In moist forests in Matrix, no timber harvest shall occur in old growth stands (those that established prior to 1825) except to provide for tribal co-stewardship and cultural use or to reduce wildfire risk to communities andinfrastructure. See also FIRE-ALL-DC-01 and FIRE- ALL-PMA.

Old growth trees are extremely resistant to wildfire.9 As such, there is no legitimate risk- reduction rationale to remove these trees. This proposed edit tightens this Standard to conserve old growth trees when timber harvests occur for purposes of wildfire risk reduction.

FORSTW-MTX-MOI-GDL-01 In moist forests in Matrix, timber harvest in mature forest stands (those that established between 1825 and 1905) should only occur to maintain and restore ecosystem integrity, including but not limited to: (a) reducing the risk of fire to adjacent old forest stands; (b) developing and enhancingstructurally complex, late-successional habitat including characteristics to supportfederally listed species such as northern spotted owl, marbled murrelet, andcoastal marten; (c) maintain or restore habitat for other species dependent on late-

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9 The denser canopies found in old growth forests create microclimates by casting more shade on the forest floor, lowering temperatures, and increasing humidity, creating unfavorable conditions for wildfires to start and spread (Frey et al. 2016, Barredo et al. 2023). During active fires, old-growth or mature trees show higher survivability than juvenile trees due to thicker layers of bark and larger diameter and provide crucial fire refugia for local organisms (Alexander et al. 2006, DeLong et al. 2000). Following fire events, remnant old-growth stands enhance the recovery of forest ecosystems due to increased complexity of forest canopy structure and the facilitating the recolonization of late-seral species (Seidl et al. 2014).

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successional characteristics or; (d) meeting tribal cultural use priorities. Application of this guideline should be responsive to changes in landscape forest conditions and new scientific information on the effects of silvicultural treatments on ecological benefits of timber harvests in these stands. Treatments can also occur to reduce wildfire risk to communities and infrastructure. See also FIRE-ALL- DC-01 and FIRE-ALL-PMA.

FORSTW-MTX-MOI-STD-03 In moist forests in Matrix, timber harvest in mature forest stands (those that established between 1825 and 1905) shall develop and enhance structurally complex, late-successional habitat including characteristics to support federally listed species such as northern spotted owl, marbled murrelet, and coastal marten.

This edit deletes (b) from FORSTW-MTX-MOI-GDL-01 and moves it into new Standard FORSTW-MTX-MOI-STD-03, which is intended to make obligatory the purposes for which timber harvest in moist mature stands may occur (i.e., to develop and enhance structurally complex, late-successional habitat including characteristics to support federally listed species). This provision clarifies that any timber harvest - proactive stewardship - in moist mature stands must develop and enhance old forest conditions.

FORSTW-MTX-MOI-PMA-XX Young, previously managed stands are a priority for active management, including variable density thinning and variable retention harvesting.

This revision clarifies that the priority for active management is forest stands that are young and previously managed - i.e., those with an anthropogenic disturbance history that have simplified stand structure and composition that can benefit from silvicultural intervention to increase characteristic heterogeneity, stand structure and composition, and ecological function. We consider stands that have been harvested and either replanted or left to naturally regenerate to be "previously managed." We encourage the Forest Service to add "previously managed" to the Glossary supporting the final amendment.

FORSTW-ALL-DRY-STD-01 Vegetation management and harvest shall retain all trees older than 150 years and sufficient large trees as appropriate for the forest type to restore characteristic quality, structure, abundance, distribution, pattern, and composition of old growth trees. Exceptions apply for tribal co-stewardship and cultural use, restoration of unique ecosystems, and to reduce wildfire risk to communities and infrastructure. See also FIRE-ALL-DC-01 and FIRE- ALL-PMA.

The dry forest landscape is depauperate in old growth trees,10 compelling action to recruit old trees through proactive stewardship. The addition above provides for the recruitment of old growth trees in dry forests by requiring the retention of sufficient large trees as appropriate for the forest type to supplement the retention of existing old growth trees in these forests. The edit also includes an intent statement in that the retention of large trees is intended to "restore characteristic quality, structure, abundance, distribution, pattern, and composition of old growth trees."

FORSTW-ALL-DRY-GDL-02 Dry forest restoration should conserve older trees and recruit sufficient large trees from the largest size and oldest age classes at high risk of mortality from fire, insects and disease, or drought through a variety of silvicultural and stewardship techniques including but not limited to thinning and wildland fire appropriate for restoring characteristic older dry forest conditions.

The additional language above clarifies that dry forest restoration should conserve older trees and recruit future old growth trees from the largest size and oldest age classes.

FORSTW-ALL-DRY-GDL-03 In Late-Successional Reserves in dry forests, limited fuel management salvage is permitted when beneficial to ecological goals, fire resilience, and wildlife needs, and local communities. Dry forest salvage should retain a high number of large snags as well as all live trees. Exceptions are authorized for protection of critical infrastructure and existing system roads.

Given that the purpose of LSRs is large blocks of intact old forest for the persistence of late- successional and old growth obligate species, it is inappropriate to conduct salvage operations for the benefit of "local communities," which could be read to permit salvage when economically beneficial to those communities. "The NFP states that 'salvage will not be driven by economic or timber sale program factors.' NFP Appendix F, F-21." Oregon Nat. Res. Council Fund v. Brong, 2004 WL 2554575, at *8 (D. Or. Nov. 8, 2004), aff'd, 492 F.3d 1120 (9th Cir. 2007).

VI. Fire Resilience Plan Components.

The "Background" narrative for the Fire Resilience plan components states:

In this section there is plan content specifically related to community resilience to wildland fires. The PMAs provide a process for further refining the extent of the area (community protection area) to which this plan direction applies. In situations where a more comprehensive fire risk assessment does not exist, this plan direction applies in all LUAs within 1 mile of a community.

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10 National Research Council. 2000. Environmental Issues in Pacific Northwest Forest Management. Washington, DC: The National Academies Press; Hessburg, P.F.; Smith, B.G.; Kreiter, S.D., Miller, C.A., Salter, B.R., McNicoll, C.H., Hann, W.J. 1999a. Historical and current forest and range landscapes in the interior Columbia River basin and portions of the Klamath and Great Basins. Part 1: linking vegetation patterns and landscape vulnerability to potential insect and pathogen disturbances. USDA Forest Service, Pacific Northwest Research Station, General Technical Report PNW-GTR-458. Portland, OR.

DEIS, A1-24. Plan component FIRE-ALL-OBJ-01 also references "1-mile buffer HUD."11Id. at A1-25. The1-mile and its relationship to the wildland-urban interface is unclear. We encourage the Forest Service to utilize the agency's own 2010 Wildland-Urban Interface of the Conterminous United States12 which it has recently used to develop and award Collaborative Wildfire Risk Reduction grants. If this geographic reach is related to another concept (such as the Wildfire Restoration Zone), the agency must clarify its intent in the final amendment, as well as identify the best available scientific information on which the 1-mile zone is based.

FIRE-ALL-PMA-XX Prioritize fuel projects including strategic tree and shrub removal, thinning, wildland fire and coordination with Tribes on cultural burning to promote fire-adapted landscapes and communities by:

a. Coordinating with Tribes, state agencies, and private landowners, and communities to prioritize, plan, and implement fuels treatments and accommodate tribal cultural burning to manage areas important to community fire protection goals and identified as culturally important by Tribes, while maintaining essential ecosystems services.

These revisions reflect the need to collaborate and consult with Tribes to identify areas of importance to Tribes - as identified by Tribes themselves - where fuels treatments and cultural burning can steward culturally important resources. The intent is to ensure that Tribes, and not other entities, identify areas for ecocultural restoration and are involved in the implementation of such treatments.

FIRE-ALL-PMA-XX The boundaries of the community protection areas adjacent to property, critical infrastructure, and places of tribal cultural significance have been determined through coordination with the national forest, Tribes, state agencies, private landowners, and communities through efforts such as Community Wildfire Protection Plans (CWPPs). Community protection areas are determined by evaluating conditions on the ground and incorporate the best available fire risk science such as Potential Operational Delineations (PODS), Potential Control Lines (PCLs), and Indigenous Knowledge. Collaborative, community-driven wildfire risk mitigation frameworks, or CWPPs, inform prioritization, planning, and implementation of fuels treatments in areas with overlapping social and ecological benefits. Community wildfire protection goals include protecting highly valued resources and assets, such as recreation infrastructure and supporting ecological functions at a landscape scale.

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11 We suggest the following edit to FIRE-ALL-OBJ-01 to remove the reference to this buffer:

FIRE-ALL-OBJ-01 Treat 2.65 million acres per decade employing all fuel treatments across all LUAs, including 150,000 acres per decade in the community protection areas (1-mile buffer HUD); total includes FIRE-ALL-OBJ-02-B.

12 Martinuzzi, Sebasti[iacute]n; Stewart, Susan I.; Helmers, David P.; Mockrin, Miranda H.; Hammer, Roger B.; Radeloff, Volker C. 2015. The 2010 wildland-urban interface of the conterminous United States. Research Map NRS-8.

Newtown Square, PA: U.S. Department of Agriculture, Forest Service, Northern Research Station. 124 p.

As stated supra, it is not clear whether "community protection areas" are commonly known as the "wildland-urban interface" or WUI. If so, we encourage the Forest Service to specifically reference the 2010 Wildland-Urban Interface of the Conterminous United States in this plan component: this research map has already mapped the WUI across the country and represents the best available science, and as such is preferable to allowing communities to designate community protection areas that are inconsistent with those identified on this map.

In the alternative to the use of the 2010 research map, the Forest Service should revise these plan components consistent with our comments in Section VIII, infra.

FIRE-ALL-DC-01 In areas where wildfire risks affect communities, tribal values, and infrastructure, within Late-

Successional Reserves, Matrix, Adaptive Management Areas, and Riparian Reserves, fuel conditions and stand characteristics result in reduced risk to highly valued resources, safer communities and effective wildland fire operations. Wildland fuel conditions facilitate effective suppression wildland fire management by local resources under most weather conditions to mitigate the significant risk of potential economic loss and public safety posed by a wildfire occurring within this area.

We strongly believe that the Forest Service must make a paradigm shift away from a full wildland fire suppression policy and towards more strategic management of fire for resource benefit, social-ecological resilience, and fire-adapted communities and forests. This suggested edit effectuates that necessary shift.
VII. Climate, Ecosystem Integrity, and Carbon Plan Components.
We appreciate and support the inclusion of climate, ecosystem integrity, and carbon plan components in the proposed action. However, we believe additional plan components are warranted as we discuss infra.

CLIMATE-DC-05 The transportation network is resilient to the effects of climate change, including the ability to accommodate increased erosion, runoff and peak flows that may exceed historic streamflow events. Roads and trails are located in low-risk areas and do not impair fish and wildlife habitat connectivity or climate- induced movement. Culverts and stream crossings are appropriately sized to accommodate expected peak flows.

CLIMATE-DC-XX During climate-enhanced storm events, roads are not a risk to aquatic resources.

CLIMATE-DC-XX Roads do not disrupt hydrologic or aquatic habitat function.

These suggested additions focus on Desired Conditions related to the road network, which is often the most significant cause of aquatic degradation. The insertion into CLIMATE-DC-05 sets a Desired Condition that roads do not impair fish and wildlife habitat connectivity or movement in response to climate change, which are objectives of the Forest Service's 2012 Planning Rule. 36 C.F.R. [sect][sect] 219.8(a)(1), (a)(3)(i), 219.9(a)(1), 219.10(a)(1). The intent of the two new Desired Conditions is that roads do not impair ecological integrity of aquatic systems.

CLIMATE-OBJ-XX Within 15 years, reduce road-hydrologic connections and sediment delivery from roads by 50% across all management areas through hydrologic decommissioning and other treatments.

CLIMATE-OBJ-XX Within 15 years, attain a minimum road system needed for safe efficient travel. The minimum road system is the network of roads that can be well maintained with a budget equal to the average road maintenance budget over the previous five years.

CLIMATE-OBJ-XX Within 15 years, road density within Late-Successional Reserves and Key Watersheds will not exceed 1 mile of road per square mile area within each subwatershed.

CLIMATE-OBJ-XX Within 15 years, road density within Matrix and Adaptive Management Areas will not exceed 2 miles of road per square mile area within each subwatershed.

Alternative B has no Objectives associated with the Climate, Ecosystem Integrity, and Carbon plan components, without which there is no sense of urgency with which we must proactively steward forests and watersheds in the face of a changing climate. Given that the road network on national forestlands contributes to sedimentation, habitat fragmentation, and other deleterious effects,13 the final amendment must include Objectives that drive restoration and remediation of roaded areas.

CLIMATE-GDL-03 In Late-Successional Reserves and Key Watersheds, reduce road mileage through full road decommissioning.

CLIMATE-GDL-04 Reduce road mileage and hydrologically disconnect roads from water resources across all land allocations. Treatment priority shall be given to roads that pose the greatest ecological risk to climate-enhanced storms and fish and wildlife habitat connectivity.

CLIMATE-GDL-05 Within Matrix and Adaptive Management Areas, reduce road mileage through full road decommissioning, hydrological stabilization, and other treatments.

These additional Guidelines are intended to prioritize proactive stewardship of the road network

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13See generally, United States Forest Service, Forest Service Roadless Area Conservation, Final Environmental Impact Statement, Chapter 3 (2001).

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to contribute to climate resilience and mitigation.

VIII. Alternative D.

We support the inclusion of the following aspects of Alternative D in the final amendment.

A. Wildfire Resistance and Resilience.

We support the aspects of Alternative D that include an innovative zoning approach to setting fire management priorities that draws from the revised Sierra, Sequoia, and Inyo National Forests forest plans. Alternative D divides the landscape into four strategic fire management zones reflecting progressively decreasing risk to communities. The Community WildfireProtection Zone (CWPZ) exists closest to communities in the "wildland-urban interface," where risks are high and vegetation mitigation and fire suppression are the highest priorities.

The General Wildfire Protection Zone (GWPZ) is designated outside the CWPZ where natural resource or community values may be at risk due to high fuel loads. Beyond the GWPZ lies the Wildfire Restoration Zone (WRZ), where wildfires pose less of a threat to communities and where fire may potentially benefit natural resources. Here, ecological restoration may be needed before wildland fire can be relied on to maintain ecological integrity. The Wildfire MaintenanceZone (WMZ) occupies the most remote parts of the landscape, where wildfire poses a low threat to communities and the ecosystem will benefit from wildland fire under a wide range of weather and other conditions.

Such a strategy, in which objectives and fire response are identified within discrete zones in advance of an incident, is a sound approach to wildfire management (North et al. 2015, 2024). With some strategic modifications discussed here, we believe it could and should be incorporated into Alternative B and carried forward into the final amendment.

We generally concur with the support for fire's role in ecosystems expressed in the Desired Conditions, Goals, Standards, Guidelines, and Potential Management Approaches proposed for all zones, though the classification of elements as Desired Conditions, Goals, etc. strike us as somewhat arbitrary. We suggest more attention to the grammatical construction of these elements to ensure they are appropriate to each type of plan component. We note that the only Standard applies only to Wilderness, Research Natural Areas, and National Scenic Trails, which seems excessively narrow: this Standard should apply to all land designations, not just a few selected administrative and congressional designations. We also note that the permissive construction of the sub elements of this Standard (e.g., "[hellip]unless more direct attack is needed," "When possible[hellip]") renders it virtually meaningless and unenforceable, which is inconsistent with the definitions of these plan component types.

We agree that the purpose of establishing Strategic Fire Management Zones (SFMZs) is to allow conditions to be assessed, plans made, and projects implemented to address those conditions before an incident, and observe that mapped zones also provide incident managers with a clear sense of the objectives within each zone that should guide incident responses. We agree that it is appropriate to adjust zone boundaries as conditions on the ground change, but we submit that fire hazard mitigation and ecological restoration treatments designed to produce those changed conditions are most likely to be carried out at scales smaller than SFMZs. We propose that SFMZs be aggregated from operational units, such as Potential Operational Delineations (PODs), that allow appropriately scaled projects to be developed and implemented through a process that involves collaborative planning among all relevant agencies, landowners, and stakeholders.

We support the establishment of a Community Wildfire Protection Zone where conditions present an immediate threat to adjacent communities and treating those areas to minimize potential loss of community assets. We agree that the goal here is not to stop a fire but to reduce the likelihood that radiant heat emanating from wildland fuels conveys fire to the built environment. Treating fuels to achieve this objective may result in conditions outside the natural range of variation for that vegetation type, but such conditions need extend no more than one hundred meters from structures to achieve this effect, an area that others have called the "Home Ignition Zone." The current proposal sets the CWPZ as equivalent to the wildland-urban interface (WUI), an area described in the glossary as "The line, area, or zone where structures and other human development meet or intermingle with undeveloped wildland or vegetation fuels." While this definition may technically fit the terms of the Home Ignition

Zone, the WUI is more often interpreted as a zone 0.5-1.5 miles beyond the community, an excessively large area that will make achievement of desired fuel conditions nearly impossible. We therefore suggest that the CWPZ be defined consistent with the dimensions of the Home Ignition Zone, and that the Forest Service change the name of the "Community Wildfire Protection Zone" to the "Home Ignition Zone" to better describe the actual extent of this area.

Last, while we agree that in some cases, even the CWPZ may benefit from the occurrence of fire, chances are overwhelming that any unplanned fire that starts there will be suppressed. Therefore, we support establishing suppression as the appropriate management response in the CWPZ.

The General Wildfire Protection Zone is designated "where conditions currently put some natural resource and/or community values at high risk of damage from wildfire." DEIS, A2-23. This area generally occurs near communities but beyond where conditions have a direct effect on home ignition. Suppression is likely to be the appropriate management response to unplanned fire. Here, the focus of management should be on changing the forest conditions that threaten natural resources and communities if fire behavior should exceed suppression capacity. In dry forests, this will generally entail thinning followed by application of prescribed fire to reduce flame lengths in the event of fire. In moist forests, fuel reduction may also require placement of strategic fuel breaks that deviate from natural conditions. The width of the GWPZ should generally not need to extend beyond approximately 1000 meters from communities (North et al. 2024), though adjustment to fit natural features is appropriate. It is the combination of the Community Wildfire Protection Zone and the General Wildfire Protection Zone that should be considered the Wildland-Urban Interface.

The Wildfire Restoration Zone (WRZ) exists beyond where wildfires present a high risk to communities and where wildfire may benefit natural resources but "where some ecological restoration may be needed before using wildland fire" under a wide range of conditions. DEIS, A2-24. We support this characterization of the WRZ and the appropriateness of the plan components associated with it in Alternative D. Here, the objective should be to achieve conditions under which wildfire will benefit natural resources through ecological restoration. The appropriate management response to unplanned fire will generally be suppression but may be expanded to include managed wildfire under predetermined conditions.

B. Survey and Manage.

First, the Forest Service should be diligently evaluating Survey and Manage species as candidates for Species of Conservation Concern (SCCs) outside of the forest plan amendment process. The Survey and Manage program was added to the 1994 Plan as a mitigation measure to protect rare and unique species threatened by continued logging of late-successional and old growth forests. Survey and manage species drive critical ecological processes that are essential to ecosystem function. Given that the NFP amendment will conserve late-successional and old growth forests in the Matrix and all other land use allocations - a coarse filter - it is not clear that the Survey and Manage program - a fine filter - remains necessary. We anticipate that the viability of Survey and Manage species will be met through the coarse filter plan components contained in Alternative B; but any proposed changes to the Survey and Manage program must be accompanied by analysis showing populations of wildlife associated with older forests are no longer threatened and will be sustained.

C. Fire Resilience Treatment and Maintenance Objectives.

We support FIRE-ALL-OBJ-02D over FIRE-ALL-OBJ-02B because the former would treat more acres (2.75 million acres vs. 1.75 million acres) per decade with wildland fire (prescribed, unplanned ignitions, cultural) to meet resource objectives. Given the significant fire deficit on NWP landscapes, and the urgent need to mitigate and adapt to climate change, we believe restoring fire to the landscape is appropriate and desirable and will reduce risk of uncharacteristic fire activity to communities and natural resources.

We support FIRE-ALL-GDL-05D to use wildland fire to meet multiple resource objectives including congressionally reserved lands for the same reasons as above.

We would also suggest the inclusion of an Objective in the final amendment that seeks to accomplish an appropriate level of maintenance treatments in dry forest areas that have been restored. We recognize that forest restoration and proactive stewardship are often not a one-time event, and that ongoing maintenance treatments - particularly in dry forests - may be required.

IX. Conclusion.

Thank you for the opportunity to provide comments on the proposed amendment to the Northwest Forest Plan. The Forest Service is to be commended on the collaborative spirit in which the agency worked with the FAC, Tribes, and others to develop the draft EIS and alternatives. We urge the agency to continue forward with the amendment as outlined in our Alternative B+ comments. As President Clinton stated in 1993 at the Forest Summit that would lead to the development of the 1994 Plan,

We're here to begin a process that will ensure that you will be able to work together in your communities for the good of your businesses, your jobs, and your natural environment. The process we [have begun] will not be easy. Its outcome cannot possibly make everyone happy. Perhaps it won't make anyone completely happy. But the worst thing we can do is nothing.

President Clinton's words remain as prescient today as they were 30 years ago. Recognizing that many stakeholders will not be content with changes to the status quo, we believe that doing nothing would not be the best path to better stewardship of the national forests within the range of the northern spotted owl.

Sincerely,

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Silvix Resources Portland, OR.

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Cascade Forest Conservancy Vancouver, WA

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Conservation Northwest Twisp, WA.

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Klamath-Siskiyou Wildlands Center Ashland, OR

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CalWild Oakland, CA.

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The Wilderness Society Seattle, WA.

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Methow Valley Citizens Council Twisp, WA.

[]

National Parks Conservation Association Seattle, WA.

ATTACHMENT-LETTER TEXT: NFP Amendment Comments - FINAL.pdf; This is the same content that is coded in text box; it was also included as an attachment