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Comments: March 17, 2025

RE: Comments on Draft Northwest Forest Plan Amendment Comments on Proposed NWFP amendment

R6 - Pacific Northwest Region All Units 333 SW 1st Avenue PO Box 3623 Portland, OR, 97208-3623

To Whom It May Concern:

The Forest Resources Association (FRA) appreciates the opportunity to comment on the Draft Environmental Impact Statement (DEIS) for the Amendment to the Northwest Forest Plan. Our comments are below.

FRA represents the interests of over 300 organizations and businesses in the forest products industry. Our members include forest landowners, suppliers, consuming mills, associated businesses, and state forestry associations. FRA promotes the interests of its members in the economic, efficient, and sustainable use of forest resources to meet the needs of the wood fiber supply chain through private enterprise. FRA members are represented in 49 states and 384 congressional districts

FRA has multiple members that rely on timber supplied from forests managed by the US Forest Service (USFS) and Bureau of Land Management (BLM). Our members are strong advocates for the active, science-based management of our national forests, which yields multiple benefits, including the support of rural, forest-based economies through timber harvest.

FRA is committed to assisting the Forest Service in updating the current Northwest Forest Plan (NWFP) to reduce wildfire impacts and increase forest health through active forest and timber management. FRA staff participated in the Northwest Forest Plan Federal Advisory Committee (NWFP FAC) and supported more than 180 recommendations for amending the NWFP. These recommendations are thoughtful and address some of the issues associated with the current NWFP. However, the proposed amendment fails to address many important issues. If the Forest Service does not resolve these issues, they will not be able to implement this proposed amendment.

Survey and Manage

None of the action alternatives outlined in the DEIS fully address the Survey and Manage requirements outlined in the NWFP. Survey and Manage severely inhibits the ability of the USFS units to implement active management, especially within designated Matrix lands fully. Specifically, the amendment does not remove or alter the "Pechman" exemptions, which allow the management of stands up to 80 years old without completing

Survey and Manage requirements. While some of the alternatives would permit the management of moist stands up to 120 years old in the Late-Successional Reserves (LSR) and moist stands established after 1905 in the Matrix, it fails to remove the requirement to complete Survey and Manage in these stands. Survey and Manage requires substantial time to survey the area for multiple rare and little-known species that are thought to be associated with late-successional and old-growth forests. As a result, the USFS's ability to implement active management on these lands remains severely diminished, and it will not increase active management in areas that desperately need it. It is unclear why Alternative D is able to suspend Survey and Manage requirements for a small portion of the landscape. Please explain why this exemption is not available for all stands in the Matrix and LSRs older than 80 years and younger than 120 years old (or established after 1905).

FRA recommends that the Forest Service remove the Survey and Manage requirements and transition to a Species of Conservation Concern (SCC) program within the 2012 planning rule to modernize the NWFP and habitat management. Moving towards this program instead of maintaining the outdated Survey and Manage program will better align the NWFP and underlying forest plans to meet the needs of the forests, wildlife, and economic outputs. FRA suggests that the agency start by modifying the survey requirements for the Red Tree Vole. At a minimum, the Forest Service should expand the exemption for community protection areas in Alternative D to all dry forest lands and moist Matrix lands in the NWFP.

#### Land Use Allocations (LUAs)

The amendment to the NWFP did not allow for changing land use boundaries. The current boundaries designated under the NWFP have put multiple communities and ecosystems at risk due to the inability of the land managers to treat/restore landscapes. Forests are dynamic and forever changing across the landscape; the failure to amend the plan to remove these artificial barriers inhibits the Forest Service's ability to meet the landscape's needs to reduce fire impacts, increase resiliency, and boost economic growth in rural areas. The amendment should review the current land use boundaries and work on adjusting them to truly meet the needs of the rural population, reduce the impacts of wildfire, and increase habitat for forest-dependent species.

FRA supports managing Adaptive Management Areas (AMAs) in a manner similar to the Matrix designation. Originally, these areas were intended for adaptive management through learning; however, due to the complexity of management requirements in the initial NWFP, these areas have remained unmanaged for 30 years. It is crucial to adopt a new management strategy to ensure the health of our forests, economic sustainability, development, and the fulfillment of social needs.

As evidenced by the destructive wildfires over the past 10 years in Oregon, Washington, and California, proactively managing forests around communities will help to reduce wildfire impacts, save lives, and reduce the threat of property damage. These communities are directly affected by the Forest Service's policies and allowing them to manage areas that threaten their property will save lives and reduce the detrimental impacts of wildfire on our national forests.

#### Forest Stewardship - Overall

Since 1994, the NWFP plan has significantly impacted the management of the landscapes within the NWFP area. As highlighted in the NWFP 20-year Monitoring Report, timber offerings from the NWFP experienced significant fluctuations between 1995 and 2000. Furthermore, the agency has never met the plan's prescribed sale quantity (PSQ). This shortfall has contributed to a nearly 40% decline in timber-related employment between 2001 and 2012, with jobs in the sector dropping from 100,000 to 65,000. These changes have had significant effects on regional infrastructure and have been a key factor in the closure of many wood processing facilities in rural communities.

[See pdf for figure]

FRA is concerned about how the Forest Service categorizes forests into moist and dry. Many stands exist on a spectrum between these two classifications, and FRA does not understand how the Forest Service will manage these stands since they do not fit directly in either the dry or moist category. The DEIS outlined plan components that leave the determination of dry vs. moist to each forest. This approach creates inconsistency in the implementation of the NWFP across the region. It will likely result in different outcomes across the region, which leads to confusion for partners and local communities that work across multiple forests.

The proposed NWFP components that pertain to all forests lack clear direction for engaging with affected communities, specifically local community leaders and representatives, in determining and planning future forest projects. These leaders have a deep knowledge of their communities, and many have often developed management plans for their lands within their respective counties. The Forest Service must acknowledge local communities when developing forest plans and management practices.

FRA strongly recommends adding a goal to highlight the economic benefits of forest management. This goal should emphasize the importance of factoring in both financial costs and benefits during planning to maximize outputs on Matrix landscapes. Additionally, the plan should explicitly address how active management supports community stability and creates future employment opportunities for rural areas.

#### Forest Stewardship - Moist Matrix

FRA advocates for sustainable timber management within the Matrix, emphasizing the importance of timber production, which remains a key focus on these lands. FRA is concerned about the potential additional restrictions in moist Matrix areas due to limitations on managing mature and old-growth stands. Ultimately, these policies will lead to a reduction in the suitable land base available for timber production. As outlined in Table 3-4 (volume 1, page 3-28), the proposed alternatives significantly reduce the area available for timber production by over 1.1 million acres in moist Matrix lands, decreasing from 2,331,000 to 1,018,000 acres according to table 3-4. This reduction encompasses old-growth stands (established before 1825) and mature stands (established between 1825 and 1905). Old growth accounts for approximately 515,000 non-reserved acres within the Adaptive Management Areas (AMAs) and Matrix, while mature growth covers nearly 798,000 non-reserved acres. The removal of these stands from the suitable land base reduces the amount of non-reserved stands available for timber production in moist Matrix and AMAs by approximately 57%. The major reduction in acres available for harvest in moist forests will negatively impact industry partners that the Forest Service needs to

manage this acreage.

FRA supports the ongoing management of forest stands established after 1905 but raises concern about the provision (FORSTW-MTX-MOI-GDL) to protect all trees within that stand that were established before 1905. The Forest Service should address a key question: How will mature trees be identified in stands developed after 1905? FRA recommends that the Forest Service carefully review these provisions and provide some flexibility in the proposed amendment to address older trees in stands that developed after 1905. For example, a stand that developed after 1905 may have trees that developed before 1905; however, these trees do not have morphological characteristics that indicate that they are older, which creates a risk for land managers. How will the USFS discern which trees were established before 1905 and which trees were established in 1901 without having to core every tree to determine their age?

The additional NWFP components categorize stands established after 1905 as young stands, but this term is misleading and likely to confuse the public and agency personnel. The public may assume that the Forest Service will only manage stands currently classified as "young" stands (less than 120 years). However, as these stands age, they will transition into "mature" or even "old" if not managed within a specific time frame. The USFS must explicitly state that these "young" stands (established in 1905 or later) will be managed in perpetuity, regardless of stand age at the time of management. For instance, a stand established in 1905 will be 140 years old in 2045; at this point, it would be considered "mature." The USFS needs to clearly state that such stands will still qualify for management, irrespective of their age classification.

#### Forest Stewardship - Dry

The DEIS outlines distinct approaches to the management of dry forests versus moist forests; however, there is some ambiguity regarding Table 3-6, which details the acres of dry forests within the Matrix and AMAs that exceed specific thresholds. The proposed plan components address dry forests on a tree-by-tree basis rather than a stand-level basis. The DEIS should clarify in the descriptions and analysis whether they are managing individual trees or on a stand-level in dry forests because it is difficult to understand the USFS approach to dry forest management outlined in the DEIS.

Alternative B prohibits harvesting trees over 150 years old, while Alternative D sets the threshold at 175 years old. How does the Forest Service determine the age of the tree without having to harvest the trees or core every tree they suspect of being over 150 years old but less than 175?

#### Salvage

FRA acknowledges and supports the Forest Service addressing salvage operations in the matrix lands. Prompt rehabilitation of these areas is vital to restore essential habitats, enhance ecosystem services, and stabilize landscapes against future disturbances, particularly within the Matrix. However, there is concern regarding the requirement to retain all green trees and large dead trees under salvage conditions. The overly prescriptive nature of this provision fails to account for critical factors such as the topography of the landscape, the species composition, and the specific habitat rehabilitation needs. This rigid approach risks impeding the Forest Service's ability to effectively salvage areas requiring rehabilitation, potentially leading to undesirable site conversion, such as the transformation of forests into shrub-dominated landscapes. A more flexible framework that considers these variables would better support sustainable and efficient restoration efforts.

### Carbon Storage

If the Forest Service intends to increase long term carbon storage in the NWFP area, they must prioritize forest management. With most of the NWFP area placed in reserve status (LSR, inventoried roadless, old/mature stands), the Forest Service has a limited amount of acreage that can effectively be managed to increase carbon storage. There is a correlation between the increased emissions and the lack of forest infrastructure to help manage the region. Since 1986, the mortality on Forest Service timberlands has increased by 223 percent, net growth has declined 55 percent, and timber harvest has declined by 80 percent (fig. 1). The lack of timber management on Forest Service lands has resulted in significant adverse economic impacts on rural economies, increased wildfire severity, converted Forest Service lands from net carbon sinks to net sources of CO<sub>2</sub>, and loss of old growth throughout the system. These numbers pertain to the National Forest System as a whole, however, in 2024, Oregon lost seven wood product facilities largely due to lack of timber supply, a result of reduced timber harvest from the National Forests. FRA requests that the USFS analyze including all mature stands in the moist Matrix for timber production.

[See PDF for figure]

Figure 1. Annual harvest, net timber growth, and tree mortality on all National Forest System timberlands from 1962-2016. Beginning in 1986, Forest Service policies resulted in a decrease in timber harvest that led to significant increases in forest mortality<sup>1</sup>. The lack of management on these lands has contributed to the severity of wildfires.

### Forest Service Capacity

FRA expresses significant concern regarding implementing this amendment and the Forest Service's capacity to achieve its objectives and goals. The NWFP adds an additional layer to existing forest plans, which complicates the National Environmental Policy Act (NEPA) analysis and consultation processes for the forests covered by this plan.

Recently, the federal government significantly reduced on-the-ground personnel essential for project analysis and implementation, further complicating regulatory consultation and project execution. FRA believes the amendment fails to adequately address current barriers, raising concerns that, without solutions, the Forest Service's limited capacity will hinder the ability of the USFS to meet the goals outlined in this revision.

The Forest Service proposed this amendment to address the evolving needs of forests and surrounding communities. While the proposal is a step in the right direction, its truncated development timeline did not allow for a thorough revision that fully meets those

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<sup>1</sup> The Plant a Trillion Trees Campaign to Reduce Global Warming[mdash]Fleshing Out the Concept. Bruce Lippke, et.al.Journal of Sustainable Forestry, wo21, Vol 40, NO. 1, 1-31.

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needs. Additionally, it fails to address key barriers, such as Survey and Manage requirements and land use designations, while also reducing lands available for active management.

#### Immediate Expansion of U.S. Timber Production Executive Order

Recently, President Trump signed an Executive Order titled "Immediate Expansion of U.S. Timber Production." In this order, President Trump directs the Secretaries of Interior and Agriculture to "[hellip]issue new or updated guidance regarding tools to facilitate increased timber production and sound forest management, reduce time to deliver timber, and decrease timber supply uncertainty." The order instructs the Secretaries to present plans to increase timber supply, streamline permitting, and work through Endangered Species Act consultation to facilitate timber production on national forest lands. FRA is concerned that the proposed amendment to the NWFP will affect the Forest Service's ability to comply with the Executive Order issued by President Trump. Please explain how the USFS intends to comply with this Executive Order and meet the goals outlined in the proposed amendment to the NWFP.

#### Conclusion

We appreciate the opportunity to provide comments on the proposed amendment to the Northwest Forest Plan. The proposed amendment makes significant strides in addressing the needs of the forests and communities affected by these landscapes. FRA is thankful to staff that participated in the NWFP Federal Advisory Committee and worked closely with Forest Service employees and representatives of the agency to provide recommendations to improve the NWFP. However, the proposed amendment fails to address several existing plan components in the NWFP that would hinder the Forest Service's ability to achieve both current and proposed objectives, as well as the desired future conditions outlined in the amendment.

Sincerely,

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FRA Western Region Manager

ATTACHMENT-LETTER TEXT: Forest Resources Association NWFP DEIS Comments.pdf; this is the same content that is coded in text box; it was originally included as an attachment