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Response to the USDA Forest Service[rsquo]s Draft Environmental Impact Statement for Northwest Forest Plan Amendments

Submitted March 17, 2025

The Native Plant Society of Oregon (NPSO) is a 501(c)(3) non-governmental non-profit organization dedicated to the enjoyment, conservation, and study of Oregon's native plants and habitats. NPSO was established in 1961, has 11 chapters around the state, and over 1000 members.

As longtime advocates for preservation of native plant species, native plant communities and habitats, and ecological processes in Late Successional/Old Growth forest, NPSO supported creation of the 1994 Northwest Forest Plan. NPSO welcomes this opportunity to comment on the first comprehensive amendment of the 1994 Northwest Forest Plan (NWFP).

The Amendment of the NWFP is long overdue. In the thirty plus years between the 1994 Plan and the initiation of this Amendment, conditions in the forests of the NW have made wildfires larger, more frequent and more destructive. Changed conditions include a more densely populated urban/forest interface; massive fuel loads due to the Forest Service[rsquo]s policy of fire suppression; increased awareness of the vital role forests play in biodiversity, clean water, clean air and terrestrial health in general and in global warming. All of these changes are the result of human activity.

RECOMMENDATIONS AND COMMENTS

In general, NPSO is supportive of the proposed amendments, which will improve forest management throughout the region. We have several specific recommendations and comments, which follow.

Section 1.2.2 Need

[ldquo]STRENGTHENING THE CAPACITY OF NWFP ECOSYSTEMS TO ADAPT TO THE ONGOING EFFECTS OF CLIMATE CHANGE[rdquo] (p. 1-5).

NPSO believes that climate change is the most powerful force affecting forests now and that its impacts will continue to dominate the health of all forests that are managed by the Forest Service for the foreseeable future. The Draft Environmental Impact Statement (DEIS) states that [ldquo]Climate change is not considered in our forest plans[hellip][rdquo]. NPSO strongly recommends that the Final EIS (FEIS) fully considers and includes the drivers and impacts of climate change on managed forests, otherwise the Forest Service cannot credibly evaluate in advance the consequences of its proposed actions. The link between atmospheric carbon, increased global temperature, and increased severity in forest fires is firmly established.

The DEIS new plan direction for dry forests in all action alternatives, in all LUAs, has exceptions for the restoration of unique ecosystems. NPSO supports this exception.

Section 1.3.1.1. Species of Conservation Concern (SCC)

The DEIS states: [ldquo]The proposed plan amendment is designed to increase ecological integrity and better adapt to the effects of climate change[hellip]which will benefit species diversity and resilience[rdquo] (p. 1-7). The DEIS admits that [ldquo]individuals or populations of some species may be adversely affected in the short term by individual project implementation[rdquo], then goes on to say that a substantial [ldquo]adverse impact to a species or population[rdquo] is not anticipated and that [ldquo]no further consideration of SCC is warranted[rdquo]. NPSO requests that the FEIS include a clear statement that individuals may be but no populations of SCC will be adversely affected by proposed project activities because potential adverse effects will be mitigated at the project level.

Section 1.10 Other Resources Considered and Dismissed

The DEIS provides overly broad reasons to consider certain issues out of the scope of the DEIS analysis. Such broad exceptions allow the Forest Service to sideline

* General opinions or position statements not specific to the proposed action
* Items addressed by other laws, regulations, or policies
* Proposed alternatives that do not meet the purpose and the need of the effort
* Items not relevant to the potential effects of the proposed action[hellip]etc.[rdquo]

The first reason, [ldquo]not specific to the proposed action[rdquo] includes general conditions like climate change that apply to all proposed actions ; the second reason, [ldquo]items addressed by other laws etc.[rdquo] like spotted owl habitat protection, certainly a relevant factor; the third reason is not germane: it refers to an alternative, not an issue; and finally, [ldquo]items not relevant to the potential effects[rdquo] is misplaced because no effect is independent of climate change, and it follows that all items are relevant to the potential effects. The FEIS should be more inclusive.

Section 3.6.1.2 Forest Carbon and Sequestration

With the increased attention given to wildfires, it is surprising that the Forest Service[rsquo]s estimates of carbon stocks in our national forests do not include carbon losses from large fires in recent years. NPSO urges the Forest Service to provide and analyze accurate data in the FEIS. NPSO agrees with the DEIS (p. 3-88) that there is a need for management to reduce risk of fire-induced carbon loss in all forests.

NPSO notes that 56% of live-tree above-ground carbon was either lost or transferred to snags in the 2020 Labor Day Fires, and that future fire activity is likely to increase. (p. 3-89). The link between atmospheric carbon, increased global temperature, and increased severity in forest fires is firmly established. Equally well established is that forest trees and forest soil accumulate atmospheric carbon and will continue to do so as long as the trees are standing. NPSO recommends that the FEIS acknowledge this carbon cycle and increase focus on maintaining standing trees as carbon reserves.

Section 3.6.2 Effects of alternatives on climate change adaptation

NPSO supports the management strategy of increasing climate change and wildlife forest resiliency through thinning and prescribed fire.

On the other hand, NPSO disagrees that the removal of standing carbon stocks will have the net effect of decreasing emissions by decreasing competition among trees for resources and thus increasing new growth and carbon storage.

NPSO encourages the drafters of the FEIS to reconsider the necessity of tradeoffs that result in the degradation of biological species habitats and prepare an approach that applies a strategy reducing ground-disturbing activities that contribute to the degradation of native plants[rsquo] biological habitats and ecosystems.

Section 3.5.2.2. Special Status Wildlife and Plants

Threatened and Endangered Species (p. 3-74)

[ldquo]Proposed changes related to timber harvest and thinning and other forest management activities in moist forest stands within LSRs [hellip] would result in short-term adverse impacts [hellip][rdquo] (p. 3-76). The argument here is that proposed changes in forest management would offset these short-term effects. However, no evidence of how this would happen is provided. NPSO requests further details on how the alternatives would provide net benefits for these species.

Survey and Manage (p. 3-81)

NPSO supports retention of the survey and manage requirements as written in the 1994 NWFP as these protect old-growth associated native botanical and fungal species (Table B10-13). NPSO trusts that these surveys will continue to be conducted on stands >80 years of age under all action Alternatives, although this is not expressly stated anywhere in the document.

Appendix D. Current Northwest Forest Plan Survey and Manage Species displays the December 2003 Survey and Manage Species list. NPSO is aware that the Forest Service still calls it the [ldquo]current[rdquo] Survey and Manage Species list, more than two decades later. As a consequence, the Survey and Manage List is outdated. There is reliable, updated information generated since 2003 by the Forest Service and cooperators about individual species, which indicates there are:

1. Species on the list which no longer qualify for S&M status;

2. Species on the list which merit an S&M category change or geographic restriction; and

3. Species which merit inclusion on the S&M list but have never been added.

NPSO recommends that the FEIS include up-to-date species data and the activity required to get this data; namely, by conducting this long overdue [ldquo]Species Review Process[rdquo].

Forest Stewardship

Overall, NPSO is supportive of management of forested stands based on the species and disturbance histories of the sites. However, we do not have a preferred overall action alternative.

Moist Forest: We prefer a modified Alternative B for moist forest management. We do not support harvest in LSRs in stands greater than 80 years of age. We find no biological reason to raise the age of harvest in these stands to 120 years and feel that this may, in fact, be detrimental to the recovery of stands by increasing the opportunity for invasive species to invade and reducing interior habitat old growth botanical species require. Nor do we support salvage in moist LSRs, with the exception of roadsides or infrastructure. For Matrix Moist forest, NPSO supports treating 5% of young stands (32K [ndash] 41K acres/decade) using ecological forestry methods while conserving and retaining older trees and no timber harvest in OG stands established before 1825.

Dry Forest: We prefer a modified Alternative C for dry forest management and support management in anticipation of further landscape change to create a sustainable range of seral stages reflective of the severity of those landscapes. NPSO supports maintaining an optimal level of dense closed canopy for dry LSRs and OG stands at landscape level. For dry LSRs, NPSO does not support salvage with the exception of roadsides or infrastructure, and recommends the FEIS disallows salvage of trees except in these circumstances. Some of the critical components for LSRs are snags and down wood - both critical for wildlife habitat and water retention for refugia for old-growth associated species (fungi) and a reservoir of water for wildlife species habitat and understory plant recovery.

03 In Late-Successional Reserves in dry forests, limited fuel management salvage is permitted when beneficial to ecological goals, fire resilience, wildlife needs, and local communities. p. A1-23

For dry LSRs, NPSO supports management in anticipation of further change to create a sustainable range of seral stages reflective of the severity of those landscapes

NPSO supports the exception for restoration of unique ecosystems in the DEIS[rsquo] proposed new plan direction for dry forest in all action alternatives, in all LUAs (FORSTW-ALL-DRY-STD-01). (DEIS Table 2-1 page 2-18). In addition to our request to accommodate the needs of rare or locally unique non-LSOG species and habitats as part of the purpose and need, and/or as an analyzed issue in the FEIS, we recommend that this exception be:

1. Part of new plan direction for moist forest as well as dry forest; and

2. That the criteria to allow it, and procedural steps to do it, be described in the FEIS.

For all LUAs. Dry Forests. NPSO supports 104K-127K acres/decade ecological forestry methods.

Tribal Inclusion

NPSO supports language in the DEIS that pertains to increasing access to culturally used native plants by indigenous Tribes. We support ensuring the sustainable harvest of cultural plants in the Proposed Action:

Culturally significant plants used by Tribes who traditionally use the Forest are thriving and are protected from

overharvest from both commercial and non-commercial uses.[rdquo] p. A1-6

NPSO supports restoration and maintenance of meadow habitats where cultural plants are located, as well as any other meadow or wetland habitats on Forest Service lands.

Fire Resilience

Post-fire habitats are perfect beds for weed growth, and equipment used in post-fire activities, such as salvage, can move weed seed around. NPSO supports treating noxious weeds post-fire as weeds often outcompete native flora.

Following large fire events, develop and implement mitigation strategies for invasive plant species.[rdquo] p. A1-27

Climate, Ecosystem Integrity, and Carbon

1.NPSO cannot overstate the importance of climate change as a stressor in the future of forests and strongly encourages the Forest Service to provide specific guidance on mitigating the adverse effects of climate change in its FEIS.

2.As regards carbon stewardship as needs, issues, drivers of action alternatives, and subjects of detailed analysis. The Forest Service clearly recognizes the effects of climate change (current and predicted) on species composition, stand structure, and ecological processes in our Forests, and the contribution our Forests make to carbon sequestration.

a). NPSO agrees with the [ldquo]desired conditions[rdquo] that promote ecological diversity and connectivity so that all native plants have habitat in the future.

Desired Conditions (CLIMATE-DC)

01 The composition, structure, and function of national forests in the Northwest Forest Plan area reflect a diversity of ecosystems, where native plant and animal communities are supported by healthy ecosystem functions and diverse, healthy, resilient habitats. Forest and non-forest habitats are actively and adaptively managed to provide landscape diversity and ecological resilience to climate change and other stressors, such as altered fire regimes, drought, insects, pathogens, and severe weather events.

02 Diverse non-forest habitat types including meadows, prairies, woodlands, and wetlands are present across the landscape to promote biological diversity, species of tribal importance, and ecological resilience to climate change and other stressors.

03 Terrestrial and aquatic ecosystems provide long-term habitat connectivity, permeability, and refugia from climate change and disturbance stressors at the landscape scale.

b) NPSO supports forest management to maintain populations of rare and endemic plant species and their habitats.

[minus] In response to impacts to endemic, refugia, or relict species, implement tactics that support the adaptation strategy of conserving genetic and phenotypic diversity, including planting and encouraging regeneration of rare and disjunct species in appropriate locations, shaded fuel breaks to protect populations vulnerable to fire, and preparation for species migrations.[rdquo] p. A1-29

c) NPSO supports any non-toxic actions that reduce weed populations. As previously stated, weeds are a severe threat to native plant communities when management activities create habitat for weed establishment.

In response to increases in invasive species establishment associated with climate change, implement non-toxic tactics that minimize the establishment and spread of invasive species, including early detection and rapid response efforts, preventing establishment during project implementation, and planting native species to compete with invasive species.[rdquo] p. A1-29

Thank you for the opportunity to comment.

[] Date: March 17, 2025

President NPSO

Attachment-Letter text: NPSO Final Comments Draft 3-17-25. 815a.docx; this is the same content that is coded in text box; it was originally included as an attachment