

Data Submitted (UTC 11): 3/17/2025 4:00:00 AM

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Comments: Northwest Forest Plan Amendment Comments

Submitted by: East Cascades Bird Alliance and Native Bird Care

March 17, 2025

Introduction

East Cascades Bird Alliance and Native Bird Care are submitting the following comments regarding the proposed Northwest Forest Plan (NWFP) amendments. Our organizations are dedicated to conserving and protecting native bird species in Oregon and the East Cascades regions.

Since its implementation, the Northwest Forest Plan has been a crucial framework for forest management and species protection. As climate change and other anthropogenic factors continue to threaten forest ecosystems and avian populations, we believe that strengthening[mdash]not weakening[mdash]the Plan's protections is essential for the continued survival of numerous bird species and the broader ecological communities they inhabit.

Current State of Avian Populations and Habitat Concerns

According to the recently released State of the Birds report for 2025 by the North American Bird Conservation Initiative (NABCI), "more than one-third of U.S. bird species are of high or moderate conservation concern." Particularly vulnerable populations include aerial insectivores (nighthawks, swifts, and swallows), western forest birds, arid and grassland birds, shorebirds, seabirds, and non-waterfowl waterbirds. All these species already face substantial population declines and will be further challenged by climate change impacts.

The climate crisis is creating multiple compounding threats to bird populations:

1. Phenological mismatches: Birds have evolved precise timing for their life cycles and migrations to coincide with resource availability, particularly the seasonal flush of insects following leaf emergence. Climate change is disrupting these critical timing patterns, causing birds to miss peak food abundance periods and leading to lower survival rates for both nestlings and adults.
2. Insect population declines: Insect populations are declining worldwide (with some studies showing drops of 75% in certain regions and a 40% decline globally). Approximately 96% of North American terrestrial birds feed their young on insects. Climate-driven and human-caused insect declines create a perfect storm, threatening insect-eating birds and their young.
3. Extreme weather events: The 2021 heat wave scorched the Pacific Northwest with temperatures reaching

121[deg]F, and it devastated wildlife, with birds among the hardest hit. Cold snaps during breeding season can reduce bird offspring survival by more than 50% in some species.

4. Habitat loss and degradation: Climate change compounds other threats like habitat loss, wildfire, and urbanization. Rising temperatures, altered precipitation patterns, drought, and extreme weather events are expected to change habitats and ecosystems throughout Oregon. Over the next century, conifer forests currently covering half the state could dramatically decline while shrublands and grasslands expand.

Bird Population Concerns and Impacts

As bird conservation organizations, we are particularly concerned about the impacts of forest management practices on avian populations in the Northwest Forest Plan region. Several key studies, including the State of the Birds report for 2025, indicate that "more than one-third of U.S. bird species are of high or moderate conservation concern," with forest birds facing particular challenges.

Documented Bird Declines

The scientific evidence demonstrates alarming population trends for several key species:

1. Northern Spotted Owl: Despite being the flagship species for the Northwest Forest Plan, this threatened owl continues to decline due to multiple compounding stressors. According to Bond et al. (2022), mechanical thinning and post-fire salvage logging severely harm spotted owl populations, while wildland fires do not cause significant population changes without post-fire logging.
2. Marbled Murrelet: This federally threatened seabird depends on old-growth forests for nesting. Forest fragmentation facilitates predation by ravens and jays, requiring at least 200-meter buffers around occupied sites to prevent edge effects, canopy openings, and corvid entry.
3. Aerial Insectivores: Species like nighthawks, swifts, and swallows have shown substantial regional declines. These birds are particularly vulnerable to climate disruptions that affect insect availability and timing.
4. Western Forest Birds: Species associated with older forests have experienced accelerated declines. According to Phalan et al. (2019), declines in bird populations associated with older forests have amplified in the post-NWFP period, which is particularly concerning given the expectation that the protection of older forests would help stabilize these populations.
5. Early-Seral Associated Species: Early-seral specialists continue to decline due to losses of broadleaf components and structural complexity in managed early-seral habitats in regions like the Coast Range and the Cascades.

Fire Facts

Research by Lesmeister et al. (2021) shows that the densest forests with the highest biomass, highest canopy cover, and highest tree densities typically have lower wildfire severity when fires occur compared to more open, lower-density forests resulting from thinning and other logging operations. These findings contradict claims that thinning reduces fire risk and helps protect bird habitat.

Key Recommendations for Northwest Forest Plan Amendments

Based on the scientific evidence and observed impacts on avian populations, we recommend the following amendments to the Northwest Forest Plan:

1. Protect and Expand Mature and Old Growth Forests in all Forest Types

The Northwest Forest Plan reserve network has been instrumental in protecting mature and old-growth forests, which are crucial habitats for many bird species. We strongly urge:

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- * Survey and document the size and boundaries of the forests as they stand today so we know what and where they are precisely and can make management plans based on those findings.

- * Survey should include forest types, ages, understory makeup, and what changes have occurred to those forests in the last 100 years (fires, logging, management, etc).

- * Maintain all Late Successional Reserves (LSRs) and their protections.

- * Include all remaining older forests in the LSRs to protect the mature and old growth that remains.

- * Eliminate the vague "dry" and "moist" categories and designate areas by forest and habitat type.

- * What is now known as "dry" forests should have management plans specific to those forest types (ponderosa pine, lodgepole pine, and juniper).

- * Dry forests, such as ponderosa pine, lodgepole pine, and juniper, should also be put into reserves and managed to protect mature and old-growth, in part to protect at-risk species such as:

- * White-headed woodpecker

- * Lewis's Woodpecker

- * Williamson's Woodpecker

- * Townsend's Solitaire

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- * Olive-sided Flycatcher

- * Common Nighthawk

- * Common Poorwill

- * White-breasted Nuthatch

- * Evening Grosbeaks

- * Mountain Quail

- * Red Crossbill

- * Retain the 80-year-old age requirement established now to allow for more mature and old-growth forest development. Make this requirement apply to all agencies.

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* Larger buffers (minimum 200 meters) should be provided around occupied endangered and threatened avian species nesting sites to prevent edge effects and predation.

* Integrate plans to restore and support specific declining old-growth dependent species, including those mentioned above, as well as:

* Northern Spotted Owl

* Marbled Murrelet

* Varied Thrush

* Brown Creeper

* Winter Wren

* Hammond's Flycatcher

* Pileated Woodpecker

* Golden-crowned Kinglet

* American Three-Toed Woodpecker

* Great Gray Owl

* Northern Goshawk

2. Protect Early-Seral Forests

Post-fire habitats are critical for the many bird species that depend on transitional environments made by high-severity fire. According to much research by USFS and other researchers, we know now that post-fire logging significantly harms bird populations that depend on these habitats. We recommend:

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* Impose large-ranging restrictions on commercial post-fire logging to ensure large fire-killed trees and large live trees remain available.

* Prohibiting salvage logging in any forest type.

* Prohibit the removal of large-diameter snags.

* Consider the documented high economic benefits of wildlife and their habitats to make management decisions versus limiting consideration to forest service jobs. The current USFS focus on agency and logging industry benefits is a conflict of interest as it is likely that those plans that financially benefit the industry will be chosen, as has been the status quo for the last 100 years.

* Protect fire-dependent species that are dependent on transitional, post-severe wildfire habitats:

* Black-backed Woodpecker

* Olive-sided Flycatcher

* Mountain Bluebird

* Western Bluebird

* MacGillivray's Warbler

* Protect broadleaf components to support species like:

* Orange-crowned Warbler

* Wilson's Warbler

- * Song Sparrow
- * White-crowned Sparrow

* A substantial part of any new forest plan should be the ecologically protective removal of non-native plants, often coming in after logging, thinning, some fires, and mowing.

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* Stop replanting: USFS tree replanting leads to dense forests that thinning and burning set out to mitigate and ignore transitional habitat types' benefits.

3. Increase Restoration of Managed Landscapes

Forest management practices can significantly impact bird habitat quality. We recommend:

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- * Focus funding and management on areas where humans live and work, not wild regions.
- * Retain native understory plant communities that provide forest birds with crucial food and nesting resources.
- * Ensure thinning projects maintain adequate canopy and understory complexity for forest-dependent bird species.

4. Integrate Climate Adaptation Strategies

As climate patterns shift, forest management must adapt accordingly. We recommend:

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- * Manage for natural carbon sequestration and long-term carbon storage through the development and protection of mature and old-growth forests.
- * Protect older, closed-canopy forests that both provide habitat and moderate fire behavior.
- * Maintain and enhance landscape connectivity to allow species movement in response to changing climate conditions.

5. Strengthen Aquatic Conservation Strategy and Support Beaver Restoration

Aquatic ecosystems are critical for many bird species. Studies show riparian corridors with intact native vegetation support higher bird diversity and abundance. We recommend:

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* Protecting riparian areas with adequate buffer zones to support both aquatic and terrestrial bird species, particularly riparian-dependent birds such as:

- * American Dipper
- * Willow Flycatcher
- * Yellow Warbler
- * Common Yellowthroat
- * Lincoln's Sparrow
- * Yellow-breasted Chat

* Not reducing the width of riparian reserves within matrix lands.

* Adding "source water protection areas" as a Tier 3 key watershed category.

* Explicitly providing for beaver restoration at scale, recognizing the positive relationship between beaver-created wetlands and bird diversity.

* Incorporating recommendations from the Climate Adaptation Library, including increasing water storage through beaver population management and restoring beaver habitat to combat low flows

* Creating specific standards to protect habitats for water-dependent birds facing significant declines, such as the Harlequin Duck.

6. Adopt Robust Species Protection Measures

The 2012 Planning Rule creates new obligations for "species of conservation concern." Recent research by Phalan et al. (2019) found that bird declines in the Pacific Northwest have accelerated in the post-NWFP period, indicating that existing protections have been insufficient. We recommend:

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* Adopting comprehensive protections for species of conservation concern with emphasis on those with:

* Limited dispersal abilities

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* Sensitivity to management impacts

* Climate change vulnerability

* Establishing robust monitoring programs to ensure long-term species viability.

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* Creating a transparent and scientifically rigorous process to determine species of conservation concern.

* Incorporating specific measures to address the documented decline of aerial insectivores, particularly:

- * Common Nighthawk
- * Common Poorwill
- * Vaux's Swift
- * Violet-green Swallow
- * Tree Swallow
- * Black Swift
- * Western Bluebird
- * Mountain Bluebird

* Addressing the special needs of birds that require both early-seral and older forest habitats at different times or for different purposes, such as:

- * Band-tailed Pigeon
- * Rufous Hummingbird
- * Hermit Warbler
- * Western Tanager

The Scientific Case for Bird Conservation Through Forest Protection

The evidence is clear that protecting mature forests and creating complex early-seral ecosystems benefits avian biodiversity. Studies by Bond et al. (2022) have shown that mechanical thinning and post-fire salvage logging harm spotted owl populations, while leaving burned areas intact generally does not negatively impact these birds. Bradley et al. (2016) demonstrated that forests with higher levels of protection had lower fire severity, contradicting arguments that logging is necessary for fire prevention.

The relationship between habitat and bird populations is direct and significant. Lesmeister et al. (2021) found that older forests often function as fire refugia, with the densest forests sometimes experiencing lower wildfire severity than more open, managed stands. These findings highlight the false dichotomy frequently presented between forest protection and fire management.

Conclusion

The Northwest Forest Plan has been vital in preserving biodiversity, particularly species associated with late-seral forest ecosystems. Its success is traceable to its foundations in conservation biology, particularly its adoption of a network of reserves protecting rare and at-risk habitats. Rather than weakening these protections, we urge you to build upon the Plan's success by strengthening existing protections and expanding them where necessary.

As climate change continues to impact forest ecosystems and bird populations, now is the time for

increased[mdash]not decreased[mdash]protection of the habitats that support the rich biodiversity of the Pacific Northwest. The loss of bird species is not just a conservation concern but an indicator of ecosystem health that also affects human communities.

Our organizations stand ready to engage with the Forest Service throughout this process as you develop amendments to the Northwest Forest Plan, and we are prepared to offer further specific guidance on bird monitoring and habitat requirements as implementation proceeds.

Respectfully submitted,

Native Bird Care and East Cascades Bird Alliance

Citations:

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ATTACHMENT-Letter text: East Cascades Bird Alliance and Native Bird Care NWFP Amendment
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Regional Forester
March 17, 2025

U.S. Forest Service 1220 SW 3rd Avenue Portland, OR 97204

Please accept these comments on behalf of the East Cascades Bird Alliance and Native Bird Care.

East Cascades Bird Alliance and Native Bird Care have submitted comprehensive comments regarding the proposed amendments to the Northwest Forest Plan (NWFP). Our organizations, dedicated to conserving and protecting native bird species in Oregon and the East Cascades region, emphasize that strengthening[mdash]not weakening[mdash]the Plan's protections is essential for bird species survival and broader ecological health.

The 2025 State of the Birds report indicates more than one-third of U.S. bird species are of high or moderate conservation concern, with forest birds, aerial insectivores, and other species facing substantial population declines. Climate change exacerbates these challenges through phenological mismatches, insect population declines, extreme weather events, and habitat degradation.

Our key recommendations include:

1. Protect and expand mature and old-growth forests in all forest types, including maintaining Late Successional Reserves, implementing larger buffers around endangered species nesting sites, and developing specific plans for old-growth dependent species.
2. Protect early-seral forests by restricting post-fire logging and prohibiting salvage logging, recognizing the critical importance of transitional environments for many bird species.
3. Increase restoration of managed landscapes by focusing on areas where humans live and work, retaining native understory plants, and ensuring thinning projects maintain adequate canopy complexity.
4. Integrate climate adaptation strategies by managing for carbon sequestration, protecting closed-canopy forests, and maintaining landscape connectivity.
5. Strengthen aquatic conservation through adequate buffer zones, beaver restoration, and protecting riparian-dependent birds.
6. Adopt robust species protection measures for birds with limited dispersal abilities, management sensitivity, and climate vulnerability.

Scientific evidence supports our position. Studies show that protecting mature forests benefits avian biodiversity, mechanical thinning, and post-fire salvage logging harms endangered and at-risk bird populations, and older forests often function as fire refugia. Dense forests typically experience lower wildfire severity than more open, managed stands, contradicting arguments that logging is necessary for fire prevention. As climate change intensifies, we urge increased protection of habitats supporting the Pacific Northwest's rich biodiversity. Our organizations stand ready to engage with the Forest Service throughout this process and offer specific guidance on bird monitoring and habitat requirements.

Thank you,

[], East Cascades Bird Alliance Elise Wolf, Native Bird Care

ATTACHMENT-Letter text: ECBA NBC Letter.pdf; this is the same content that is coded in text box above; it was originally included as an attachment