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Organization:

Title:

Comments: NW Forest Plan Amendment comments:

My name is Phyllis Reed, I have been involved in forest management within the NWFP area for over 30 years. I am a local resident of a community impacted by the management strategies for national forest lands within the NWFP management area.

I am specifically concerned with the plan components having sufficient flexibility to respond to new information without another 30 years passing before another plan update. I am concerned with the limited time for public response to the proposed plan changes that have been under development for several years with full-time personnel assigned to various plan segments, and the limited opportunities for public members to have meaningful interaction with USFS staff to better understand the intricacies of the proposed action. I suggest an extension of the comments period due to the numerous competing issues for the public's time between Nov. and March. I am concerned that my comments might not be in a proper format to be considered or responded to or will be written off as not within the scope of the issues of the proposal - not substantive. I am concerned that the issues that are described are targeted at certain aspects of biological resources, but do not necessarily address the long-term sustainability for the biological resources or the communities located proximate to NFS and economically connected to forest resources.

My comments are focused on the west-side, moist forest communities that I am most familiar with, and in the consequences of the Standards and Guidelines or Plan components of the proposed action as described in the Draft EIS. Section 1.2.2 identifies the need for the USFS to adapt their management strategies to current and future challenges. In order to continue to incorporate new information into management strategies, the agency needs flexibility and plan components that will be adaptable over time and not stifle use of new, evolving information. I support Alternative D with the utilization of the described forest and fire components applied across both dry and moist forests, and identification of a means (Plan Component) to update the plan periodically with new information.

Tribal - I support and commend the development of the tribal inclusion portions of the NWFP amendment as outlined in A1-1 to A1-13. These guidelines are integral to meeting the 7 issues identified in the DEIS Vol 1 on pages 1-10 and 11.

It is not clear how tribal values will be incorporated in management of all LMAs: On page A1-6 tribal - one of the tribal goals in 01 is to recognize tribal role in the forest ecology. Page A1 -7 Standards - 01, recognizes tribal cultural species to be prioritized in ongoing forest health management. Please clarify how the tribal values of forest management for first foods which include early seral forests would be accommodated in LSRs where in the past old forest conditions were the sole focus of restoration activities and hindered the incorporation of early seral forest stages in LSRs.

In the Plan Components common to all (FORSTW-ALL) found on page A1-14-16 in DC 02 to 07, the components describe a landscape managed to reflect a full range of seral stages. I support the proposed action of a landscape that would have a full range of seral stages in all LMAs, including LSRs. This would support the proposed amendment needs (Vol 1 page 1-6) by addressing tribal co-management goals and objectives, forest need for biodiversity and implementing trust responsibilities. I recommend that the desired conditions and components in FORSTW-ALL-DC 01 to 07 apply in all LMA: matrix, LSR and RR.

Alternatives considered but eliminated - Vol 1 page 2-24:

I disagree with 2.4.2 that the survey and manage program is needed to be consistent with the purpose and need of the proposed action. Given that survey and manage species were in the 1994 amendment species associated with mature and old forest as described in the REO website: <https://www.fs.usda.gov/r6/reo/survey-and-manage/> "At the NW Forest Plan's initiation in 1994, it was unknown whether the reserve network and other standards and guidelines would offer a reasonable assurance of persistence for many rare and little known species thought to be associated with late-successional and old growth forests (including mosses, liverworts, fungi, lichens, vascular plants, slugs, snails, salamanders, and red tree voles). Therefore, a set of management standards and

guidelines, known as "Survey and Manage," were added to the Plan requiring surveys before initiating management actions and limitations on actions if found. Three basic criteria must be met for species to be included in the standards and guidelines:

- 1.The species must occur within the Plan area or occur close to the NFP area and have potentially suitable habitat within the Plan area.
- 2.The species must be closely associated with late-successional or old-growth forest.
- 3.The reserve system and other standards and guidelines of the Northwest Forest Plan do not appear to provide for a reasonable assurance of species persistence."

There have been 30 years of surveys of these species to hone our understanding of these species' habitat, but there has been little update in the survey and management strategy since 2001 (2001 Amendment to the Survey & Manage, Protection Buffer, and other Mitigation Measures Standards and Guidelines) or 2006 (Pechman exemption). The survey and manage strategy is seriously outdated (see history of the survey and manage on pages 3-56 to 61). The current proposed action alternatives include additional identification of mature and old forest retention (see Forest Stewardship Matrix page A2-11), which supports meeting the criteria of reasonable assurance of these species' persistence. Additional studies of survey and manage species in pages 3-56 to 61 described the persistence of these species within the current management of the landscape. Therefore, the outdated survey and manage program is extraneous to the purpose and need as described in Section 1.3. The draft EIS does not explain or describe the need for the continuation of this program given the alternatives developed with additional retention of habitat associated with the survey and manage species. Please elaborate why the survey and manage program is still needed given all the protections for survey and manage species habitat provided in old forest management and the proposed alternatives, along with down wood, and snag retention. There is also no need for survey and manage surveys to be completed before a decision is made on an individual project since a project can be modified if the species is found before implementation.

Monitoring - Page 2-25 and 26

I disagree that the current monitoring plan is effective in determining the desired result of Forest Plans as amended by the NWFP. One of the goals of the 1994 amendment was to provide sufficient suitable habitat for the recovery of the spotted owl, and the marbled murrelet, as well as other old forest associated species. The plan's monitoring does succeed in providing information on the amount and condition of the old forests in the region, but the population monitoring for the spotted owl and marbled murrelet does not tease apart other factors (beside adequate nesting habitat) acting on these species in determining the success of the NWFP in supporting target old forest species. The barred owl competition to spotted owl has been as influential as amount of old forest, and the NWFP monitoring of old forest as potential murrelet nesting habitat has not factored in the marine habitat and its forage influences to the murrelet in monitoring population success. If monitoring results are to be utilized in determining the success of the plan in achieving desired goals, the selected alternative should have a component to update the Forest Plan as new information is gained with responsible official, Forest Supervisor, authorization. There is a need for flexibility to be built into the standards and guidelines or plan components so as to respond to "best available science" and new information as it evolves. Alternative D of the proposed action alternatives provides the most flexibility, all action alternatives should include the means to adjust standards and guidelines, or plan components based on new information gained in monitoring. This review could be done at the Forest Supervisor level in reviewing new information and potential effects.

Issue I - Incorporation of Indigenous knowledge and increased tribal inclusion

I support the objectives developed (Vol1 3-10-11) for tribal engagement. I caution that the implementation of these objectives would be influenced by staffing and the capacity of the Forest Service. I support Alternative D on pages 3-13 and 3-14, with the addition in TRIBAL- FORSTW-All-PMA -D (page A2-6) to include restoration and maintenance of non-forest habitat and early seral habitat in moist forest landscapes. This addition would more fully address Alternative D's move toward recognizing the importance of both non-forest and early seral forest habitat for culturally significant species and support to First Foods.

Forest Stewardship -Issue 2

I support forest stewardship as described in common to all FORSTW-ALL-GDL-03-B and D (pages 2-11, A2-6 and 7). Especially noteworthy is the recognition of landscape context and extent, size, shape and configuration

of patches of different seral stages in all action alternatives to provide biodiversity, diverse wildlife habitat, and desired conditions based on incorporating new information relevant to the NWFP (pages 1-4 and 1-5).

I support the Forest Stewardship description on 3-25 for all action alternatives of FORSTW-ALL-MOI -DC-01/02/03 for forest management in moist forest LSRs. The management strategy of recruitment of large blocks of old forest interspersed with other habitat including complex early seral would be more responsive to local conditions, needs and agents of forest stand reinitiation. I support the guidelines on page 3-26, (FORSTW-LSR-MOI -GDL-01-B/D) to improve/maintain old forest; to restore habitat for other species that depend on younger stands and achieve other conditions fostering tribal co-management and cultural use. I also support the shift in management limits from 80 to 120 old stands. This LSR management strategy is important for flexibility to meet the full range of management options, and if a stand is not meeting desired conditions to have the option for silvicultural management.

I disagree with the no salvage in moist forest LSRs (FORSTW-LSR-MOI-STD-02). The loss of salvage options reduces management opportunities to meet biodiversity, to limit insect outbreaks and to limit potential fuel loading. FORSTW-LSR-MOI-STD-02-D with no stand age limit on salvage provides the most flexibility in stewardship, and management objects for biodiversity and cultural objectives.

#### Fire Resilience - Issue 3

I agree with the Fire Resilience objectives in alternative D with objectives applied to all Land Allocations both dry and moist forest. While the west-side is thought to be fire infrequent (page 3-39), the last five years (2020 to 2024) have resulted in fires of several thousand acres with both stand replacing and understory burn intensity. I support the descriptions of options for prescribed burn activity, but current restrictions for air quality, limited windows for prescribed burn conditions, potential lack of staff and resources to accomplish the burns, therefore, all action alternatives for fire resiliency should include silvicultural management options to reduce fuel loading with fuel removal by both commercial and non-commercial means.

#### Biological Resources - Issue 4

I support the NWFP concept of large, interconnected blocks of old forest to support species associated with the structure and habitat of those older forests. I do not support the exclusion of other forest stages in LSRs or RR since those forest stages are important for meeting the ecosystem integrity and diversity goals of the 2012 planning rule (pages 1-6 and 7). Other forest stages provide for a more balance aged class distribution of forest conditions important for resiliency and sustaining a diversity of animal communities. I support the aquatic, riparian and wetland Plan Components as described on page 3-73. These Plan Components would assist in meeting ACS objectives #8 and #9 (ROD B-11).

#### Sustainability of Communities- Issue 7

The DEIS reports that following the 1994 NWFP adoption, there were large decreases in volume offer on the National Forest, a drop in the number of mills and other infrastructure reductions that accommodate forest management and timber harvest, pages 3-100 to 3-131 of the affected environment section. Recreation's contribution is described as National Forest visitation, employment and income, and visitor spending from page 3-131 to 135, with livestock grazing covered on pages 3-135 to 138. The forest products' environmental consequences are covered in a scant 3 pages which seems a disproportionate low disclosure of the alternatives consequences on the social economic sustainability or wellbeing of communities and the region. Please provide more discussion on how the alternatives would affect long-term sustainability (issue 7) The 1994 NWFP plan was projected to provide a reduced, but steady timber supply which did not materialize. What changes have been made in the plan components to meet the need on page 1-5 of "providing a predictable supply of timber and non-timber products"?

Recreation - While I appreciate the discussion on the contributions of outdoor recreation spending to the social-economic of communities and counties within the region, (Table 3-24 and page 3-134), I am concerned that the discussion does not clarify the forests' recreational contribution to the local communities or the region. The trip related expenditures in Table 3-24 are reported in the note below the table as including not only NFS and BLM lands, but also other lands managed by federal agencies, state agencies and local parks. I am concerned that this may provide an elevated expectation of recreational contributions from forest lands to the economy. On page 3-134, the studies evaluating the value of outdoor recreation are reported as including the spending on

equipment, such as bikes, fishing rods, backpacks, and seasonal rentals. The spending on these items and related sales jobs while contributing to the overall economy and would not necessarily be contributors to the social-economics of local Forest communities.

Other Resources Considered or Dismissed - 1.10 -page 1-11 to 1-12.

#### Effects of the Proposed Alternatives on the Use of Recreational Areas

I disagree with not assessing the proposed actions effects on the use of recreation areas and the alternatives effects from recreational to other resources. While I agree that a full description of the scope, extent and location of the alternatives' effects cannot be determined at this time, the plan components can provide additional guidelines on recreational activities' consistency or non-consistency with the Alternatives. The current ROD has limited standards and guidelines for recreational management within Riparian Reserves (C-34) and in LSRs (ROD C-18). While these S&Gs are limited in the descriptions of what recreation development is considered consistent with the NWFP land management allocations, they can be limiting when strictly interpreted given the large amount of RR and LSR on some Forests.

#### Adaptive Management Areas

I disagree with the loss/disbanding? of the AMAs in the proposed action alternative. These areas described management objectives in the ROD D-1 to D-17 and were envisioned to encourage the development and testing of alternate technical approaches to achieving desired ecological, economic and social objectives. I agree with the allegation that these areas have not been fully utilized as a geographic focus of innovation and experimentation, but that is not sufficient reason to throw out the concept. Why not ask why these AMAs were not more utilized as hotbeds of innovation? In the case of one of the areas, I feel the REO, the internal review group, was very conservative in their review of an AMA treatment proposal and without support from the Region, the proposal withered. I propose that if the AMAs are shifted to designations of matrix or LSR, the AMAs would continue to have a Plan Component that recognizes the need to have a developed AMA Plans (based on the ROD Section D- Adaptive Management) for those areas with full participation in AMA Plan development/update by both tribal and public participants.

With Regards,