Data Submitted (UTC 11): 3/18/2025 4:00:00 AM
First name: Karie
Last name: Decker
Organization: Rocky Mountain Elk Foundation
Title: Director of Wildlife and Habitat
Comments: Good morning,

Please find attached, RMEF comments on the DEIS for the NW Forest Plan Amendment.

Thank you,

Karie

March 17, 2025

Jacque Buchanan, Regional Forester, Pacific Northwest Region Jennifer Eberlien, Regional Forester, Pacific Southwest Region 333 SW 1st Ave

PO Box 3623

Portland, OR 97208-3623

RE: Northwest Forest Plan Amendment, Draft Environmental Impact Statement

The mission of the Rocky Mountain Elk Foundation (RMEF) is to ensure the future of elk, other wildlife, their habitat, and our hunting heritage. We represent thousands of members nationwide, many of whom recreate within U.S. Forest Service (USFS) lands. Since its inception in 1984, RMEF has conserved or enhanced more than 9.1 million acres of North America[rsquo]s most vital habitat for elk and other wildlife. In partnership with the USFS, RMEF has conserved or enhanced more than 3.9 million acres across USFS-administered lands and opened or improved public access to over 366,000 acres. Together, the combined value of RMEF-USFS cooperative efforts exceed $408 million.

RMEF appreciates the opportunity to comment on the Draft Environmental Impact Statement (DEIS): Northwest Forest Plan (NWFP) Amendment.

The DEIS states the following Purpose and Need topic areas:

* Improving wildfire resistance and resilience across the NWFP area
* Improving conservation and recruitment of mature and old-growth forest conditions, ensuring adequate habitat for species dependent upon mature and old-growth ecosystems, and supporting regional biodiversity
* Providing a predictable supply of timber and non-timber products and other economic opportunities to support the long-term sustainability of communities located proximate to National Forest System lands and economically connected to forest resources

Several Plan components appear to be in opposition to the stated Purpose and Need, particularly related to restrictions on timber harvest and fuels treatments in old-growth areas. The proposed amendment is predicated on the assumption that old-growth forests are underrepresented on the landscape and face an existential threat unique to their successional stage. RMEF requests the USFS provide significant detail about how it determined that old- growth is underrepresented within the National Forest System and specify the old-growth volume ideal for maintaining forest health.

In June 2024, the USFS released the [ldquo]Mature and Old-Growth Forests: Analysis of Threats on Lands Managed by the Forest Service and Bureau of Land Management[rdquo] (threat analysis). The threat analysis concluded that wildfire and insect/disease, threats that are best mitigated through active management, present the greatest hazard to old-growth. The threat analysis found that old-growth volume increased at a higher rate in non-reserved areas than reserved areas, affirming RMEF[rsquo]s long-held philosophy that restrictive land management negatively impacts forest health. The USFS concluded that [ldquo]strictly reserving mature and old-growth forests may not always ensure that they are protected from future losses.[rdquo] The USFS[rsquo]s Wildfire Crisis Strategy pledges to drastically increase the pace and scale of forest management to mitigate wildfire risk across the National Forest System. That the USFS would simultaneously call for management restrictions in old-growth to accomplish the same objective of mitigating wildfire risk is inconsistent. RMEF requests the USFS clarify why increased management is required to mitigate wildfire across the National Forest System, but restrictive management is required to mitigate wildfire in old-growth. RMEF also requests the USFS explain why the Wildfire Crisis Strategy is incapable of addressing wildfire risks in old-growth.

RMEF is concerned that elevation of old-growth as the ecologically preferable successional stage will be the application by line officers, perception by the public, and interpretation by the courts. Old-growth forests, by definition, will face a higher mortality rate over time. A paradigm that prioritizes the expansion of old-growth without respect to other ecological considerations, if carried out to fruition, would lead to dying forests with an even higher risk of wildfire and insect/disease and decreased biodiversity.

RMEF further cautions that elevating old-growth will hinder the ability of the USFS to optimize carbon stewardship, biodiversity, and resilience. The carbon storage capabilities of old-growth should not be overstated. Forests are not static. Late successional trees currently store significant amounts of carbon; however, they are approaching a state of dormancy which is marked by reduced carbon sequestration rates and increased carbon emissions as they undergo senescence and decay. Younger forests are generally more effective at sequestering

carbon due to their rapid growth rates and high photosynthetic activity. Old-growth is also not synonymous with biodiversity and RMEF cautions that prioritizing old-growth, irrespective of other ecological factors, will also have significant implications for wildlife. Early successional habitat provides forage and cover necessary for the survival of elk and other wildlife species and facilitates a rapid recovery from natural disasters, contributing to the overall resilience of a forest. RMEF reiterates the suitability of mosaic forests in achieving a wide range of ecological objectives, including the resiliency of old-growth stands.

Forest Stewardship

The ecological integrity of forest ecosystems is dependent on maintaining vegetation diversity. RMEF supports a focus on a more heterogeneous forest structure, restoring

more frequent fire, increasing reforestation, and sustaining the existing late successional stage, all with an adaptive management framework given changing conditions and new information.

Given the importance of timber harvest for managing fuels and wildlife habitat, RMEF encourages creative solutions to maintain timber as a predominate factor in sustainable forest management, particularly given recent local industry closures.

Many components under Alternative B would further restrict timber harvest in Matrix Land Use Allocations (LUA), which is where the NWFP states wood fiber and timber harvest is to come

from. Also, creating mature and old growth in Matrix LUA further reduces the harvestable area of the Matrix LUA. As-is, several components in this alternative would not move toward desired conditions within the proposed timelines. Alternative C would result in a reduced pace, scale, and intensity of treatments than Alternative B and would not move to meet the Purpose and Need of the Amended Forest Plan. Several components under Alternative D would increase flexibility for more intensive treatments, which may assist in reversing the effects of long-term fire exclusion in dry forests. Generally, Alternatives B and D aim at providing a diverse forest landscape with stands of different ages that manage for wildlife needs of species dependent on old-growth forests as well as those associated with younger forests. Forest management objectives in Alternative B are the greatest for dry forests in both Late-Successional Reserve (LSR) and Matrix, while Alternative D has the highest harvest objective for moist forests in the Matrix.

Specific component support:

* FORSTW-LSR-MOI-STD-02: Support Alternative D as it would be the only alternative to allow salvage harvest to reduce wildfire risk.
* FORSTW-MTX-MOI-OBJ-01: Support Alternative D as it allows twice the amount of treatment in young stands than the preferred alternative.
* FORSTW-ALL-DRY-OBJ-01: Support Alternative B as it allows for the greatest number of acres treated that contribute to ecological resilience.
* FORSTW-ALL-DRY-GDL-03: Support Alternative B as it is the only alternative permitting fuel management salvage when beneficial to restoration goals, fire resilience, wildlife needs, and local communities.

* FORSTW-ALL-DRY-PMA: Support Alternative D as it is the only alternative supporting management through wildland fire, with an aim to create a sustainable range of seral stages, reflecting the characteristic fire frequency and severity of these landscapes.

Fire Resistance and Resilience

RMEF supports a landscape-scale approach to increase the pace and scale of fuels reduction across the Northwest Planning Area. USFS lands have been at the forefront of severe wildfires over the past several years. The impacts of larger and more severe fires have been widespread, affecting wildlife habitat, recreational opportunity, and local economies. Given the multiple landowner framework of the planning area, RMEF recommends including cross-boundary opportunities for active management and fuels reduction across private, state, and federal lands using tools such as good neighbor authority, shared stewardship, etc.

Generally, the components under Alternatives B and D increase forest treatment in areas near and adjacent to communities in a manner that would enhance resilience of these stands while decreasing the long-term wildfire risk to communities. Alternative C would result in a reduced pace, scale, and intensity of treatments and thus not move toward the desired conditions, nor meet the Purpose and Need. Alternatives B and D focus on restoring and maintaining natural fire regimes and reducing the negative impacts of wildfires to watershed health, wildlife habitat, and community values at risk. However, direction under Alternative B provides for treatments primarily for the purpose of reducing risk to communities, rather than to improve natural resource conditions; whereas Alternative D provides more flexibility for forest restoration and wildfire risk reductions treatments (across all LUAs) and encourages fuels treatments close to communities.

Specific component support:

* FIRE-ALL-OBJ-01: Support Alternative D as it allows for significantly more treated acres comparted to other Alternatives (4.95 million acres per decade). However, this component indicates that all acres treated under FIRE-ALL-OBJ-02-D would be included in the 4.95-million-acre total. This statement should be removed to optimize treatments for resource-specific needs.
* FIRE-ALL-OBJ-02: Support Alternative D as it allows for 2.75 million acres of wildland

fire treatments to meet resource objectives.

* FIRE-ALL-GDL-05: Support Alternative D as a Guideline (GDL) rather than the Alternative B plan component under this topic that proposes it as a Proposed Management Action (PMA). Guidelines provide more meaningful, measurable plan requirements and are less lofty than PMA plan components. As a Guideline, this component would require the use of wildland fire to meet multiple resource objectives, including habitat enhancement for wildlife.

Biological Resources

The DEIS states that [lsquo]Due to the great diversity of wildlife species, and the programmatic level of this effort, this Draft EIS does not assess the potential effects of the proposed amendment on general wildlife and plant species including Region 5 and 6 Management Indicator Species. Site-specific effects analysis to general wildlife and plants would continue to be assessed during project-level NEPA analysis and ongoing forest plan

monitoring.[rsquo]

While there is an extensive list of wildlife species across the planning area, there are several species that contribute significantly to ecosystem integrity and deliver ecosystem services (recreational, aesthetic, vegetation health, etc.). In addition to at-risk species, the Forest Plan is integral in helping ensure common species remain common. RMEF requests the Amendment recognize specific species (like elk and other big game) as important species providing economic and community value. Furthermore, RMEF requests an effects analysis of these key species and their full integration in the Forest Plan Amendment. To ensure a comprehensive review, Amendment should analyze all species that are in the current Northwest Forest Plans.

While there are no specific plan components under this section, RMEF supports components that aim to improve or increase early-seral forest habitat. RMEF is very supportive of active management on our public lands to benefit wildlife habitat and fire risk management. Executing active forest management techniques such as prescribed burns, thinning, and other treatments helps prevent severe wildfires, assists in long-term ecosystem resilience and provides important forage resources for wildlife. In addition, managing natural ignitions can help achieve fuel and vegetation goals.

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RMEF appreciates the opportunity to review the DEIS and looks forward to future engagement. Sincerely,

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Director of Wildlife and Habitat

ATTACHMENT-LETTER TEXT: RMEF Comments_2025 NW Forest Plan DEIS.pdf; this is the same content that is coded in text box; it was originally included as an attachment