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Comments: Wayne Rolle's response to the USDA Forest Service's November 2024 Draft Environmental Impact Statement (DEIS) for Northwest Forest Plan Amendment

From Wayne Rolle on 3/6/2025

I'm a retired Forest Service Botanist. I supported creation of the 1994 Northwest Forest Plan, spent 22 years helping the agency implement its provisions on Rogue River-Siskiyou National Forest, and am now pleased to see the Forest Service proposing sensible amendments in this DEIS.

In the interest of brevity, my response herein uses acronyms already recognized, defined, and commonly used in the DEIS.

I concur with the Purpose and Need outlined in the DEIS. However, other than the brief phrase "supporting regional biodiversity" in the third "need" bullet in sub-section 1.2.2, I did not see any mention of the need to allow limited maintenance, enhancement, and restoration activities on behalf of rare or locally unique early seral or non-LSOG species and locally unique habitats where these occur within LUA's dedicated to LSOG species and habitats. If the Forest Service can't find a place for this in the FEIS Purpose and Need, I request that it be included as one of your major issues you analyze throughout the FEIS (subsection 1.9 Issues), perhaps as a stand-alone issue or expressly included as a specific part of Issue 4 - Biological Resources. Note that this is not the same as Tribal Inclusion activities on behalf of culturally significant species and culturally relevant habitats as discussed and provided for in many sections of this DEIS.

I believe that both Alternatives B and D meet the Purpose and Need as stated in the DEIS and are significant improvements over the no-action alternative. While it has some attractive features, I am much less supportive of Alternative C because its emphasis on natural processes (as opposed to active restoration treatments) is likely to limit its effectiveness at meeting that Purpose and Need.

Among all action alternatives, I am most supportive of Alternative D because it meets the DEIS-stated Purpose and Need, provides best for ecological processes in dry forest and dry LSRs, and seems to allow the most opportunity among these alternatives for locally unique species and habitats which are not closely associated with Late Successional/Old Growth forest to persist in LUAs dedicated to LSOG species and habitats.

In the DEIS, proposed new plan direction for dry forest in all action alternatives, in all LUAs (FORSTW-ALL-DRY-STD-01) has "exceptions" for "restoration of unique ecosystems" (and for other reasons) (DEIS Table 2-1 on page 2-18). I support this exception. It obviously helps facilitate planning for the needs of rare and locally unique early seral and non-LSOG species and habitats. However, the criteria to allow this exception on-the-ground, and the procedural steps required of a National Forest or Ranger District to formalize an exception, are not described any place I can find in either DEIS volume 1 or volume 2 (appendices). And why not allow this exception in moist forest or moist LSRs? In addition to my 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, I 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 this exception on-the-ground, and procedural steps to do it, be described in the FEIS.

Question: Why was Issue 4 - Biological Resources not addressed in DEIS Table 2-1? Most of the other major issues had at least 1 row in that table and many of those issues merited multiple rows. I would encourage

including components of the alternatives that address this already-identified major issue in Table 2-1 in the FEIS.

If any action alternative is eventually implemented, my assumption is that both RIEC and REO will be vastly different compared to when they were established in the 1990's. The FEIS should explain how RIEC and REO would be structured and operate if any action alternative or variation thereof is chosen in a new ROD.

I appreciate that the DEIS acknowledges the ongoing effects of climate change and 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.

Although I haven't closely studied every statement made in Appendix C: Draft Biological Evaluation, I concur with the approach and format used. As you suggested, I will look for Biological Assessment determinations for the Federally-listed species in the FEIS. I will expect determinations of effects on individual species in Forest-level project-specific Biological Evaluations to be supported by logic and narrative, but are not requesting that level of detail for the hundreds of species and huge geographic areas covered in this programmatic NEPA. Professional mycologists might take issue with lumping fungi with plants in the biological evaluation, since fungi are neither plants nor animals. However, I am comfortable with the lumping of fungi with plants in this biological evaluation since botanists are often the agency resource professionals paying the most attention to the needs of fungi during forest management activities.

Appendix D. Current Northwest Forest Plan Survey and Manage Species displays the December 2003 Survey and Manage Species list. I am regrettably aware that this is still, more than 2 decades later, in use by the agency as the "current" Survey and Manage Species list. The January 2001 Record of Decision and Standards and Guidelines for Amendment to the Survey & Manage, Protection Buffer, and other Mitigation Measures Standards and Guidelines commits the agency to conducting an annual "Species Review Process" to keep the Survey and Manage list current. The process was conducted in 2001, 2002, and 2003. The affected environment sub-section about Survey and Manage Species in this DEIS (page 3-56) does not explain why the annual Species Review Process doesn't seem to have occurred since 2003 (over 21 years!). I am not requesting that this explanation be provided. I know it is due in part to legal entanglement from 2004 through 2014 but suspect a lack of internal or external pressure to conduct the review is also to blame, at least after 2014. Anyway, as a consequence, the Survey and Manage List has slowly lost credibility among natural resource professionals over the last 2 decades. There is solid new information generated since 2003 by the Forest Service and cooperators about individual species which indicates there are 1. Species on the list which don't deserve S&M status, or 2. Species on the list which merit an S&M category change or geographic restriction, or 3. Species which merit inclusion on the S&M list but have never been added. I am requesting that conducting this long overdue "Species Review Process" be formally included in all action alternatives with completion of the process scheduled for a specific year soon after the FEIS is published and a ROD issued. If a specific animal is a hang-up or obstacle to getting this done (red tree vole for example), complete the review of the hundreds of other species which are not the cause of the hang-up, then disseminate the updated list for use on the National Forests.

Closing information: I was one of 4 members of the Native Plant Society of Oregon (NPSO) that were asked to collectively suggest text that NPSO's state board might submit in response to the DEIS. Our group of 4 were not able to reach consensus and the NPSO state board will probably submit a response that I don't totally agree with. But they are likely to use some of my input and identical text in formulating their response to the DEIS. You should know that they have my permission to do so and that they are not plagiarizing what I have written here.

Thank you for the opportunity to comment. Good luck on next steps.

/s/ Wayne Rolle

Retired FS botanist
Date 3/6/2025