Data Submitted (UTC 11): 3/17/2025 6:41:02 AM First name: Thomas Last name: Horning Organization: Retired Employee Title: retired fish biologist

Comments: Comments: Thank you for this opportunity to comment on the NW Forest Plan Amendment, draft EIS. My background includes a 33 year career with the U.S. Forest Service (Forest Service) with much of my career as a fish biologist on the Mt. Hood National Forest. I have provided fisheries Environmental Assessment (EA) input to many timber sale vegetation management projects, led and completed a watershed-wide fisheries habitat restoration EA, and was part of a multi-year relicensing team, working on the relicensing of Portland General Electric's hydro-projects in the Clackamas River watershed. Also early in my career, I worked for the Forest Service in Colorado as a technician doing timber sale administration, pre-sale work and assisting with wildlife prescribed burn projects.

The 1994 NW Forest Plan has been an important and pivotal planning document for the Pacific Northwest, providing direction and protection for late-successional forest and old growth related species. From my own experience, prior to the NW Forest Plan, protections for late-successional forests and species were minimal. For instance riparian habitat protection for salmon and other aquatic species was minimal with clear cutting and salvage logging, often down to waters edge. With the passage of over 25 years, I appreciate the need for change and the need for a new amendment to the NW Forest Plan.

Alternative B is the best fit: The effects of a warming climate have dramatically increased the number and size of wild fires. I believe that of the four amendments being considered, that alternative B is the best fit for dealing with the above climate related threats and providing improvements in overall management. While supportive of Alternative B, I strongly recommend the following departures or changes from Alternative B:

1. In Late-Successional Reserves (LSR) moist forest, keep the 80 year old timber harvest limit, do not harvest up to 120 yrs. old. Most young forests in moist LSR originated from timber harvest since 1945 (80 years ago). Timber harvest restoration treatments in LSRs should be limited to these densely replanted sites that are lacking old growth structure and would most benefit from treatment.

2. In FORSTW-LSR-MOI-STD-01: For Alternative B there is an exception allowed for restoration of habitat for species dependent on younger stands in LSRs. This exception in Alternative B should be removed since the intent in LSRs is to promote late successional characteristics and promote species reliant on old, complex forest habitats. Promoting younger stand development in LSRs is inconsistent with this reserve designation.
3. In FORSTW-ALL-DRY-DC-03: On page 3-91 (2nd paragraph), it talks of "desired conditions that address the need to increase the presence of native species adapted to future climate in moist forests." It also talks of "planting and encouraging of rare and disjunct species". I believe this is a very important looking to the future. A great example of where this activity might be explored on the Mt. Hood National Forest is the disjunct sugar pine found in and outside of the Sugar pine Botanical Area in the upper Collawash River. This may be the furthest north stand of these trees on the west side of the Cascades. They are mostly found on warmer, west aspects in Douglas fir stands and are slowly fading out from blister rust. Genetically rust-resistant sugar pine are now available in limited amounts and could potentially be incorporated into experimental post harvest replanting in matrix lands in this area and elsewhere. This species is often found with drier climate species like ponderosa pine further south in it's range.

Thank you for all the hard of the work from the Federal Advisory Committee and Tribal input.

- T.Horning