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Comments: *We appreciate the apparent intent to expand active forest management and elevate the level of timber outputs across much of the NWFP footprint. However, many of the components in the proposed amendment that are designed to enable more active forest management will not be effective if the agency does not address the Survey & Manage standards.

Survey & Manage was designed to provide protection for over 300 species that were believed to be dependent on late successional forests. Given the vast Late Successional Reserve (LSR) network and the proposal to manage an additional 1.3 million acres of mature and old growth forest on Matrix land identically to LSR, these Survey & Manage standards are now obsolete. In fact, adhering to these standards for many species results in vast acreage being "off limits" to active management, much of it on dry fire-prone forests. Due to these fire risks and the inability to mitigate them through active forest management, the Survey & Manage standards are harming the very species it aimed to protect. The Forest Service must remove the Survey & Manage Standards and Guidelines through this amendment.

*The original NWFP limited the land base suitable for timber production to less than 15% of the plan's footprint. This 15% constitutes what is referred to as the Matrix land use allocation (LUA). It has been well documented that the timber levels promised on this LUA were never attained. The proposed amendment includes components that will reduce this land base further. Although the amendment does not change LUAs, it does include new desired conditions, standards, and guidelines that effectively transition over 1.3 million acres of "moist mature and old growth" Matrix lands to quasi LSRs. That represents over half of the existing moist Matrix LUA.

To address this change, the amendment must include desired conditions that explicitly identify timber production as the primary focus on stands identified as Young Moist Matrix.

*Despite the clear intent to expand active management and timber harvest on all stands identified as Dry Forest across all LUAs, it must be noted that the proposed desired condition will likely inhibit sustainable timber production in the long term on these lands.

That proposed desired condition calls for the presence of large, old trees and the absence of small, young trees in areas directly surrounding them. Based on review of the DEIS and participation in the public webinars following its release, our understanding is that the directive on all Dry Forests following initial timber harvest is guided by the concept of forest "maintenance" where periodic controlled burns will be applied to maintain the "absence of small, young trees." This approach has merit from a hazardous fuels reduction perspective but will ultimately result in the inability of these forest stands to provide a sustainable supply of timber products in the future.

*As noted above, the proposed amendment, through its standards, guidelines, and desired conditions, limits sustained yield timber management to approximately 5% of the National Forest System (NFS) lands (1 million acres of Young Moist Matrix out of the 19.7 million acres of NFS land governed by the NWFP). This change is a function of the proposed modifications to dry forest management and the modifications to desired conditions of 1.3 million acres of "mature" and "old growth" moist forests in the Matrix LUA that mirror the desired conditions for LSR. To account for this reduction in suitable timber land base, the Forest Service must explore opportunities to transition "young" stands in the moist LSR system to that land base-in other words, redesignate a component of the existing LSR to Matrix.

*The amendment must also include clear standards and guidelines that ensure the Young Moist Matrix LUA is managed based on the principles of sustained yield timber management.

Since the inception of the NWFP, the primary management paradigm regarding the timber program has been dominated by intermediate thinning treatments. Such a paradigm is unsustainable, particularly in Douglas-fir dominated forests. Eventually the agency will run out of suitable acres to thin. This management paradigm must require some form of regeneration harvest to sustain itself. As such, the amendment must include directives that ensure regeneration harvest occurs on the diminished Matrix LUA.

*The amendment should consider removing the second site potential tree height buffer on riparian reserves for fish bearing streams. In certain parts of the region, these buffers exceed 400 feet on each side of the stream. This is an excessive level of protection that is not aligned with current science. When the NWFP was developed, this second site potential tree height was deemed necessary to protect "microclimate" in the reserves. Research since then has indicated that these microclimate changes rarely extend beyond a single tree height.

Furthermore, in 2016 the Bureau of Land Management (BLM) revised their Resource Management Plans (RMPs) that guide forest management on O&C Lands in western Oregon, many of which are adjacent to or intermingled with NFS lands governed by the NWFP. Through consultation with the National Marine Fisheries Service (NMFS) the BLM determined that the second site potential tree height was not warranted on fish bearing streams and adopted single tree height buffers adjacent to all streams. The Forest Service should consider similar adjustments on NFS lands to align with their neighboring federal land manager, NMFS opinion, and the best available science.

*The DEIS is unclear of how Adaptive Management Areas (AMA) should be managed. The original vision for the AMAs, testing new techniques for active forest management, was never fully realized. The amendment should clearly transition the AMAs to the Matrix LUA where their primary management objective would be timber production. This is another opportunity to partially offset the loss of Matrix lands that will be managed as quasi LSRs and not made available for timber production under the amendment.

*It is disappointing to see that the amendment prohibits any level of timber salvage in LSRs following natural disasters, particularly wildfire. Salvage is an important tool for accelerating late successional forest characteristics following stand replacing wildfire. It is also a critical tool for climate change mitigation as dead trees are no longer capable of sequestering carbon. Storage of that carbon in long-lasting wood products coupled with proactive tree planting in fire impacted areas is the most effective way to utilize these forests to mitigate climate change following disturbance.

*Directives on salvage harvest following disturbance should be strengthened. While the proposed amendment includes new prohibitions on salvage in LSRs it fails to include new requirements on salvage in the Matrix. Currently, the NWFP "allows" salvage harvest. However, it is clear that this allowance is insufficient in effectively implementing salvage across the Matrix LUA following disturbance. The failure to conduct salvage is a function of factors beyond the NWFP. However, establishing new standards and guidelines that clearly direct the agency to prioritize salvage on Matrix lands would be beneficial in attaining appropriate management following disturbance.

*It is refreshing to see the amendment proposing elevated levels of active management on dry forests. These fire prone forests, regardless of their age or origin, must be available to manage to mitigate fire risk. However, simply including new objectives that guide such management is insufficient. Any real progress on such management is incumbent on removing the obstacles to effectively managing hazardous fuels in these dry forests. Those obstacles include Survey & Manage, excessive riparian reserves, and arbitrary age limitations.

*The use of prescribed fire outside of the fire season is an effective tool for managing hazardous fuels. However, the practice of "managing" wildfires during the fire season is reckless. The proposed amendment includes new objectives that explicitly identify the use of "unplanned" ignitions to attain desired forest conditions across the landscape. This directive is extremely concerning, particularly to those who live and work in communities adjacent to National Forest System land. In this amendment, the Forest Service should explicitly adopt a policy to aggressively suppress all wildfires, regardless of land use allocations, during the wildfire to protect public health, safety, and communities.

*A predictable and robust supply of timber products is essential to funding county governments. This funding level is not only a function of how much timber is sold, but the value of that timber. The DEIS provides a comparison of treatment acres and timber volume between the status quo and the Amendment: 212,000 acres treated and 4,446 MMBF sold (21,000 MBF/acre), and 735,000 acres treated and 9,700 MMBF sold (13,000 MBF/acre) respectively. So, while the acres treated in the Amendment increase by 247%, the volume sold only increases by 118%.

This indicates lower volume per acre and, therefore, a diminished monetary value that is critical to maintain rural county services. We urge the Forest Service to revisit these calculations and the assumptions behind their results.