

Northwest Forest Plan Amendment Scoping Period: Written Public Comment Summary

Prepared for



Prepared by



EXECUTIVE SUMMARY

This report provides a summary of written public comments received for the Forest Plan Amendment for Planning and Management of Northwest Forests Within the Range of the Northern Spotted Owl (Northwest Forest Plan [NWFP] Amendment). The 45-day public comment scoping period following the December 18, 2023, publication of the Notice of Intent (NOI) to Prepare an environmental impact statement in the *Federal Register* (Vol. 88, No. 241 Federal Register 87393) ended February 2, 2024. This report captures consistent and frequent comment themes found in the range of perspectives from written comments received but is not exhaustive of all written comments. More than 9,000 comments were received during the scoping period in addition to hundreds of reference materials for consideration.

This report was prepared to summarize the public comments received during the scoping period, identify themes and potential alternatives for developing the draft environmental impact statement, and identify other public concerns relevant to NWFP Amendment. The comments are divided by topics listed below and broken out by comment themes within each topic.

- Fire Resistance and Resilience
- Climate Change
- Mature and Old-Growth Ecosystems
- Tribal Inclusion and Indigenous Knowledge
- Communities
- Other Amendment Recommendations
- Alternatives
- Additional Scoping Period Comments

Fire Resistance and Resilience

The preliminary proposed action in the NOI indicated that the United States Department of Agriculture Forest Service seeks to amend the NWFP to improve fire resistance and resilience by clarifying direction for employing prescribed fire, managed fire use associated with natural ignitions, cultural burning, and active management. Comments that addressed fire resistance and resilience included the following themes.

- Theme 1 – Active management should be allowed across all land use designations and landscapes to improve fire resistance and resilience.
- Theme 2 – Federal timber management activities in mature and old-growth forest habitats increase fuel loading and decrease stand resilience.
- Theme 3 – Fire risk reduction needs to be concentrated in areas closest to homes.
- Theme 4 – Prescribed fire and cultural burning should be the preferred treatment in mature and old-growth forests.
- Theme 5 – The Forest Service should modernize its relationship with wildfire.

- Theme 6 – Standards and guidelines should be developed for fuel breaks and potential operational delineations.
- Theme 7 – Clear direction should be provided for post-fire salvage activities.

Climate Change

The preliminary proposed action in the NOI indicated that the Forest Service seeks to strengthen the capacity of ecosystems in the NWFP area to adapt to the ongoing effects of climate change and to mitigate the impacts of climate change. Comments that addressed climate change included the following themes.

- Theme 1 – The climate crisis is best addressed through additional conservation measures and the protection of all mature and old-growth forests on National Forest System lands.
- Theme 2 – The reserve network should be increased to advance climate change mitigation and resilience.
- Theme 3 – Sustainably managed and harvested forests improve carbon mitigation outcomes when compared to leaving forests alone.
- Theme 4 – The NWFP Amendment should analyze the use of regeneration harvest to meet the need for the continued existence of a mosaic of habitats across the landscape.
- Theme 5 – The NWFP Amendment should include a high-quality analysis of the carbon consequences of timber harvest.

Mature and Old-Growth Ecosystems

The preliminary proposed action in the NOI indicated that the Forest Service seeks to amend the NWFP and improve the sustainability of mature and old-growth ecosystems by providing plan direction to maintain and expand mature and old growth forest conditions and reduce loss risk across all land use allocations.

- Theme 1 – Maintain and strengthen existing NWFP requirements that address mature and old-growth ecosystems.
- Theme 2 – Retain all mature and old-growth forest wherever found.
- Theme 3 – The NWFP Amendment should discourage or eliminate commercial logging of mature forests.

Tribal Inclusion and Indigenous Knowledge

The preliminary proposed action described in the NOI indicated that the Forest Service seeks to strengthen the NWFP through the addition of plan direction that incorporates Indigenous Knowledge into planning and plan implementation, including future project design; identifies and supports Tribal goals; achieves forest management goals; and meets agency trust responsibilities.

- Theme 1 – The Forest Service should prioritize meaningful engagement and government-to-government consultation with affected Tribes in the NWFP area.
- Theme 2 – The NWFP Amendment should not be rushed and should include ample time to allow Tribes to meaningfully engage.

- Theme 3 – The NWFP Amendment process should provide capacity support (technical and funding) to allow Tribes to fully participate in the NWFP Amendment process.
- Theme 4 – The Forest Service should develop plan components that encourage cultural burning for treaty resource stewardship.
- Theme 5 – The current reserve system is not compatible with Tribal forest management.
- Theme 6 – The NWFP Amendment should focus on ecosystem function and related biodiversity, rather than the current species-driven approach.
- Theme 7 – The Forest Service should partner with Tribes to develop management goals and strategies related to co-management and co-stewardship.
- Theme 8 – Indigenous Knowledge should be combined with western science to achieve timber and non-timber objectives.

Communities

The proposed action described in the NOI indicated that the Forest Service seeks to amend the NWFP through the addition of plan direction that supports the long-term sustainability of communities, including those located near National Forest System lands and those that are culturally and economically connected to forest resources.

- Theme 1 – The NWFP Amendment should provide a reliable and predictable timber supply to support the region’s forest sector and local communities.
- Theme 2 – The restoration work needed to increase resilience to fire, and climate change requires an economically sustainable timber industry.
- Theme 3 – The Forest Service should support forest sector workforce development in local rural communities.
- Theme 4 – The NWFP Amendment needs to address shortfalls in the Probable Sale Quantity that have resulted in a backlog of timber that should have been offered.
- Theme 5 – The regional economy has changed over the last 30 years and rural communities are no longer dependent on the timber industry.
- Theme 6 – The NWFP Amendment should evaluate environmental justice concerns.

Other Amendment Recommendations

Commenters provided input regarding other amendment recommendations to be considered or incorporated into the NWFP Amendment, including the following themes:

- Theme 1 – Aquatic Resources and Riparian Areas
- Theme 2 – Recreation
- Theme 3 – Designated Areas and Special Uses
- Theme 4 – Wildlife and Habitat Connectivity
- Theme 6 – Land Use Allocations

Alternatives

Comments received included proposed alternatives or alternative components that the commenter requested the Forest Service evaluate as part of the NWFP Amendment process. The following themes were identified by comments that proposed specific alternatives. Other comments included proposals that could be part of an alternative.

- Theme 1 – The framework for alternative development should comply with applicable executive orders, agreements, and pledges.
- Theme 2 – The NWFP Amendment Environmental Impact Statement should evaluate a conservation alternative.
- Theme 3 – The Forest Service should “stay the course” with the NWFP.
- Theme 4 – The NWFP should incorporate standards and guidelines that provide different management strategies for frequent fire forests and westside forests.
- Theme 5 – The Forest Service should “scrap” the NWFP and convene a new, more representative workgroup to develop a new plan.

Additional Scoping Period Comments

Comments received on the public scoping process and requests for specific analysis and information included comments regarding the public scoping and overall amendment schedule, the NWFP Federal Advisory Committee, the scope of the amendment, public involvement and collaboration, and requests for specific analyses.

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Acronyms and Abbreviations

BLM	Bureau of Land Management
EIS	Environmental Impact Statement
ESA	Endangered Species Act
FAC	Federal Advisory Committee
LSR	Late Successional Reserves
NEPA	National Environmental Policy Act
NFS	National Forest System
NOGA	National Old Growth Amendment
NOI	Notice of Intent
NWFP	Northwest Forest Plan
POD	Potential operation delineation
PSQ	Probable Sale Quantity
USFS	U.S. Forest Service

Introduction

This report provides a summary of written public comments received for the Forest Plan Amendment for Planning and Management of Northwest Forests Within the Range of the Northern Spotted Owl (Northwest Forest Plan [NWFP] Amendment). The 45-day public comment scoping period following the December 18, 2023, publication of the Notice of Intent (NOI) to Prepare an Environmental Impact Statement (EIS) in the *Federal Register* (Vol. 88, No. 241 Federal Register 87393) ended February 2, 2024. This report captures consistent and frequent comment themes found in the range of perspectives from written comments received but is not exhaustive of all written comments. Please refer to the original letters located in the project reading room (<https://cara.fs2c.usda.gov/Public//ReadingRoom?Project=64745>) for additional written public comment detail.

The overall objectives of this report are to:

1. Aggregate and summarize public comment themes.
2. Identify themes and potential alternatives for developing the draft EIS.
3. Identify other public concerns relevant to NWFP Amendment.

The report addresses the five interrelated topic areas identified in the NOI (Items 2 to 6 below), followed by Other Amendment Recommendations, Alternatives, and Additional Scoping Period Comments, as follows:

1. Public Comment Overview
2. Fire Resistance and Resilience
3. Climate Change
4. Mature and Old-Growth Ecosystems
5. Tribal Inclusion and Indigenous Knowledge
6. Communities
7. Other Amendment Recommendations
8. Alternatives
9. Additional Scoping Period Comments

This report summarizes comments received from the public during scoping. It includes a number of different perspectives and arguments, and is intended to be a summary of what was said. Inclusion of a statement or perspective is not meant to imply that the United States Department of Agriculture Forest Service agrees with that statement or perspective.

Background

In December 2023, the Pacific Northwest and Pacific Southwest Regions of the Forest Service initiated an EIS process to evaluate the effects of amending the NWFP. This process is driven by increased understanding of biological and physical processes and the effects of management actions, which has resulted in the need for the Forest Service to adapt their management strategies to meet current and

future challenges. The preliminary need to change described in the NOI focused on five interrelated topic areas:

- Improving fire resistance and resilience across the NWFP planning area.
- Strengthening the capacity of NWFP ecosystems to adapt to the ongoing effects of climate change.
- 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.
- Incorporating Indigenous Knowledge into planning, project design, and implementation to achieve forest management goals and meet the agency's general trust responsibilities.
- 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 (NFS) lands and economically connected to forest resources.

Section 1 – Public Comment Overview

The Forest Service received more than 9,000 comments during the public comment scoping period that followed the December 18, 2023, publication of the NOI and ended on February 2, 2024. Comments were received from 3 federal agencies, 5 state agencies, several counties and other governmental organizations, several Tribes and Tribal organizations, several businesses, over 100 non-governmental organizations, and several thousand individuals. Most letters received from individuals were form letters, with approximately 400 unique letters from individuals.

Additionally, the Forest Service hosted four online webinars to inform the public about the NWFP Amendment and how to participate and comment. These webinars were held on between January 17 and January 25, 2024. Recordings of the meetings as well as the slideshow presentation are available online at: <https://www.fs.usda.gov/detail/r6/landmanagement/planning/?cid=fseprd1164267>.

Section 2 – Fire Resistance and Resilience

The preliminary proposed action in the NOI indicated that the Forest Service seeks to amend the NWFP to improve fire resistance and resilience by clarifying direction for employing prescribed fire, managed fire use associated with natural ignitions, cultural burning, and active management. As described in the NOI, this direction should reflect differences in dry and moist forested ecosystems, as well as ensure that forests are managed to adapt to changing fire regimes, restore fire in a functional role in the health and integrity of forest ecosystems, and contribute to traditional cultural resources. Comments that addressed fire resistance and resilience included the following themes.

Theme 1 – Active management should be allowed across all land use designations and landscapes to improve fire resistance and resilience.

Comments that supported this approach generally favored mechanical treatment and supported commercial and non-commercial timber management approaches. Related comments included:

- The NWFP Amendment should enable managers to implement mechanical thinning across a wide range of forest types to improve fire resiliency. Mechanical thinning must occur at a large scale prior to the introduction of prescribed fire.
- Any amendments made to the NWFP designed to improve the sustainability of mature and old growth forests should be focused on proactively addressing the risk for loss of these ecosystems to catastrophic wildfire through strategic, targeted, accelerated active forest management to reduce fuel loads.
- The Forest Service must reconsider, revise, or remove the 80-year age limitation on active forest management in Late Successional Reserves (LSRs) because this limitation hinders the agency's ability to effectively reduce stand densities and mitigate the risk of high-intensity and high-severity wildfire.
- The NWFP Amendment should encourage active management to restore and improve resiliency of LSRs in the West of the Cascades province.
- Timber management treatments should include regeneration harvest as well as commercial thinning.
- Active management should include all available tools, including thinning, timber harvest, fuel breaks, maintenance of safe transportation routes for firefighters, prescribed burning, improvements in the detection of wildfire starts, and aggressive suppression near and in at-risk landscapes.

Others commented that they do not support mechanical treatments to reduce wildfire risks and severity with some limiting this concern to LSRs and others extending it to the entire plan area. Other comments recommended that treatments designed to reduce fuel loads in mature and old-growth forests should avoid and minimize impacts to wildlife and focus on managing for ecological reasons and not simply to reduce wildfire risk. The same commenter recommended that thinning only be permitted in old growth forests when the goal is to restore a stand to its historic conditions and promote old growth conditions.

Theme 2 – Federal timber management activities in mature and old-growth forest habitats increase fuel loading and decrease stand resilience.

Other comments expressed concern that the Forest Service is using a wildfire crisis to reduce forest protection and increase logging, noting that logging has complex effects on wildfire risk and in many cases makes fires more destructive instead of less so. Comments also noted that although areas that have historically been logged have less fire resistance or resilience than more natural stands, with more problematic fuel loading and fire hazards, the Forest Service's thinning treatments have tended to prioritize natural stands because they have more commercial value.

Commenters also questioned the effectiveness of active management, with one comment describing how the canopy loss associated with commercial thinning over the past 25 years has resulted in a

dramatic increase in fuel loads and woody regeneration. Comments cite studies that suggest that thinning treatments followed by a large wildfire result in more cumulative mortality than stands that experience fire alone, noting that the same or similar studies have also questioned how effective commercial and manual thinning treatments are in reducing fire severity.

Comments were received that recommend that the NWFP Amendment focus on rebuilding public trust by emphasizing less controversial activities like plantation thinning and non-commercial fuel reduction. Careful thinning of plantations, they note, will meet the Forest Service goals of reducing fire risk, while also producing logs and making forests more resilient to climate change. Other comments noting that industrially logged landscapes have higher rates of high-severity fire recommend that fire risk reduction be concentrated in these areas.

Theme 3 – Fire risk reduction needs to be concentrated in areas closest to homes.

Commenters expressed support for changes to the NWFP that emphasize the need for wildland fire reduction activities near communities and the restoration of “characteristic fire activity in seasonally dry forest stands that are overstocked due to a history of fire suppression.” Comments also requested that the NWFP Amendment address the risk of cross-boundary fire impacts to adjacent properties, including reservation lands.

Other comments stated that past empirical evidence indicates that the chance of a fire hitting a stand that has been thinned is very low (less than 1 percent). Increasing the number of treated acres to improve this likelihood increases forest degradation, leading to some scientists calling for an increased focus on protecting homes and structures, rather than treating forests.

Comments in this theme category recommended that the NWFP Amendment should ensure compatibility with the Wildfire Crisis Strategy and target fuel reduction in and around communities, with one comment noting that Wildfire Crisis funding should be made available so that immediate work can begin on needed strategic treatments in their county.

Theme 4 – Prescribed fire and cultural burning should be the preferred treatment in mature and old-growth forests.

Comments were received that recommended that the NWFP prioritize the use of prescribed fire and cultural burning and included the following:

- Prescribed fire and cultural burning should be the preferred treatment in mature and old-growth forests where ecologically appropriate and no wood products of economic value removed.
- The Forest Service should develop plan components that encourage cultural burning for treaty resource stewardship, recognizing that prescribed burning for fuels and cultural burning are separate and distinct management approaches, with cultural burning often focusing on the benefits of first foods.
- The NWFP Amendment should include objectives and monitoring plan components that allow for an increase in the use of cultural fire, prescribed fire, and wildfire managed for resource objectives.

Other comments recommended that prescribed burning should be reintroduced and frequently used to “complete” treatments and restore ecological processes.

Theme 5 – The Forest Service should modernize its relationship with wildfire.

Comments were received that expressed concern about the current approach to wildfire, with commenters characterizing a current situation that largely approaches wildfire as a problem that can be controlled through vegetation treatments and firefighting, which has not proved successful. Identified elements for a revised approach include:

- Modifying fire suppression policies to give managers more discretion to let fires burn when weather conditions are appropriate so that fires can do their ecological work.
- Provide clear authority for fire managers to manage naturally ignited wildfires for resource objectives in appropriate ecological settings and incorporate strategic wildfire response planning such as potential operational delineations (PODs) to help inform fire management decisions.
- Amending all forest plans to allow more wildland fire use.
- Allow seasonal road closures and road obliteration to reduce unwanted human-caused ignitions, with camping and other facilities accessed via road closed during extreme fire weather.

Concern was also expressed that the NWFP Amendment is “motivated by a false sense of control over nature when in reality fuel reduction has a low probability of encountering fire and has a modest/marginal effect on fire behavior, and wildfires continue to burn with a characteristic mix of low, moderate, and severe effects.” Comments expressed that from an ecological perspective, it is questionable whether it is even desirable or necessary to reduce the frequency and intensity of fire and other disturbances away from human settlements and forests managed for sustained wood production. The same comments stated that even moderate to severe natural disturbances promote structural heterogeneity, create biological legacies and unique habitats, and can increase biodiversity.

According to commenters, accepting change with natural stewardship and exposure to natural disturbances and processes generally increases structural complexity, carbon storage, and tree species and other diversity. These accruing benefits, in turn, make forests more resistant and resilient to many future natural challenges and provide mitigation against climate change.

Theme 6 – Standards and guidelines should be developed for fuel breaks and PODs.

One of the comments that addressed this theme included a series of recommendations related to the use of fuel breaks and PODs, including the following:

- Use shaded fuel breaks rather than linear clearings.
- Focus fuel break treatments near roads.
- Focus on treating plantations and previously logged stands and avoid/minimize treating mature and old-growth forests, riparian areas, and roadless/unroaded areas.
- Use manual treatments (hand felling, lop-and-scatter, burning small piles) instead of heavy equipment in order to protect soils, water quality, and fire-resistant native plants.

- Retain dense, mid-to-high canopy to help maintain a cool, moist microclimate, retain fuel moisture, and help suppress the growth of surface and ladder fuels (which also minimizes maintenance costs).
- Retain deciduous hardwoods, which can serve as heat sinks during fires.
- Retain important elements of diversity where possible, such as Pacific yew, and some patches of shrubs that produce berries, nuts, nectar, etc. (food for wildlife), and to provide intermittent opportunities for wildlife crossing the road.
- Consider smaller PODs within the Wildland Urban Interface, and larger PODs further out.

Other comments urged the Forest Service to fully analyze the potential use of fuel breaks regardless of land use allocation or stand age with an overall objective of raising the canopy base height and reducing canopy closure.

Theme 7 – Clear direction should be provided for post-fire salvage activities.

Several comments recommended that the NWFP Amendment provide clear direction and specific guidelines for post-fire salvage activities, with some comments emphasizing that the Forest Service should use aggressive salvage harvest strategies when forests are affected by wildfire or increased rates of tree mortality. Comments expressed concern that current NWFP reserve designations limit options for post-fire fuels management, which they believe results in large amounts of dead wood on federal land that will eventually reburn at higher intensities. Another comment emphasized that salvage recovery should be prioritized for matrix areas, along roads and critical public access routes, and for public safety purposes.

Other comments highlighted the detrimental impact that post-fire salvage and pre-fire timber harvest has on mature and old-growth forests in matrix, LSR, and riparian reserve areas, noting that post-fire salvage activities have in practice included the removal of both live and dead trees, as well the construction and reconstruction of roads. Comments were also received that requested that salvage logging no longer be allowed.

Section 3 – Climate Change

The preliminary proposed action in the NOI indicated that the Forest Service seeks to strengthen the capacity of ecosystems in the NWFP area to adapt to the ongoing effects of climate change and to mitigate the impacts of climate change. Comments that addressed climate change included the following themes.

Theme 1 – The climate crisis is best addressed through additional conservation measures and the protection of all mature and old-growth forests on NFS lands.

Comments that recommended protection of all mature and old-growth forests stated that large trees in these forest habitats play an outsized role in both storing and accumulating atmospheric carbon. Commenters expressed concern that the Forest Service is seeking additional flexibility to circumvent existing NWFP restrictions on logging mature and old-growth forest, which the commenters believe will increase carbon emissions and exacerbate global climate change. Commenters stated that carbon emissions associated with commercial logging are more significant than those from natural disturbance processes, including wildfire, and further stated that commercial thinning also results in carbon losses. Comments also stated that the Forest Service should avoid narrowly defined climate

adaptation actions (such as density reduction with commercial log removal) that these commenters believe increase, rather than reduce, carbon emissions.

Commenters stated that climate change is a new and significant reason to conserve forests and reduce logging. Comments indicated that a science review will show that long-lived forests are a better place to store carbon than wood products, which are relatively short-lived. Commenters also stated that carbon cannot be moved from the forest to durable wood products without causing significant net greenhouse gas emissions. According to these commenters, the best approach is to retain medium and large trees, which store the most carbon and provide the greatest ecosystem services, and thin only small trees, the removal of which reduces climate stresses on the larger trees while emitting less carbon.

Commenters stated that a warmer world with more seasonal extremes of wet and dry also creates uncertainty about our ability to sustain older forests, and about whether we can recreate functional old forests starting from young, planted stands. Comments further stated that if climate change brings increasing frequency and severity of drought and natural disturbance, it may be harder to sustain existing older forests and harder to establish new forests and sustain them through long periods of forest succession required to reach habitat goals for imperiled species like northern spotted owls, marbled murrelet, and salmon; concluding that we should retain all the older forests that we currently have (and carefully nurture likely recruitment forests).

One commenter stated that climate uncertainty alone represents an increased risk for northern spotted owl recovery and that undisturbed ecosystems and late successional forests are more resistant and resilient to climate change.

Theme 2 – The reserve network should be increased to advance climate change mitigation and resilience.

Commenters suggested that the reserve system may need to be expanded to address climate change and resilience. Comments suggested that increasing the area of LSRs would help advance both climate change mitigation (maintain and increase carbon storage and reduce carbon emissions from logging) and climate change resilience (cool/moist refugia, greater redundancy attenuates the uncertainty related to climate change). Commenters also stated that protecting riparian reserves is especially important in light of global climate change, which is expected to increase stream temperatures and reduce fish habitat quality and quantity and suggested that continued protection of riparian reserves could potentially off-set future increases in water temperature related to global climate change.

Theme 3 – Sustainably managed and harvested forests improve carbon mitigation outcomes when compared to leaving forests alone.

One commenter advancing this perspective requested that the Forest Service review and consider recent publications that support this position and suggested that sustainable management “should be prioritized over antiquated reserve systems, such as wilderness, late-successional reserves, etc.,” further stating that “trees must be harvested to get net negative carbon outputs from forests.” A similar comment from another commenter stated that: “(a)ctive forest management through routine timber harvest coupled with the storage of harvested carbon in long-lasting wood products followed

by effective reforestation of harvested acres is one of the most effective ways to leverage our nation's forest resources to mitigate climate change.”

Theme 4 – The NWFP Amendment should analyze the use of regeneration harvest to meet the need for the continued existence of a mosaic of habitats across the landscape.

Comments identifying the need for regeneration harvest requested that the Forest Service analyze the creation of larger gaps (i.e., over 40 acres), along with heavy thinning, to create a varying mosaic of successional stages, and suggested that in changing climates it may be necessary to trade LSR for Matrix lands and vice versa.

Theme 5 – The NWFP Amendment should include a high-quality analysis of the carbon consequences of timber harvest.

Comments addressing the need for climate-related analyses included a request that the NWFP Amendment EIS conduct a new, comprehensive carbon and climate change analysis, rather than tier to the original analysis included in the 1994 NWFP Final Supplemental EIS, which they believe is outdated and based on flawed assumptions.

Section 4 – Mature and Old-Growth Ecosystems

The preliminary proposed action in the NOI indicated that the Forest Service seeks to amend the NWFP and improve the sustainability of mature and old-growth ecosystems by providing plan direction to maintain and expand mature and old growth forest conditions and reduce loss risk across all land use allocations.

Theme 1 – Maintain and strengthen existing NWFP requirements that address mature and old-growth ecosystems.

Commenters stated that while they understand the need for change, any changes should be aligned with the original mandates of the NWFP, which they believe remain necessary to protect and restore a functional interconnected mature and old-growth ecosystem, and not pose a barrier to active management necessary to meet agency goals. Commenters also note that the NWFP allows active management within every land allocation—even in reserves—but also includes standards to help ensure that logging is both necessary and effective in meeting goals for the reserves. Commenters stated that the following existing NWFP requirements need to be implemented, not weakened.

- The plan was designed to guide a 100- to 200-year forest recovery period. The plan's reserves were designed to be redundant and durable in the face of natural disturbance like wildfire.
- New developments, including climate change and changes related to barred owls, spotted owl dispersal habitat, and changed economic conditions, indicate a need to increase emphasis on conservation and restoration of more mature and old-growth forests, and reduced emphasis on Matrix objectives such as timber production from logging of mature and old-growth forests.
- The Forest Service planning team needs to carefully consider several new developments over the last 29 years that should inform any effort to update the NWFP. Most of these developments bring into question the need for and desirability of logging for timber volume in the matrix, and indicate the need for increased conservation and greater use of management tools other than logging.

Theme 2 – Retain all mature and old-growth forest wherever found.

Comments that addressed this theme include the following:

- Commenters wrote that there is “no longer a social license to log mature and old-growth forests” and that this is reflected in Executive Order 14072, issued on April 22, 2022, which declared a policy to conserve mature and old-growth forests on federal land and to manage forests to retain and enhance carbon storage. Comments recommended that the agencies should immediately implement these policies.
- Commenters also recommended that the Forest Service needs to make sure that this NWFP amendment process and decision is consistent with the national mature and old-growth plan amendment.
- Several comments recommended that the Forest Service should focus on treating plantations and previously logged stands and avoid/minimize treating mature and old-growth, riparian areas, and roadless/unroaded areas.

Theme 3 – The NWFP Amendment should discourage or eliminate commercial logging of mature forests.

Commenters recommended that the NWFP Amendment National Environmental Policy Act (NEPA) analysis evaluate how the commercial logging of mature forests impacts their potential development into healthy old growth conditions and provided a number of examples.

- Commenters stated that established late-successional forests are more than just big trees and include large dead trees, down wood, and multiple canopy layers. Comments stated that the successful restoration of complex old forests requires a reliable flow of material from the live-tree pool into the snag and down-wood pool, which is interrupted by logging.
- Commenters stated that the agencies continue to rely on scientifically outdated methods that perpetuate the deficit of large snags and down wood and continue to remove medium-sized trees that should be allowed to continue to grow and become ecologically valuable snags and dead wood.
- Commenters stated that studies indicate that heavy thinning of maturing forest can delay attainment of snag objectives, and, as a result, commercial thinning may be preventing or delaying development of essential features of old forest ecosystems important to both terrestrial and aquatic species.
- Commenters suggested that the Plan Amendment NEPA analysis must account for the trade-offs caused by logging within all forest types.
- Commenters indicated that in moist provinces, mature forests just need time, not logging., and that the Plan Amendment NEPA analysis must account for the beneficial role of natural processes.
- Commenters stated that the original authors of the NWFP considered a range of information and determined that 80 years is an appropriate place to draw the line between younger forests likely to benefit from careful thinning and older forests that are likely to experience net negative effects, and that there is no new science to change that conclusion. The same

commenters argued that new information developed since 1994 shows that dead wood is more valuable than previously thought.

Section 5 – Tribal Inclusion and Indigenous Knowledge

The preliminary proposed action described in the NOI indicated that the Forest Service seeks to strengthen the NWFP through the addition of plan direction that incorporates Indigenous Knowledge into planning and plan implementation, including future project design; identifies and supports Tribal goals; achieves forest management goals; and meets agency trust responsibilities.

Theme 1 – The Forest Service should prioritize meaningful engagement and government-to-government consultation with affected Tribes in the NWFP area.

Comments that addressed government-to-government consultation included a request that the Forest Service at a minimum initiate individual government-to-government processes with each Tribe affected by the NWFP. Several Tribes requested that the Forest Service initiate government-to-government consultation with their Tribe and/or include their Tribe as a cooperating agency, with at least one Tribe requesting government-to-government consultation check-ins throughout the NWFP Amendment process.

Commenters stated that meaningful engagement and individual consultation is needed to ensure that the NWFP Amendment does not impede current or future consultation, co-management, or co-stewardship activities with Tribes in the NWFP area, recognizing that affected Tribes have different traditions and approaches to forest planning.

One commenter suggested that more meaningful Tribal inclusion could be provided via two related plan components: 1) Tribal Co-Management Conditions, which would consist of specific resources and/or geographies that Tribes would co-manage; and 1) an Ethical Space process that could be used to enter into memorandums of understanding between Tribes and individual national forests, and provide guidance for Tribal Co-Management Conditions and co-management opportunities across all national forests.

Theme 2 – The NWFP Amendment should not be rushed and should include ample time to allow Tribes to meaningfully engage.

Tribes and others commenting on the need for adequate Tribal consultation expressed concern with the current NWFP Amendment schedule, which they believe does not include adequate time for the necessary consultation processes. Reasonable timeframes are needed for Tribes to conduct meaningful analyses, recognizing that cultural distinctions and traditions specific to Tribes require longer timeframes to ensure collective review and respect for traditional processes.

With more than 80 federally recognized Tribes in the NWFP area, comments noted that there is “no way the Forest Service can adequately conduct meaningful engagement, let alone government-to-government consultation.” Another commenter stated that the Forest Service’s own definition and approach to Trust Responsibility requires that the agency should be working directly with Tribes from pre-NEPA to implementation to monitoring, meaning that the Forest Service should have engaged with Tribes prior to issuing the NOI. The same comment notes that each Tribal Nation is unique and within each federally recognized Tribe, there may be many bands and Tribes with their own unique culture.

Comments noted that many Tribes do not have sufficient resources and capacity in their programs to allow meaningful engagement and need to hire additional staff to properly engage, which takes time and requires proper funding. One comment submitted on behalf of northwest Tribes requested that the Forest Service allow sufficient time for Tribal consultation on any proposed amendments prior to the release of the Draft EIS. Others commented that the Forest Service should actively and repeatedly solicit input from Tribes during the EIS alternative-development process.

Some Tribes indicated that there are issues of trust, “where some Tribes may be reluctant to share cultural and traditional resource information with the Forest Service out of fear that this information may be shared inappropriately, or outright ignored.” The Forest Service, they note, should continue to engage with Tribes to build trust and ensure that the amendment is done correctly, which will take time.

Theme 3 – The NWFP Amendment process should provide capacity support (technical and funding) to allow Tribes to fully participate in the NWFP Amendment process.

Commenters, including several Tribes, requested that the Forest Service provide technical and funding support to allow Tribes to fully participate in the amendment process. Where needed, resources should be invested to allow Tribal representatives to attend meetings and participate in other activities related to development of the Draft EIS. Meaningful engagement, consultation, and co-development of planning, commenters note, takes time and resources.

Theme 4 – The Forest Service should develop plan components that encourage cultural burning for treaty resource stewardship.

As noted in Section 2 – Fire Resistance and Resilience, above, comments requested that the Forest Service develop plan components that encourage cultural burning for treaty resource stewardship, recognizing that prescribed burning for fuels and cultural burning are separate and distinct management approaches, with cultural burning often focusing on the benefits of first foods. Cultural fire, comments note, “often involves intergenerational participation, ceremony, focus on particular plant and animal species, and may involve elements that are not appropriate for non-Indigenous people to participate in.” One commenter recommended that the NWFP Amendment remove permitting requirements and provide funding mechanisms to support Indigenous cultural fire on each national forest in the NWFP area.

Comments described how indigenous people have engaged in cultural burning for millennia for a wide variety of reasons, including the production of materials for arrows and baskets, to stimulate growth of preferred foods, to create deer and elk habitat for hunting, and to protect villages from wildfire. Other comments stated that cultural burning promotes biodiverse habitats and creates critical shade fire breaks across the landscape.

One Tribal organization recommended that the Forest Service develop an Indigenous Task Force to prioritize and incentivize “Indigenous leadership in cultural burning and habitat restoration at scale and frequency to restore ecologically characteristic fire activity in fire-prone areas.”

Another Tribal organization commented that traditional and cultural burning practices require appropriate forest conditions and stated that significant active treatment and stand density reduction will be needed before Tribes can safely reintroduce fire.

Theme 5 – The current reserve system is not compatible with Tribal forest management.

Comments from several Tribes requested that the NWFP Amendment should recognize the limitations of the current reserve system, which is not consistent with Tribal forest management practices or Indigenous Knowledge, which allow or require management flexibility in all management areas. Prescriptive components of the NWFP, “such as those limiting opening sizes and preventing selective harvest within stands over 80 years of age,” constrain the management flexibility needed for an adaptive stewardship process. Tribal comments were received that recommended that the NWFP Amendment incorporate an adaptive management process that provides the “adaptive capacity and tools required for real-time decision making and action around habitat restoration and climate resilience.”

One Tribe commented that the lack of early successional forest in LSRs reduces biodiversity and negatively impacts deer and elk by reducing available forage, which can in turn lead to reduced carrying capacity and decreases in Tribal hunting capacity and first foods availability.

Theme 6 – The NWFP Amendment should focus on ecosystem function and related biodiversity, rather than the current species-driven approach.

Several Tribes commented on the limitations of single species management, which they note “has not been effective as evidenced by the significant loss of old growth forests to wildfire,” and encouraged the Forest Service to consider species other than the northern spotted owl, as well as values that are significant to Tribes.

Theme 7 – The Forest Service should partner with Tribes to develop management goals and strategies related to co-management and co-stewardship.

Comments supported the Forest Service partnering with Tribes to develop co-management and co-stewardship goals and strategies, informed by Indigenous Knowledge, access to cultural and religious sites, cultural burning, indigenous hunting and gathering, and other issues of interest to Tribes, including promoting culturally significant species, supporting Tribal conservation practices, and supporting work conducted by Tribal restoration crews.

One comment recommended that the NWFP Amendment direct each National Forest in the NWFP area to work with local Tribes to establish agreements, including Master Stewardship Agreements, that allow Tribes to lead management and stewardship projects.

One comment recommended that Tribes share responsibility with the Regional Foresters as the final decision makers for the NWFP Amendment, with involvement during all levels of the process.

Theme 8 – Indigenous Knowledge should be combined with western science to achieve timber and non-timber objectives.

Comments expressed support for Tribal inclusion and co-stewardship to incorporate Indigenous Knowledge with western science. Comments recommended that indigenous knowledge be integrated throughout the NWFP and when applicable, included in scientific enquiry and validated using scientific data. Others highlighted the need to respect Tribal knowledge and data sovereignty, ensuring that Tribes have control over what Tribal knowledge is shared and how.

One Tribal organization recommended that the NWFP Amendment incentivize Indigenous-led leadership to develop standards and guidelines that prioritize native plants for Indigenous food

systems and management goals, priorities, and conservation strategies informed by Indigenous Knowledge. The same organization recommended that the Forest Service develop an Indigenous Task Force to safeguard and secure Tribal rights, including, among others, the following:

- Indigenous Knowledge through Indigenous Data Sovereignty Agreements.
- The free exercise of customary laws, rules, and cultural protocols established by Indigenous People.
- The retention and intergenerational transmission of ancestral languages and Indigenous Knowledge.
- The practice of cultural traditions and prioritization of Indigenous access to hunting, fishing, and gathering on national forests.

The commenter also recommended that the NWFP Amendment support local communities by creating watershed restoration workforces that integrate Indigenous Knowledge and provide economic opportunities for smaller, local firms; promoting sustainable processing of restoration by-products; supporting culturally appropriate, sustainable recreation opportunities; and other measures of mutual benefit to Tribal Nations, Indigenous people, the federal government, and local communities.

Section 6 – Communities

The proposed action described in the NOI indicated that the Forest Service seeks to amend the NWFP through the addition of plan direction that supports the long-term sustainability of communities, including those located near NFS lands and those that are culturally and economically connected to forest resources. In addition to the following themes, commenters also addressed wildfire risk in the vicinity of communities. This concern is addressed above in Section 2 – Fire Resistance and Resilience, Theme 3.

Theme 1 – The NWFP Amendment should provide a reliable and predictable timber supply to support the region’s forest sector and local communities.

Comments were received that requested that the NWFP Amendment improve the predictability of the supply of timber from national forests and ensure that local communities benefit from active forest management. Comments stated that this is needed to meet the plan’s original intent to support local economies and community well-being. More broadly, comments requested that the Forest Service strive to alleviate the harm the NWFP has caused rural communities by “allowing the use of timber harvest management strategies and opening the forest back up to commercial use.”

Comments described how the decrease in timber harvest over the life of the NWFP has affected rural communities, resulting in job loss, loss of business and public services, high poverty levels, and loss of tax revenues and school funding.

Others commented that there is no statutory requirement to provide “predictable” supplies of timber from Federal forestlands and recommended that this type of requirement not be part of the NWFP Amendment.

Theme 2 – The restoration work needed to increase resilience to fire and climate change requires an economically sustainable timber industry.

Comments addressing the timber industry and local communities included the observation that an economically sustainable timber industry is needed to provide and support the workforce and infrastructure needed to help the Forest Service implement forest restoration activities. Commenters stated that the existing regional forest products infrastructure is supply-constrained and in danger of additional closures despite increased public demand for wood products. Commenters were concerned that the NWFP area already lacks adequate timber infrastructure, which makes the economics of forest restoration challenging. They contend that a predictable supply of federal timber is needed for the timber industry to be sustainable and continue to operate over time. Comments also stated that the funding needed to implement large-scale landscape restoration is dependent on the revenues generated through the sale of timber.

Other comments were concerned that restoration treatments that involve commercial harvest are ineffective and may actively contribute to the problems they are trying to address.

Theme 3 – The Forest Service should support forest sector workforce development in local rural communities.

Commenters requested that the Forest Service support forest sector workforce development through increased work opportunities, provide flexibility for operators to use new and innovative tools and equipment, and provide harvest opportunities that are both economically viable and operationally feasible. Others suggested that the NWFP Amendment include mechanisms to encourage each national forest to cultivate relationships with local communities, prioritize the use of local contractors, develop workforce development programs to support qualified and skilled local workforces, and help ensure money spent on local harvests and treatments benefits nearby communities. Others requested that the NWFP also include a requirement that Forest Service employees be required to be based in the communities in which they work.

Theme 4 – The NWFP Amendment needs to address shortfalls in the Probable Sale Quantity that have resulted in a backlog of timber that should have been offered.

Comments addressing the Probable Sale Quantity (PSQ) requested that the NWFP Amendment include a plan to make up this backlog over time as well as increase timber harvest elsewhere. The commenter notes that the Forest Service has failed to meet an anticipated annual PSQ of 1.1 billion board feet, resulting in a backlog of more than 10 billion board feet of timber that needs to be made available.

Other comments addressing the PSQ state that it should be reduced or eliminated, with timber sustainably managed along with other multiple use objectives.

Theme 5 – The regional economy has changed over the last 30 years and rural communities are no longer dependent on the timber industry.

Comments recommended that the NWFP Amendment recognize that the regional economy has diversified and grown in recent years. Commenters noted that well-protected public forests directly and indirectly contribute to our quality of life and serve as a foundation for regional economic development that exceeds the value of logs produced for the timber industry. A number of comments observed that mature and old growth forests are worth more standing than logged. Comments also

stated that the ecosystem services provided by forest conservation, including clean water, biodiversity, watershed protection, climate stabilization, fire moderation, and quality of life, should be recognized as economic benefits with values that exceed those of logging.

Comments noted that recreation and tourism are growing sectors of the regional economy, employ substantially more people than the timber industry, and represent an important opportunity for northwest forests to support long-term community stability. Non-timber resources and values, including recreation activities like hiking, camping, hunting, fishing, and wildlife viewing, contribute to economic stability at the local and regional levels. Comments recommend that the Forest Service recognize the importance of recreation as a way to enhance local economies, with several comments noting that rural communities with a recreation focus are generally vibrant and thriving.

In addition to recreation and tourism, commenters recommended that the NWFP Amendment emphasize development of a restoration economy that is independent of commercial timber harvest on NFS lands. Elements of a restoration economy identified by commenters include workers employed for fire treatments, invasive species removal, general restoration, tree planting, and trail building.

Theme 6 – The NWFP Amendment should evaluate environmental justice concerns.

Comments concerned with environmental justice requested that the Forest Service consider and incorporate the Forest Service’s Guidance, “Equity Action Plan,” into the Draft EIS and account for smoke sensitive communities. Other comments requested that the Draft EIS consider the environmental justice impacts of the proposed action, recognizing that poor forest health and its effects disproportionately affect rural, poor, minority, Tribal, and low-income residents. One Tribal commenter recommended that the Forest Service help redress this balance by investing in making restoration jobs more available to Tribal contractors.

Section 7 – Other Amendment Recommendations

Commenters provided input regarding other amendment recommendations to be considered or incorporated into the NWFP Amendment, including the following themes:

Theme 1 – Aquatic Resources and Riparian Areas

Comments were received that recommended that aquatic resources be considered one of the major need-for-change topics and be included as a key issue in the NWFP Amendment. Commenters recommended that the NWFP Amendment retain the Aquatic Conservation Strategy and the existing approach to riparian reserves, with some arguing that the Aquatic Conservation Strategy should be strengthened, and riparian reserves and key watersheds expanded. Comments stated that high quality riparian and aquatic resources will increase landscape resilience to climate change and wildfires. Commenters also recommended that all extractive uses, including logging and livestock grazing, be removed from riparian reserves.

Commenters stated that riparian reserves are intended to protect numerous species that do not live in streams; rather, they live in the stream-side forest extending hundreds of feet from the stream. These species still require a relatively cool-moist microclimate, complex forest structure, and abundant wood, and will continue to be adversely affected by logging adjacent to any narrower riparian

reserves. As a result, commenters recommend that the Forest Service recognize the full rationale for the Aquatic Conservation Strategy.

Comments included a request that the NWFP Amendment considers creating a new decision-making framework that enhances riparian protections while responding to the need to reduce wildfire risk, with all riparian zones managed to accommodate beneficial fish and wildlife habitat needs. The same commenter also recommended that the Forest Service prioritize restoring stream-adjacent road networks in riparian reserve to historic stand densities. Others commenting requested that the NWFP Amendment establish clear standards and guidelines for reducing road density to 1-2 miles/square mile and hydrologically separating road networks from aquatic ecosystems.

Riparian-related comments also included a request that the Forest Service review the riparian reserve buffers implemented by the Bureau of Land Management (BLM) in western Oregon through its Resource Management Plan and consider adopting the same approach for the NWFP Amendment. Other comments request that the Forest Service mitigate for the reduced conservation that has resulted from the BLM effectively cutting riparian reserves in half, noting that wide riparian reserves established by the NWFP were supposed to serve multiple purposes, including as northern spotted owl dispersal habitat.

Theme 2 – Recreation

Comments were received that recommended that recreation be included as a key issue in the NWFP Amendment. Comments included a request that the NWFP Amendment provide for consistent landscape-level management direction for sustainable recreation in the plan region. One commenter recommended that the Forest Service consider a series of recreation plan components from the 2023 Forest Plan Revisions for the Sierra and Sequoia National Forests for incorporation into the NWFP Amendment. The comment also suggested that plan components could emphasize application of the Interagency Visitor Use Management Framework and clearly define conditions to be achieved or maintained, identify management strategies to achieve or maintain desired conditions, and implement management strategies and actions.

Comments also suggested that the NWFP Amendment integrate recreation into climate resilience strategies and also address the resilience of recreation infrastructure to climate change and other stressors. Suggested ways for the NWFP Amendment to incorporate recreation with respect to climate mitigation and adaptation include the following:

- Expeditiously restore recreation sites and reopen them to the public after climate-related events.
- Update policies for constructing and siting new recreation infrastructure to account for predicted climate impacts.
- Target climate resilience strategies, including aquatic restoration, hazardous fuels treatments, and carbon forestry, in areas that contain high recreational values. These activities should be designed, sited, and prioritized in a way that benefits the quality of the recreation experience in a particular area.

One comment requested that the NWFP Amendment consider establishing a Pacific Crest Trail Management Area throughout the NWFP area to ensure consistent management of the Pacific Crest Trail and surrounding area.

Other comments requested that emphasis be placed on motorized access and off-highway vehicle use, with comments advocating for more areas to be open to off-highway vehicle use, with a specific recommendation that all Maintenance Level 1 roads be opened for off-highway vehicle use. Other comments requested that more limits be placed on motorized access and use. Recognizing the potential for recreation use to impact fish and wildlife and their habitats, comments also recommended that recreational access and opportunities be carefully planned in cooperation with local states and Tribes to minimize impacts to fish and wildlife. Potential measures could include reducing road densities and seasonal access closures. Comments also recommended that outdoor recreation be incorporated into forest restoration projects and wildfire planning.

Theme 3 – Designated Areas and Special Uses

Comments were received that requested that the NWFP Amendment evaluate the potential to designate additional areas for protection, including Botanical Special Interest Areas, Areas of Critical Environmental Concern, Research Natural Areas, and Other Special Interest Areas. Others recommended that all Inventoried Roadless Areas and other unroaded areas be reviewed for potential Wilderness designation.

Comments were received that requested that the NWFP Amendment maintain existing utility access and related vegetation management on and off rights-of-way. Commenters recommended that the NWFP Amendment modernize the way National Forests manage utility lines and focus on easing requirements for utility maintenance and development, rather than additional restrictive land use designations. Other related comments requested that the NWFP Amendment:

- Recognize the major economic benefits that powerlines provide to communities.
- Consider expanding rights-of-way for public utilities to allow additional vegetation management and reduce the risk of wildfire.
- Evaluate the risk that the application of new standards and guidelines could increase the prevalence of danger trees near utility lines and the associated ignition and reliability risks.
- Evaluate the risk of prescribed burns near utility lines, and related standards and guidelines should require coordination with utilities with nearby utility corridors.

Theme 4 – Wildlife and Habitat Connectivity

Comments were received that made specific reference to wildlife species other than the northern spotted owl, including Survey and Manage species and suggestions to either expand Survey and Manage species or replace them with species of conservation concern, and efforts to increase habitat to better address wildlife values under the proposed Amendment.

Survey and Manage Species: Comments suggested the proposed Amendment maintain and continue to build on the Survey and Manage program by ensuring updated monitoring of rare species status, as well as increase the number of sensitive species monitored. Disjunct, rare, and endemic species should be prioritized for protection under Survey and Manage protocol and additional protective measures should be considered to address the needs of these species.

Commenters argued that Survey and Manage is necessary in addressing the biodiversity crisis and should be maintained in the NWFP Amendment. In addition, comments stated that additional species should also be added to the list, which should be updated annually for each National Forest and focused on species that live in forests outside the range of the northern spotted owl.

Species of Conservation Concern should be addressed in the proposed amendment when species will be adversely affected by increased active management in reserves to address overall ecosystem services and biodiversity.

Increasing wildlife habitat and connectivity: New or expanded existing Research Natural Areas, Botanical Areas, and Special Interest Areas should capture high quality representations of common native ecosystems and unique habitats with rare or threatened species, or unroaded areas between 1,500 and 5,000 acres in size. In addition, commenters suggested that the LSR network should encompass all Inventoried Roadless Areas and/or Inventoried Roadless Areas should be reviewed for expansion and recommended for Wilderness designation.

Theme 6 – Land Use Allocations

Comments received that made specific reference to existing and proposed land use allocations included the following:

Late Successional Reserves: Comments were received with respect to LSRs with some commenters noting that LSRs have not proven adequate for conservation of species that depend on mature and old growth conditions and should be strengthened and expanded through additional habitat protections. Comments included requests that LSRs be expanded to protect all older forests currently in the Matrix.

Other comments addressing LSR management included:

- Additional plan components should be considered to restore the function of plantations in LSRs in moist forests, including active management.
- Restoration actions may be required in LSRs in drier forest types.
- Adaptive and place-based management approaches should be used to allow work in LSRs, rather than variances.
- Comments included a request that the 80-year age limitation on active forest management in LSRs should be removed because it hinders the Forest Service’s ability to effectively reduce stand densities and mitigate wildfire risk. Other comments stated that this limitation should remain in-place in moist forests and modifications for dry forests, if needed, should be project-specific and evaluated on a case-by-case basis.
- New and reconstructed roads should be limited in LSRs to meet Aquatic Conservation Strategy goals. Once forest stands approach 80 years of age, specific plans for road removal must be part of any vegetation management action.

Matrix: Comments were received that recommended that the Forest Service formally classify Matrix lands as a land use allocation, clarify management objectives and standards and guidelines for the Matrix land use allocation that actively encourage (rather than just allow) timber harvest, and change the name from Matrix lands to Harvest Land Base. The commenter noted that the name change would

be consistent with a corresponding change made by BLM in their 2016 Resource Management Plans and recommended that the Forest Service consider adopting the corresponding Harvest Land Base design system and standards and guidelines. Another commenter implied that the NWFP Amendment was not consistent with the sustained yield provisions of the Multiple Use-Sustained Yield Act and recommended that the Matrix land base be dedicated to sustained yield timber production.

Riparian Reserves: Comments related to riparian reserves included requests that the NWFP Amendment modify riparian reserve buffers based on best available science and update guidance to allow restorative treatments in riparian reserves, particularly drier riparian reserves. Others commented that prescribed fire and other active management strategies should not be used or introduced into riparian areas and requested that there be no change to the management of riparian reserves.

Adaptive Management Areas: Comments recommended that Adaptive Management Area designations be expanded and enhanced with stronger regulation and more consistent implementation to ensure that land managers can effectively use these land allocations to further our understanding of forest ecosystems. Another recommended that the NWFP Amendment either restore the intent of Adaptive Management Areas (which they feel have been managed as just another component of the LSR system) or reallocate these areas to new or existing land use allocations.

Forest Landscape Conditions: One commenter stated that there are essentially two approaches for amending the NWFP: 1) revise the boundaries and/or standards and guidelines of existing land use allocations; or 2) emphasize the identification of Forest Landscape Conditions based on certain characteristics, such as successional stage, origin, risk of disturbance, characteristic disturbance patterns, and opportunities for co-management. Based on the purpose and need in the NOI, the commenter identified at least six different Forest Landscape Conditions: Community Protection Zones, Tribal Management Areas, Dry Forests, Old Forests, Timber Harvest Stands, and Critical Infrastructure.

New or Revised Land Use Allocations: One commenter recommended that unique habitats such as meadow, deciduous oak woodland, and oak savanna should have a separate management allocation that focuses on their characteristics and contributions to diversity and does not require that management actions in these habitats go through mature/old-growth conifer screens.

Another comment recommended that the Forest Service consider a new land use allocations for the Okanogan-Wenatchee National Forest and the Mt. Adams District of the Gifford Pinchot National Forest, which is consistent with the current forest restoration direction in place at the Forest Plan level for the Okanogan-Wenatchee National Forest.

Section 8 – Alternatives

Comments received included proposed alternatives or alternative components that the commenter requested the Forest Service evaluate as part of the NWFP Amendment process. The following themes were identified by comments that proposed specific alternatives. Other comments included proposals that could be part of an alternative, some of which are noted elsewhere in this summary.

Theme 1 – The framework for alternative development should comply with applicable executive orders, agreements, and pledges.

Comments indicated that the framework for alternative development should include compliance with:

- Executive Order 14072 on the conservation of mature and old-growth forests.
- Executive Order 14008, which requires that 30 percent of the nation’s lands and waters be protected by 2030.
- The Paris Climate Agreement emphasis on maintaining carbon sinks and reservoirs.
- The Glasgow Forest Pledge (signed by President Biden) to end deforestation and forest degradation.

Theme 2 – The NWFP Amendment EIS should evaluate a conservation alternative.

Commenters recommended that the NWFP Amendment EIS evaluate a conservation alternative that includes protection of all remaining mature and old-growth forests and expansion of the existing reserve network by both adding area to existing reserve areas and creating new ones. Several organizations identified core issues that should be part of a conservation alternative, including the following:

- Protect all remaining mature and old-growth forests from logging and protect and expand the existing reserve network.
- Prioritize fire-risk reduction treatments in areas near homes and in flammable young tree plantations where fire risks are highest. Mature and old-growth forest areas should be the lowest priority for treatment because they function as fire and climate refugia and tend to burn in lower fire severities.
- Focus treatments in mature and old-growth forests on prescribed and cultural burning. Large tree removal is not necessary prior to burning.
- Increase natural wildland fire use under safe conditions. Close and obliterate roads to reduce unwanted ignitions in high-risk areas.
- Manage for in-forest carbon storage and sequestration.
- Expand the restoration objectives of the Aquatic Conservation Strategy by increasing road closures and obliteration and continuing logging restrictions to at least two-tree heights in riparian reserve; designating beavers as a keystone species of conservation concern; removing livestock near water bodies; expanding culvert repair and enlargement; and prohibiting post-salvage logging.
- Continue and build upon the survey and manage program by ensuring updated monitoring and incorporation of habitat into the reserve network. Adopt species of conservation concern with an emphasis on those with limited dispersal sensitivity to management impacts and climate change.
- Increase Tribal government involvement in management decisions that affect their ancestral territory.

- Avoid and minimize any take, as defined in the Endangered Species Act (ESA), of ESA-listed species, as well as state-listed species in the NWFP area.

Theme 3 – The Forest Service should “stay the course” with the NWFP.

Others commented that the Forest Service should “stay the course” with the NWFP and retain and enhance where necessary the core components, including the following:

- Maintain the NWFP as an ecosystem-based plan that supports biodiversity in all its dimensions, contributes to recovery of ESA-listed species, maintains viability of wildlife populations, avoids the need for additional listings, and mitigates for more intensive management of non-federal lands.
- Maintain the robust combination of course and fine filters for biodiversity conservation.
- Protect a robust network of LSRs, with clear and enforceable limits on logging, recognizing that the reserve system may need to be expanded due to the presence of barred owls occupying suitable habitat that is no longer available for northern spotted owls and climate change mitigation and resilience needs.
- Retain the Aquatic Conservation Strategy including a well-protected network of key watersheds and riparian reserves.
- Re-establish a robust Survey and Manage program.
- Maintain a science-based, ecosystem-centered natural disturbance/fire policy that is tolerant of characteristic natural processes that are essential for the development and maintenance of late-successional and old-growth forest ecosystems.

Theme 4 – The NWFP should incorporate standards and guidelines that provide different management strategies for frequent fire forests and westside forests.

Other comments requested that the NWFP Amendment develop standards and guidelines that recognize that frequent-fire forests and westside forests require different management strategies.

Other alternative components identified include:

- Manage riparian reserve in dry, frequent-fire forests to better reflect the disturbance ecology of the ecosystem. Assess the potential for outer riparian buffers in dry forests to contribute to risk reduction and landscape restoration goals; allow active management with an emphasis on contributing to riparian health.
- Provide post-fire management guidelines that clarify the allowable types of post-fire management and recovery action, including vegetation management, for all land use allocations.
- Integrate the results of the Climate Vulnerability Assessments that have recently been completed for each National Forest in Region 6 into the development of alternatives.
- Develop and identify carbon storage strategies that recognize that the appropriate strategy is different in frequent-fire forests than in forests with less frequent fire return intervals. Elements of a climate adaptation strategy should include the restoration and reorganization of Region 6 seed production capacity.

Theme 5 – The Forest Service should “scrap” the NWFP and convene a new, more representative workgroup to develop a new plan.

One commenter requested that the NWFP be removed and no longer allowed to be in effect, while a new workgroup comprised of representatives from all user groups (including off-road vehicle advocates) is convened to develop a new plan that could be implemented at some point in the future.

Section 9 – Additional Scoping Period Comments

Comments received on the public scoping process and requests for specific analysis and information included the following:

Theme 1 – Scoping Process Comments

Comments were received that addressed aspects of the scoping process including the following:

Schedule: Comments expressed concern that the 45-day public scoping period was not long enough to allow full consideration of supporting documents and preparation of meaningful comments. Others were concerned that the preliminary schedule laid out in the NOI is not feasible, especially when considering the requirements for consultation with the U.S. Fish and Wildlife Service and National Oceanic and Atmospheric Administration Fisheries, represents a rushed and abbreviated planning process to reach predetermined outcomes, and does not allow time to consult with Tribes or meet the Forest Service’s stated intention to incorporate more Indigenous Knowledge as part of the planning process. Commenters recommended that the Forest Service extend the timeline and “take the time to do it right.”

Federal Advisory Committee: Comments were also received with respect to the NWFP Federal Advisory Committee (FAC) and included a concern that the committee lacked specific technical expertise related to wildlife and aquatic species, carbon accounting and life cycle analysis, and reserve design, among other things. Another comment stated that the FAC is incomplete and does not include parties with “experience implementing management and stewardship practices that work.” Concern was also expressed that all user groups should be involved in preparing the amendment, not a hand-picked group of individuals.

Concern was also expressed that the FAC process is being rushed and the NEPA process appears to be proceeding without any input from the FAC. Comments recommended that the FAC be allowed to reach consensus before the Forest Service proposes and analyzes amendments to the NWFP.

Scope of the Amendment: Concern was expressed that the NWFP is working, and the proposed amendment will undermine that success. Commenters also stated that the NOI fails to explain how the existing NWFP prevents the agency from meeting its goals.

Comments were received regarding the forests included in the proposed amendment and include some confusion about whether the Modoc and Lassen National Forests in California are part of the NWFP area. Another comment questioned the need to include forests outside of the range of the northern spotted owl, specifically the eastern portions of the Deschutes and Fremont-Winema National Forests and stated that including these areas would likely require a plan revision, rather than an amendment.

Other scope-related comments included a concern that the scope is too narrow, with too many issues being left out (identified examples included recreation, grazing, sagebrush, ponderosa pine, and juniper ecosystems, aquatic ecosystems, salmonid habitat, and covered species) and a request that the Forest Service reconsider and initiate an NWFP revision, rather than an amendment.

Commenters also suggested that the amendment process should include amendments or revisions to the underlying forest plans (a “bottom-up strategy”) and questioned the relationship between the proposed NWFP Amendment and the separate ongoing National Old Growth Amendment (NOGA). Comments expressed concern that the proposed amendment fails to comply with Executive Orders 14072 and 14008 and will be inconsistent with NOGA. Others suggested that the parallel timelines shared by the NWFP Amendment and NOGA offer an opportunity to streamline and limit overlapping policy direction to make project planning and implementation more efficient and reduce potential confusion.

Public Involvement/Collaboration: Comments related to public involvement and collaboration included comments that emphasized the need for the NWFP Amendment to involve meaningful engagement with Tribes to meet federal treaty and trust responsibilities (as discussed in Section 5 – Tribal Inclusion and Indigenous Knowledge, above). Comments regarding public involvement and collaboration also included a request for the inclusion of a mechanism for meaningful engagement with the forest sector (loggers, forest contractors, and other stakeholders), a request that the Forest Service directly engage/consult with the owners of cabins on NFS lands, and a recognition that collaboration and public-private partnerships can help mobilize resources, expertise, and investment.

Comments more broadly stated that NWFP-related processes tend to be dominated by federal agencies and requested that the Forest Service work to include Tribes, states, and rural communities in NWFP interpretation and implementation. Three commenters requested they be officially recognized as cooperating agencies in the NWFP amendment process.

Theme 2 – Requests for NEPA Analysis and Additional Information

Commenters argued that the NEPA analysis must recognize the interconnected nature of any land management scheme, especially an ecosystem plan like the NWFP. For instance, conservation of riparian reserves and key watersheds enhances conservation of terrestrial wildlife; conservation of Late Successional Reserves enhances conservation of riparian and aquatic habitat; and “increasing efforts to control fire and reduce fuels will *unavoidably* reduce habitat (implicating the reserve system),” increase carbon emissions (exacerbating climate change), and increase watershed disturbance (implicating the Aquatic Conservation Strategy). The agency must disclose and consider the effects of proposed changes on the plan as a whole and all its parts.

A number of commenters suggested other specific analysis requests including:

1. The NEPA analysis must answer whether the northern spotted owl (and other late successional wildlife) is threatened more by wildfire alone, or by the combined effects of fuel reduction logging, plus wildfire. They contend that due to the unpredictability of wildfire and the ephemeral benefits of fuel reduction, the answer is that “fuel reduction logging of mature forest to save it from wildfire will not result in net benefits to the spotted owl or other late successional species.” Any fuel

reduction must be focused outside mature and old-growth habitat, which brings into question several elements of the need for change identified in the Notice of Intent.

In review of the NOI, commenters stated that it appears that the Forest Service intends to allow more logging and other management in reserve areas, and strongly urge the agency to develop species-specific plan components to ensure the recovery of northern spotted owls, marbled murrelets, and other listed species, as well as develop such components for potential species of conservation concern (species not listed under the ESA but for which viability concerns exist). See 36 Code of Federal Regulations 219.9(b) and (c); see also 36 Code of Federal Regulations 219.13(b)(6).

2. Commenters suggested that the Plan Amendment must conduct a quantitative analysis of carbon storage and how it is affected by management, citing that the National Forests Management Act planning regulations instruct the Forest Service to manage for carbon storage as an ecosystem service. In addition, they stated that the EIS must address the social cost of carbon dioxide emissions, per Biden Executive Order on Protecting Public Health and the Environment and Restoring Science to Tackle the Climate Crisis, January 20, 2021.
3. Some comments stated that the NEPA analysis must consider the fact that reserves on BLM lands are no longer protected as part of the interagency reserve strategy, and therefore additional mitigations must be adopted on Forest Service lands to retain options for the conservation of the northern spotted owl, marbled murrelet, and Coho salmon. Specifically, comments stated that:
 - The northern spotted owl cumulative effects analysis in the 1994 Supplemental EIS is no longer valid and must be reconsidered at the regional scale.
 - With increased logging now occurring on Western Oregon BLM lands, both in the Harvest Land Base and reserves, “events and conditions” have changed considerably since Judge Dwyer found the NWFP lawful. Any increased logging authorized on National Forest System lands through the proposed amendment risks further running afoul of Judge Dwyer’s warning and the Forest Service’s statutory obligations.
4. Commenters presented evidence that wildfire and beetle-drought severities are not increasing and requested that the Forest Service conduct a statistically robust analysis of mature and old growth recruitment vs loss over extended periods of monitoring, including confidence intervals around any observed trends; and argued that to do otherwise is not statistically valid nor best available science. Visual graphs are not statistically valid—or evidence based—in themselves.
5. Commenters stated that logging contributes to the dangerous feedback with extreme fire weather and believe that any assumptions about temporary carbon losses from “active management” that offset natural disturbances would require detailed carbon life cycle analysis and independent verification. Commenters also requested that a life cycle analysis of carbon leaving the forest from logging in the NWFP be conducted and verified independently (i.e., published in the peer-reviewed literature).
6. One comment suggested that the Forest Service should review high severity fire analysis for the NWFP “Dry” versus “Wet” ecoprovinces and LSRs versus other land use categories. Using the assumption that mature and old-growth recruitment in the LSRs at least keeps pace with mature

and old-growth losses from natural disturbances like high-severity fire, then long-term mature and old-growth stability or expansion is likely given that the LSRs were designed to handle such disturbances via built-in redundancy and distribution patterns of the reserve network. The commenter noted that the NWFP assumed a decadal gross loss of late seral forests to natural disturbances and harvest of five percent.

7. Commenters requested that the amendment include a mature and old growth patch size and distribution fragmentation/footprint analysis region-by-region.
8. Commenters suggested that the Forest Service disclose the number of acres of non-commercial fuel reduction and prescribed fire approved in the past 15 years, but not fully implemented, nation-wide. A number in acres must be provided as part of a valid NEPA analysis and the agency must disclose and consider the previous lack of follow-through surrounding non-commercial implementation. Without this analysis and this public disclosure, all Forest Service decisions considering the full implementation of non-commercial treatments are faulty, unsupported by recent evidence and invalid.