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## Friends of Douglas-Fir National Monument

# Dispatch

*Protect the Best, Restore the Rest*

[www.douglasfirnationalmonument.org](http://www.douglasfirnationalmonument.org)

*January, 2025*

### **Prez says:**

By Milo Mecham, President



This edition of the Dispatch concentrates on the Forest Service's proposed amendments to the Northwest Forest Plan. There is a short history, if needed, and an overview of the amendments, which is much shorter than the 240-page draft environmental impact statement (plus six volumes of appendices). There are also some conclusions about the advantages and disadvantages of all the proposed amendments.

Two things that I did not say in the discussion that I can include here. One is that when the Forest Service acknowledges that its alternatives are dominated by assumptions that more forest management (logging) is the solution to the problems it wants to deal with, I thought of the saying that, "when you own a hammer, everything looks like a nail."

The Forest Service acknowledges that changing the age of mature forests subject to "treatment" (logging) will, in the short term harm the endangered species it wants to protect, but in the long term it will benefit the species. John Maynard Keynes said that, "in the long run we are all dead." There is no long run if the owls, the murrelets or other endangered species don't survive the short run.

The other offering is a draft of a comment that will be sent in by the Friends. The comment period runs until March 17, 2025. Commenting is important. The Forest Service counts and reads all the comments it receives. Form letters are counted, but perhaps given less weight than an original letter. Feel free to cut and paste from our draft to make your own. It is our conclusion that the best course to drop the process, stick with the current rules and make focused changes as necessary within the current NWFP.

The recommended form is to start with an introduction of yourself and your interest, then make comments specific to your concerns.

You can submit [Comments Online](#). This opens a form that asks identifying information, then gives you a space to type or paste.

Or mail your comments to:

Comments on proposed NWFP amendment

R6 - Pacific Northwest Region All Units

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## History

What follows is a brief history of how we got to the proposal to amend the Northwest Forest Plan. If you don't need it, skip to the analysis.

The area of the NWFP covers the Coast Range in Oregon, Washington and California (except the redwood forest), the Cascades in Oregon and Washington, and some areas east of the Cascades in Oregon and especially Washington where the spotted owl may have lived. The Northwest Forest Plan (NWFP) was created in 1994 as an attempt to solve the problem of the decline of imperiled species, especially the northern spotted owl, which was being adversely affected by logging of the limited supplies of remaining mature and old growth forests. Also receiving lots of attention were the marbled murrelet (a seabird that nests in old-growth forests far inland) and various stocks of Pacific salmonid species.

The method of protection chosen was to create several categories of land use designations. The most important designations were the Late Successional Reserves (LSR), the Riparian Reserves (RR) and the Matrix areas

(wilderness areas are not included in any of these). These types were treated somewhat differently depending on whether the forests were west of the Cascades (considered wet forests) or east of the Cascades, or otherwise dry forests where fires were more frequent. The size of the LSR and Matrix designated areas is roughly equal within the area of the proposed Douglas-Fir National Monument.

In a recent report, twenty-three percent of identified old-growth land in the Pacific Northwest was within reserved land. Reserve lands include Late Successional Reserves and Riparian Reserves, as well as other, smaller areas of reserves. Another recent Forest Service report indicated about 9 million acres of mature Douglas-fir forest, and about 3.4 million acres of old-growth Douglas-fir forest.

The NWFP and other Forest Service rules recognized that old-growth forests (also sometimes called late-seral forests) had a lot of important characteristics, including snags and earlier seral characteristics, but for implementation purposes old-growth came to be defined as trees or stands over 200 years old. Mature forests, for the implementation purposes of the NWFP, were stands with trees over 80 years old. In the original NWFP, logging was to be limited in the wet LSR to thinning stands of less than 80 years old (most all were monoculture plantations of Douglas-fir established after clearcutting), to facilitate the future development of mature and old-growth forests. Logging was also limited in the Riparian Reserves to protect water quality and habitat, especially to facilitate salmon and steelhead recovery. Logging was to be allowed in the Matrix areas, with only a few exceptions where large areas of old-growth existed.

Originally, the Forest Service projected that old-growth and mature forests under the NWFP would decline for a while, but then gradually increase so that after 50 years or more, the old-growth and mature forests would recover to pre-logging levels. A survey of the NWFP area after 25 years found that the loss of old-growth and mature forests was happening faster than planned. Logging caused part of this loss, but the biggest loss came from wildfires. Within the existing old-growth and mature forests, the goals of diversity and connectivity had been met only a very little. The Forest Service, and the Bureau of Land Management, started on the amendment process of the NWFP. The Forest Service has developed these proposed amendments as a part of the process. It is not clear now where the BLM is on its process.





A mixed-age forest

## Comments

The Forest Service has proposed amending the Northwest Forest Plan (NWFP). This is a brief view of the proposed amendments. For some of the abbreviations, see the History.

The purpose behind the Forest Service actions was to update NWFP components “to improve wildfire resistance and resilience, adapt to expected future climate conditions, improve ecological conditions related to old-growth forests, expand tribal inclusion, and support local economies.” As is common in Environmental Impact Statements (EIS) the proposed amendments propose four alternatives. Alternative A is the no action option, which means no amendments to the NWFP. The other alternatives, B, C and D, propose different approaches to management of the forests, all designed to achieve the goals listed above.

The major differences between the alternatives, is the degree to which “forest management” is increased throughout the NWFP area. “Forest management” is another way of saying “logging”. For the most part, this is not what used to be common -that is, clear cutting– but involves some creation of meadows (clear cutting) and various levels of thinning that leaves some trees standing.

The key differences among the alternatives are the thresholds beyond which the stands or individual trees are to be conserved in the LSR andMatrix areas (No significant change for RR areas).

| Area      | Alt A (no change) | Alt B     | Alt C    | Alt D     |
|-----------|-------------------|-----------|----------|-----------|
| Moist LSR | 80 Years          | 120 years | 80 years | 120 years |

|              |                                |   |                                |  |
|--------------|--------------------------------|---|--------------------------------|--|
| Moist Matrix | “Large” area over 80 years old | Mature is before 1905, old-growth before 1825 | “Large” area over 80 years old | Mature is before 1905, old-growth before 1825                            |
| Dry LSR      | 80 years, depending on risk    | Trees older than 150 years                    | 80 years, depending on risk    | Trees 150 + years (mature)<br>Trees established before 1850 (old growth) |
| Dry Matrix   | “Large” area over 80 years old | Trees established before 1850                 | “Large” area over 80 years old | Stands established by 1850   |

The idea of Alternatives B and D is that, by raising the age of the threshold for conservation in the LSR areas, more activity (logging) would allow more fire control and a quicker movement toward the development of old growth conditions. The effect of Alternatives B and D on Matrix land is, essentially, stricter limits on forest management by establishing a threshold, but increasing the age of the threshold.

Another set of differences among the alternatives comes in terms of where salvage logging is allowed after fires or insect damage. Alternatives B and D allow more salvage logging than the existing NWFP (alternative A), alternative C allows less even than the existing NWFP. In the Forest Service view, salvage logging is a specific type of the larger category of forest management.

The basic question in terms of evaluating the differences among the alternatives is whether you believe that the Forest Service can manage its way out of the problems created by climate change, decades of active fire suppression, increased wildfires and past logging practices.

The Forest Service is quite clear that the major differences among the alternatives is the amount of management (logging) allowed in the alternatives. In my own interpretation Alternative A is status quo, Alternative B is more forest management, Alternative C is less forest management, and Alternative D is even more forest management.

One impact of alternatives B and D is the formal extension of protections to the Matrix areas. Under current conditions, unless there are large areas of over 80 year-old trees, there are no restrictions on the kind of treatment that can be applied. Under Alternatives B and D, stands established before 1905 (mature stands), treatment is limited to treatments that “maintain and restore ecosystem integrity, reduce wildfire risk to communities and infrastructure” and meet tribal cultural use priorities. In the same Matrix areas there can be no treatment of stands established before 1825, except for tribal concessions and to reduce fire danger to communities at risk. Whether or not this is a good thing depends on your expectations for the future.

Currently, the de facto protection for wet Matrix stands can best be described as the same 80 year-old threshold for LSR areas. This is because the generally accepted scientific evidence suggests that at about 80 years old a stand of trees on the moist side of the Cascades begins to be satisfactory environment for spotted owls and other protected species, although they need real old-growth to thrive. Thus, no matter the terms of the NWFP, it is

possible that litigation will maintain the same protections as for the LSR. It is also possible that, because the amendments to the NWFP are done with the intent of improving environmental conditions for protected species, the amendments could be taken as a change to the de facto protected age of the forest.

There are several important issues here. One relates to the effectiveness of treatment designed to preserve endangered species. Another (2) relates to the changed protections of old-growth and mature forests. Another relates (3) to the value of forest management for fire safety and, finally (4) the impact of the amendments on local communities.

1. In its discussion of the changed conditions created by the implementation of alternatives B and D, the Forest Service acknowledges that the allowed management activities will have a temporary adverse effect on the habitat and potentially the numbers of protected species. The rationale for these projected “takings” is that, long term, the environment will be improved. There is no discussion of whether the endangered or threatened species will survive long enough to benefit from the improved conditions.
2. Generally, mature forests are to be managed only in ways that can allow them to move towards old growth forests. Under alternatives B and D, the initial protected age moves up to 120 years. Even worse, mature and old growth forests in the Matrix area are defined, not by age, but by a date. This would mean that there will never be any increase in the amount of either mature or old growth stands in Matrix areas, no matter how long the NWFP lasts.
3. All the discussion of the need for fire-reduction treatments near communities in the NWFP area is based on several assumptions. First, that protection of local communities located next to Forest Service land is the (sole) responsibility of the Forest Service. (There is no discussion of the importance of fire hardened structures.) Second, there is the assumption that treatment (logging) is likely to be effective, even though observation suggests that large scale wildfires travel across treated areas, including clearcuts, with no regard to the type of treatment. And third, that single episode treatment plans do not actually decrease fire danger because they increase understory fuel loads.
4. One of the stated criteria for evaluating the amendments to the NWFP is improving economic activity within the NWFP area. The study acknowledges that the Forest Service lands contribute little to the economies around the Forests. The most important contribution is from recreational activities. Logging and timber industry activities are third in employment contribution. The report also acknowledges that mills have changed and there are few or no mills that could handle the larger trees that might be cut under the new rules. Despite these limitations, the Forest Service looks only at timber jobs, and assumes that all conditions will come out positively to add at most a few thousand jobs across the whole NWFP area. No consideration is given to the possibility that preservation of more mature forests will enhance recreational use.

Addressing climate change is one of the stated purposes of the proposed amendments. The analysis discusses the fact that there is far more carbon stored in mature and old growth trees, but the carbon accumulation is faster in younger trees. The analysis of the proposed amendments acknowledges that it does not offer any conclusions concerning how the amendments will affect the climate crisis, but assumes that it will have a positive impact. There is no discussion of the scientific findings that logging and timber operations have a negative impact on the carbon stored in the forest, even counting the stored carbon of replanted trees.

## **Conclusions**

There are some good points to all of the alternatives, especially if you can accept the Forest Service’s assumptions that more management is best, and that the proposed management schemes will work out for the best for the forests and the threatened and endangered species. Because experience has led us to distrust the assumptions, especially when the process will be finished by a new administration, it is our conclusion that the best choice is to end the process without selecting any alternatives. As the letter says, this is a better choice than selecting Alternative A, because it should allow more freedom to make local changes to implement the best alternatives for a particular area.





A mossy old forest near Breitenbush

**To the Forest Service:**

Re: R6 - Pacific Northwest Region All Units Comments Project 64745

The Friends of Douglas-Fir National Monument is a non-profit organization dedicated to the creation of a National Monument recognizing the scientific and cultural importance of the Douglas-fir ecosystem in the Oregon Cascades. The proposed amendments to the Northwest Forest Plan (NWFP) can have a significant impact on the Friend's goals; therefore the Friends have reviewed the proposed alternatives to an amended NWFP and offer these responses.

In general, the Friends of Douglas-Fir National Monument echo the concerns that led to the analysis of proposed amendments to the NWFP. The goal of responding to the apparent failures to improve the conditions relevant to the protections of the threatened and endangered species native to the northwest forests while enhancing community protections and tribal involvement, are worthwhile. The NWFP originally sought to protect the relevant endangered and threatened species by limiting the harvesting of some mature and old-growth forests and encouraging the development of mature and old-growth stands. The analysis of the NWFP provided as a part of the amendment process shows that the current NWFP has not succeeded. The proposed alternatives, unfortunately, also do not achieve the desired results. It is the Friends conclusion and recommendation that instead of completing the process and adopting any of the alternatives, including Alternative A, the Forest Service take the same action it has just announced with regard to the National Old Growth Amendment, that is: to end the process without further action.

The areas of mature and old-growth stands protected by the NWFP were originally projected to remain about the same and then gradually increase. The analysis of northwest forests included in the discussion of the



proposed amendments acknowledges that, especially in recent years, the area of mature and old-growth stands has declined. What is not overtly mentioned, but can be gathered from other scientific discussions, is that the populations of the relevant threatened and endangered species have also declined significantly.

The review by the Friends of Douglas-Fir National Monument of the alternatives set forth in the released draft EIS leads us to the conclusion that none of the proposed options, as they are presented, are likely to achieve the goals set forth by the Forest Service. The best course is to drop the process and allow individual Districts to make local implementation decisions consistent with the intent of the NWFP, and in light of the deficiencies brought to light by the analysis of the NWFP and the comments submitted in the process thus far.

It is a positive step toward addressing the failures of the original NWFP to recognize that the segregation of some areas into the Matrix category has not been productive. Reaffirming and thus strengthening these limitations, as in Alternatives A and C, will not solve the problems. And, unfortunately, the protections extended by Alternatives B and D do not solve the problems. By choosing the specific dates of 1905 and 1825 the Forest Service would freeze the maximum extent of mature and old-growth forests and prevent any increase in the extent of mature and old-growth stands. The fixed dates rather than an age limit will mean that the actual extent of mature and old-growth stands will disappear overtime as the inevitable, even if limited, loss from fires and insect damage occurs.

It is also inappropriate, that is, contrary to the goal of protecting threatened and endangered species, to increase the treatment threshold from 80 to 120 years in LSR areas. The treatment of these older areas is supposed to hasten the development of late-successional forest conditions. This may, in the long run, result in an increase in the protected species. The problem with this proposed change is that the increased treatment of viable habitat will, as acknowledged, result in the short-term loss of the environment for and, potentially, in the number of, protected species. Given that the number of protected species has declined under the current treatment regime, it is dangerous to assume that these protected species have time to wait to see if the long-run benefits of the proposed changed threshold will succeed.

Given the discussion of the possibility of increased jobs in the logging and timber industries under Alternatives B and D, and the real possibility of an adverse effect of increased treatment regimes, it is apparent that these alternatives are favored because of their assumed positive impacts on local communities. A careful examination of the facts on the ground suggests that these alleged effects are illusory.

Discussion in the analysis of the proposed amendments acknowledges that the largest source of jobs and income in adjacent communities is recreation, yet there is no discussion of the potential negative impact of increased forest management, or the potential of enhanced recreational employment to be found in undisturbed maturing and old-growth forests. The discussion of Alternatives B and D assumes a small increase in employment from increased forest management, including from harvesting larger trees, even though the discussion admits that employment in the logging and timber industry has steadily declined due to automation and the change in mills. The assumption that new mills will be created to handle a marginal increase in large logs is not supported by any evidence and is contradicted by the discussion in the EIS.

Mature and old-growth forests resist the spread of fire more successfully than do forests subjected to any type of forest management, especially occasional thinning that encourages the growth of fuel loaded understory growth, or annual controlled burns necessary to control the understory fuel load. In many, if not most situations, improved protection of local communities can best be achieved by local discussion and analysis, taking into account the extensive evidence that community protection is best achieved by structural hardening and ongoing maintenance of near-structure clearings.

Ending the process of examining amendments without taking any action, including any seeming reaffirmation of the NWFP through the election of Alternative A, is the best course of action. This will allow individual Districts to make appropriate practical decisions in light of the weaknesses of the NWFP, and in light of the failures of all the alternatives. There will be more freedom for the Districts to act if the shortcomings of the NWFP are acknowledged but no further action is taken at the National level that would lock the Districts into



any general course of action, including the re-establishment of the NWFP. Such actions as increasing tribal involvement, appropriate protections for mature and old-growth Matrix forests, and other ways to address the shortcomings of the current NWFP can be taken through local actions where such action can be shown to further the purposes of the NWFP and relevant laws.

In sum, it is the recommendation and request of the Friends of Douglas-Fir National Monument, that, in light of the inability of any of the proposed alternatives to address the problems of the NWFP, and the internal defects of the Alternatives, the process of considering general system-wide amendments to the NWFP be ended without further action.

Thank you for the opportunity to comment on the proposed amendments.

Very truly yours,  
Friends of Douglas-Fir National Monument  
By Milo Mecham, President

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