



Initial Analysis of Northwest Forest Plan Amendment Draft Environmental Impact Statement Alternatives

Background on the Northwest Forest Plan

In the decades after World War II, the Pacific Northwest’s iconic forests were ravaged by industrial logging at a massive scale. By the 1980s, this epidemic of old-growth clearcutting had reached a frenzy on public lands, leading to multiple federal Endangered Species Act (ESA) listings for coho salmon and other wildlife as well as a massive public backlash. President Bill Clinton brought federal land management agencies together in the 1990s to address the problem and try to reform how the U.S. Forest Service and Bureau of Land Management (BLM) managed publicly-owned forests.

President Clinton directed these agencies to adopt a conservation strategy known as the 1994 Northwest Forest Plan (NWFP). The NWFP required agencies to shift their focus from logging the last remaining stands of mature and old-growth (80+ year old) forests to seeking to recover more older forest habitat. This first-of-its-kind ecosystem recovery plan became a world-wide model for habitat and wildlife protection, and it has succeeded in reversing the decline of mature and old-growth forests in the Pacific Northwest. These recovering forests have been a lifeline for imperiled fish and wildlife, safeguarded clean water, and provided an enormous unforeseen benefit for the climate by pulling vast amounts of carbon dioxide from the atmosphere and safely storing it in their trunks, roots, and forest soils.

Unfortunately, ever since its adoption, the NWFP’s focus on recovering mature and old-growth forest habitat has been bitterly opposed by logging interests and by some in the agencies themselves. After years of pressure from the logging industry, in 2016 the BLM revised its management plans to give itself more “management flexibility” by removing all of its 2.6 million acres of Western Oregon forest lands from the NWFP. As a result, the BLM has shifted back to aggressive logging aimed at maximizing timber production (including controversial mature and old-growth logging sales).

Now the Forest Service has proposed its own sweeping changes to the NWFP that could double—and potentially triple—logging levels on our national forests and re-open mature and old-growth stands to aggressive logging.



NWFP Amendment Alternatives Considered

The NWFP Amendment Draft Environmental Impact Statement (DEIS) released by the Forest Service in November of 2024 considers four alternatives:

- **Alternative A:** No Action – retains current Northwest Forest Plan protections
- **Alternative B:** Proposed Action – redefines “mature” and “old-growth,” eliminates protections for unlogged mature forests in LSRs, increases clearcutting of mature and old-growth forests in Matrix lands, and increases logging in dry forests that will degrade habitat, emit greenhouse gases, and potentially increase fire hazard
- **Alternative C:** More emphasis on natural processes, including wildland fire, while still increasing logging through loosened protections in LSRs and new definitions for mature and old growth
- **Alternative D:** Even greater flexibility and “predictability of timber outputs” than Alternative B, and would *eliminate rare species survey requirements before logging* in certain areas

All three action alternatives (Alternatives B, C, and D) would weaken existing protections and increase logging on our national forests to varying degrees.

Tribal Inclusion

All three action alternatives (Alternatives B, C, and D) include components regarding tribal inclusion that the original NWFP did not address. For example, under Alternative B (the Proposed Action), each national forest would aim to implement at least three projects in collaboration with Tribes within five years, and annually implement projects that support culturally significant species such as camas, beargrass, and hazel. The Forest Service would also consult with interested and relevant Tribes annually on huckleberry restoration actions.

Alternative D, meanwhile, would place even greater emphasis on coordination with Tribes to integrate Indigenous Knowledge, support traditional practices, improve access, and determine annual restoration actions of First Foods and culturally significant botanical species. Under all action alternatives, the Forest Service would pursue such restoration actions through co-stewardship agreements if possible.

These tribal inclusion components, if meaningfully implemented in proper consultation with Tribes, warrant consideration and potential adoption separate from the conservation rollbacks and increased commercial logging described below.



Analysis of Forest Management Changes under Alternative B (Forest Service’s Proposed Action)

Late-Successional Reserves

- Forest stands would now be considered “young” even if they are 120 years old—a major change from the previous NWFP definition of “mature” stands as 80 years old.
- Logging would now be allowed in moist “young” stands up to 120 years old in LSRs (previously restricted to stands up to 80 years old). This would open up **824,000 acres** to logging—the equivalent of nearly eight Mt. Jefferson Wilderness areas.
- Rather than continue to prohibit logging activities in moist LSRs unless they restore or accelerate late-successional or old-growth conditions to benefit ESA-listed species, new exceptions would be added to allow logging to “restore habitat for other species that depend upon younger stands” and to “achieve other desired conditions,” **all but eliminating the core purpose of LSRs.**
- Salvage logging would be allowed in moist LSRs in certain situations, including “along existing system roads”—essentially converting burned old-growth areas into sterile tree farms.

Matrix Lands

- In moist Matrix lands, there would be no genuine restrictions on logging in stands established after 1905 (up to 120 years old), and the Forest Service would aim to log **81,000 acres a decade “to bolster timber production”** – that’s 1.3 times the size of the Salmon-Huckleberry Wilderness area.
- In moist Matrix stands established between 1825 and 1905 (up to 200 years old), logging would be allowed for multiple reasons at the Forest Service’s discretion, including a broad exception for “reducing the risk of fire.”
- This shift away from stand age considerations to stand establishment dates essentially means these old stands **will never age into protection**, severely limiting if not outright curtailing recruitment of additional old growth—especially when combined with new logging loopholes in LSRs.

Dry Forests

- The Forest Service aims to log **at least one third** of dry forest stands across all land use allocations (LSRs and Matrix) over 15 years—**964,000 acres**—almost as many acres as the entire Umpqua National Forest.
- Despite providing these acreage figures, the DEIS fails to provide any maps delineating where dry forests exist within the planning area, leaving undefined discretion to local managers directed to meet timber quotas.
- Within dry stands, trees older than 150 years receive nominal protection from logging, but the Forest Service includes broad exceptions for “restoration” and “to reduce wildfire risk.”



Doubling Logging from 2023 Levels

- According to the DEIS, the Forest Service logged approximately 504 million board feet of timber from the 17 National Forests within the NWFP area in 2023. Under Alternatives B and D, the Forest Service aims to log over twice that amount annually, **over one billion board feet.**
- Notably, the original average annual timber output estimate from the NWFP (1.1 billion board feet) included the 2.6 million acres of Western Oregon BLM lands that typically produce ~200 million board feet but are *no longer part* of the NWFP. The Forest Service now proposes to log much *more* on *less* public lands, meaning the adverse impacts will be even more concentrated.
- In total, the Forest Service aims to “treat” 2.65 million acres per decade across all land use allocations—the equivalent of two and a half Mt. Hood National Forests—with all the attendant adverse impacts from associated road-building and heavy machinery use.

Lack of Species Protections

- The amendment process has already faced criticism for failing to adhere to the core biodiversity conservation purpose of the Northwest Forest Plan. And now, despite rolling back habitat protections and ramping up logging, the DEIS alarmingly asserts the proposed amendment would not substantially lessen protections for species—the original purpose of the NWFP—and **does not include species-specific plan components to ensure ESA-listed species’ recovery or other native species’ viability** throughout the planning area.