



**File Code:** 1940  
**Date:** March 4, 2024

Dear Friends and Neighbors:

The Umpqua National Forest (UNF) is updating its monitoring program to incorporate recent direction from the USDA-Forest Service Washington Office to streamline monitoring reports for better public engagement.

A change to the monitoring program made outside the plan revision or amendment processes can be accomplished with the administrative change process (36 CFR 219.13(c)). Changing a monitoring question or an indicator is considered a substantive change to the monitoring program (FSH 1909.12,32.4) and may be made only after notice to the public of the intended change and consideration of public comment. This letter is to notify you of the proposed changes and to provide you with the opportunity to comment on these proposed changes. Instructions about how to comment on these changes are provided below.

#### ***Proposed Administrative Change***

Per direction of the USDA-Forest Service Washington Office, we have streamlined our 2021-2022 Biennial Monitoring and Evaluation Report (BMER). The BMER is 25 pages under four themes and includes 20 monitoring questions. This BMER answers 15 of these monitoring questions and addresses them through 26 indicators. This is posted with, and can be compared to, all previous Monitoring and Evaluation Reports on the UNF website under “Land and Resource Management/Planning – “Monitoring Reports” at [Umpqua National Forest - Planning \(usda.gov\)](http://Umpqua National Forest - Planning (usda.gov))

Our monitoring plan covers topics required under the 2012 Planning Rule (FSH 1909.12), plus social, economic, and cultural sustainability, to create a more concise and compelling report for the public. Findings are presented in Table 1 of the BMER to ease interpretation of whether the Forest was meeting Forest Plan monitoring objectives, or if changes to the Forest Plan are warranted (BMER pg. 5).

A brief explanation of the changes to the monitoring program, as compared to the 2016 Monitoring Report and Program Transition Letter, are as follows.

**Eliminated Questions:** Based on specialist review of the questions in the context of 2021-2022 data and priorities, we propose eliminating three monitoring questions. A brief explanation of these changes follows:

i.4. Are management practices causing changes in stream flows? Current management practices are developed to have minimal effect on stream flows; research in the South Umpqua Experimental Forest showed that even clearcutting had a transient effect in increasing flows. Streamflow data are important for understanding aquatic ecosystem functions, but we cannot use



them to measure the impact of management because of the greater influences of drought, precipitation, and vegetation changes in both managed and unmanaged areas.

ii.4 Are projects contributing to the persistence of Survey and Manage species? Because the Survey and Manage program in the Pacific Northwest currently supports surveys only in advance of treatments, we can only assess whether we found these species in project areas and buffered them out of the treatments. We cannot determine from the existing program whether the species are persisting in the treated areas, nor how any treatment impacts affect the persistence of the species outside these project areas.

vii.3 How ecologically sustainable is the level of timber harvest on the forest? We do not have a quantitative baseline against which to measure the ecological sustainability of timber harvest. Sustainability is not a set volume of wood; it depends on which trees are removed from each specific environment. Projects are designed to maintain or improve ecosystem function at the stand or watershed scale, but this does not translate into a single metric; it affects the other ecosystem metrics addressed in the BMER.

**Added or Changed questions:** Based on specialist review, we have combined eight questions in the 2016 Monitoring Report and Program Transition Letter that had redundant indicators and data sources to result in four questions.

**Question viii.1 now includes question ii.2.:** Updated viii.1. Are management activities being implemented so that they do not substantially and permanently impair the productive capacity of the land while meeting Forest goals for soil conditions, erosion, and nutrient cycling? The incorporated Question ii.2. stated: Are management actions effective in meeting Forest goals for soil conditions, erosion, and nutrient cycling?

**Question ii.3 now includes question iv.2:** Updated ii.3. Are National Forest management activities contributing to the maintenance or improvement of aquatic habitat or habitat complexity in streams, rivers, and lakes? The incorporated Question iv.2. stated: Are management actions effective in maintaining or enhancing aquatic habitat complexity?

**Question iii.2 now includes question iv.3:** Updated iii.2. What is the trend for mature and late successional habitat needed for pileated woodpecker and Northern spotted owl persistence? The incorporated Question iv.3. stated: What is the trend for mature and late successional habitat needed for Northern spotted owl persistence?

**Question iv.1 now includes question iii.4:** Updated iv.1. Are National Forest management actions maintaining or improving focal fish species populations and Threatened and Endangered Subpopulations? (This question was deferred and not answered in the 2023 BMER.)

**New questions:** Two new questions were added to the BMER since the 2016 Monitoring Report and Program Transition Letter to address known stressors under the 36 CFR 219.12 topic 6, “Measurable changes on the plan area related to climate change and other stressors that might be affecting the plan area.”

vi.1. Are areas managed for old growth or late seral conditions maintaining late seral characteristics?

vi.2. Are patterns of wildfire consistent with historical patterns to which ecosystems are likely adapted?

**Updated questions:** Finally, at specialist recommendation we have changed the wording and emphasis of some questions. For the two questions related to timber volumes

vii.1 How do the timber output estimates in the Forest Plan compare with actual production?

vii.2 What are the economic consequences of deviating from the estimated Forest Plan timber outputs?

We changed the wording to compare timber output to the current targets set for the Umpqua National Forest from the Pacific Northwest Regional Office, rather than the Probable or Allowable Sale Quantity outlined in the 1990 Forest Plan and original 1994 Northwest Forest Plan, which are no longer the basis for Forest Service timber management due to significant changes in Forest Service policies, guidance, and legal decisions. For the watershed and fisheries questions that asked, “Are Standards and Guidelines [accomplishing X]?” we changed the wording to “Are management actions [accomplishing X]”, to reflect that it is the actions that have impacts, not the existence of standards and guidelines.

### ***Opportunity to Comment***

Comments about this administrative change will be accepted up to 30 days from the date on this letter. If you wish to comment on this proposed administrative change, you may mail it to the Umpqua National Forest, Supervisor’s Office, 2900 Northwest Stewart Parkway Roseburg, OR 97471 or email it to [comments-pacificnorthwest-umpqua@usda.gov](mailto:comments-pacificnorthwest-umpqua@usda.gov) with the subject line “Umpqua NF Monitoring.” This letter will also be posted on the UNF website at: [https://www.fs.usda.gov/Internet/FSE\\_DOCUMENTS/fseprd1166512.pdf](https://www.fs.usda.gov/Internet/FSE_DOCUMENTS/fseprd1166512.pdf). The responsible official will consider any comments received on the proposed changes as we prepare future monitoring efforts and reports, but there is no requirement to respond to public comment (FSH 1909.12,32.4). Alice Carlton is the responsible official for this change. This administrative change will become effective upon signature and will be posted online at the Forest’s website. Administrative changes are not subject to the objection process (36 CFR 219.50).

For more information on this administrative change to the UNF Forest Plan, or monitoring and evaluation on the Forest in general, please contact Karie Wiltshire, Forest Environmental Coordinator at [karie.wiltshire@usda.gov](mailto:karie.wiltshire@usda.gov) or 541-957-3466.

Sincerely,

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*ALICE CARLTON*  
*Forest Supervisor*