NW Forest Plan Ammendment NOI Comments

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Please consider these comments for the Northwest Forest Plan Amendment NOI (#64745):

For me, the NOI lacks boundaries and specificity for the type of comments that the Forest Service is interested in receiving so the comments received will span the absolute gamut. To that end, my comments will also fall into this pattern.

1. **Mature / Old Growth-**

In 1993, Congress authorized and allocated funding for the Pacific Northwest Region of the Forest Service to establish a large-scale silvicultural experiment to examine new forestry and landscape management techniques. This initiative became known as the Demonstration of Ecosystem Management Options (DEMO) Study and was implemented on five Forest Service managed locations (two in Oregon, three in Washington State) and one site located on Washington State managed forests outside of Olympia, Washington. A more detailed background and explanation of this project can be found in the Forest Service General Technical Report PNW-GTR-978[1] but the intent of this study was to examine alternatives to the long established method of timber harvest by clearcut.

This was accomplished by retaining a "control" unit where no prescriptive actions were taken and then implementing five different prescriptive actions on nearby stands similar in size and character. After implementation in the late 1990s, each site was periodically studied to monitor the outcomes of each treatment. The reason I am referencing this study is because these DEMO project sites were implemented in mature and old-growth forests. Sadly, the project has lost its funding as of 2015/2016 but there is still about 15 years of research to draw back upon. Aubry and Halpern (2009)[2], published a synthesis of DEMO project findings and those findings support the claims that mature / old-growth forests serve important roles. Compared against the stands that had been "treated," the older control and leave tree aggregate stands had:

- More species richness per sample plot (+2 vs -4)
- Higher levels of soil moisture retention
- Cooler air temperatures

I've provided just one example and study that supports the notion that mature / old-growth forests are important but countless others commenting on this NOI will be providing hundreds of other research examples. As for changes I would like to see, implemented via NWFP Ammendment, I would suggest the following:

- **Mature / old-growth stands found in any Land Use Allocation (LUA) would be immediately off limits to traditional logging / "forest health" projects.**

  All stands that meet the definition of mature / old-growth as defined in Executive Order (EO) 14072's report[3] (released on April 20th, 2023) would not be eligible for inclusion in projects.

- **Individual trees meeting mature / old-growth criteria (such as the Bureau of Land Management's 40" dbh / pre-1850 criteria) shall be prohibited from being used as anchors for logging operations.**

In addition to careless damage from logging equipment, the chain or cables using as support lines for skyline logging can cut deeply into the bark and cambium layers of the trees (Photo 1, at right).

Photo 1. Trunk damage from anchor use. Preacher Man Timber Sale. 2022 (Coos Bay BLM District)

- **Modernize Forest Plans if more than 15 years old**

Pacific Northwest forests are primarily guided by the Northwest Forest Plan and then more specifically by the Forest Plan prepared for each individual forest. While this NOI will eventually update the NW Forest Plan, nothing like this is happening at the local level. For example, the Mount Hood National Forest's Forest Plan was adopted in 1990 and much has changed in terms of our understanding of wildfires, forestry, and the environment. We need to revisit the Land Use Allocations (LUA) that were established 30+ years ago and see if changes need to be made to further emphasize the preservation of our mature / old-growth forests. The Late-Successional Reserve LUA (LSR) was created to advance the development of late-successional forests through restrictions on logging & other management activities. Unfortunately, even today we have logging of mature forests within LSRs that are now even opposed by one of the founders of the NW Forest Plan itself: Dr Jerry Franklin[4].

- **Create stand age datasets for national forests**

The Bureau of Land Management in Oregon has a statewide dataset; why doesn't the Forest Service have something similar? Several national forests in the Pacific Northwest used to have this (Mount Baker-Snoqualmie for example). These older datasets were created in the late 1980s or 1990s & were based on staff knowledge, the deprecated VEGIS Database, and aerial photo interpretation. My understanding is that today the current workflow is to only assess stand age as new projects are identified. A classified satellite imagery product (such as the GNN Structure data product), which has been developed by the team at Landscape, Ecology, Modeling, & Analysis (LEMMA) at Oregon State, is used as the starting point and then staff groundtruth this information to fine tune the information. I would suspect that this (or a similar product) was used by the Forest Service / BLM team to address the mature / old-growth inventory that was required by EO 14072.

The Forest Service already has many resources at its disposal to make this happen. The GIS layer of cumulative timber harvests can be used as a starting point to define years of origin for many areas. Lidar derived canopy height along with site potential tree height information can be used to ferret out mature stands. The Washington Department of Natural Resources uses Digital Aerial Photogrammetry and imagery stereo pairs to create a 3-D top surface elevation raster which they update roughly every two years for their entire state. The point is that we desperately need this at the project planning level to make better informed decisions.

- **Any Logging or cutting of individual mature / old-growth trees must require pre-approval by Forest Service staff.**

Since timber sales are implemented by contractors, they have a vested interest in the maximum financial return from their operations. Contractors cannot be trusted to be impartial when deciding whether or not a mature /

old-growth tree needs to be cut down. The public must trust Forest Service staff to manage and care for our forests and so these decisions should be made by them.

2. Survey & Manage Consistency across National Forest Units

In 2020, I FOIA'd the Forest Service to obtain Survey & Manage data for Northern Spotted Owl and Red Tree Vole for several National Forests in Oregon & Washington. While the Forest Service has the Natural Resource Manager Wildlife (NRM Wildlife) database application for storing Survey & Manage information, I was shocked to discover that I received no information from some National Forests that I had specified (example: Mount Hood National Forest). Is Survey & Manage being implemented consistently across northwest National Forests? Based on my FOIA results, I have some serious concerns. Good management decisions cannot be made with faulty or incomplete data.

Furthermore, a lack of funding and/or staff to accomplish Survey & Manage surveys when required also exists. The Umpqua National Forest's Quartz Timber Sale project on the Cottage Grove Ranger District only found one Red Tree Vole nest site within the project area during its initial survey but the Northwest Ecosystem Survey Team (a volunteer citizen group) found over 70 active nests following the same survey protocol that the Forest Service uses during their surveys[5]. This disparity between Forest Service staff findings and equally trained and credentialed NEST volunteers has played out elsewhere in the Pacific Northwest as well (Mount Hood National Forest's Zigzag Integrated Resource Project in 2019).

3. Pechman Survey & Manage Exemptions

Related to the last point about Survey & Manage, is it time to revisit the guidance established in the Pechman Exemptions based upon the current body of research about species such as the Red Tree Vole (RTV)? This exemption absolves the Forest Service / BLM from doing surveys in stands less than 80 years of age but research does show that RTVs do use stands younger than the 80 year old cutoff. According to the Forest Service's *Field Guide to Red Tree Vole Nests* publication[6], "…Tree voles are associated with old coniferous forests (≥80 years old) that are structurally complex, but are often found in young forests (<80 years old), especially in unthinned young forests adjacent to old forest."

The Willamette National Forest's Calloway Project[7] is an illustration of this dynamic. While the project has been described as treating stands less than 80 years of age, many of those stands are found intermixed with older forest, and older forest with Survey & Manage populations. Attached to my submitted comment is just one example showing the proposed project units along with previous Survey & Manage observations. Given the parameters of the Pechman Exemption, the Forest Service will claim that Survey & Manage is not required but this project will have a very real chance for impacts, even if the actual units are less than 80 years old.

I would like to see something codified where NSO Core Areas and noise impact buffers are utilized to identify stands within project areas that should be surveyed.

4. "No Net Loss" for Mature / Old-Growth Forests

The nation has adopted a "no net loss" policy with respect to wetlands since 1989 so why shouldn't we apply this policy to mature / old-growth forests? Our pledges to preserve old-growth require teeth to be effective and our experience with wetlands provides us with a path forward.

Thank you.

Literature / References Cited in these Comments:

1. **Aubry, Keith B.; Halpern, Charles B. 2020.** *The Demonstration of Ecosystem Management Options (DEMO) study, a long term-experiment in variable-retention harvests: rationale, experimental and sampling designs, treatment implementation, response variables, and data accessibility.* Gen. Tech. Rep. PNW-GTR-978. Portland, OR: U.S. Department of Agriculture, Forest Service, Pacific Northwest Research Station.136 p. https://www.fs.usda.gov/research/treesearch/59269

2. **Aubry, K.B.; Halpern, C.B., Peterson, C.E. 2009.** *Variable-retention harvests in the Pacific Northwest: a review of short-term findings from the DEMO study.* Forest Ecology and Management. 258(4): 398–408.

3. https://www.fs.usda.gov/sites/default/files/mature-and-old-growth-forests-tech.pdf

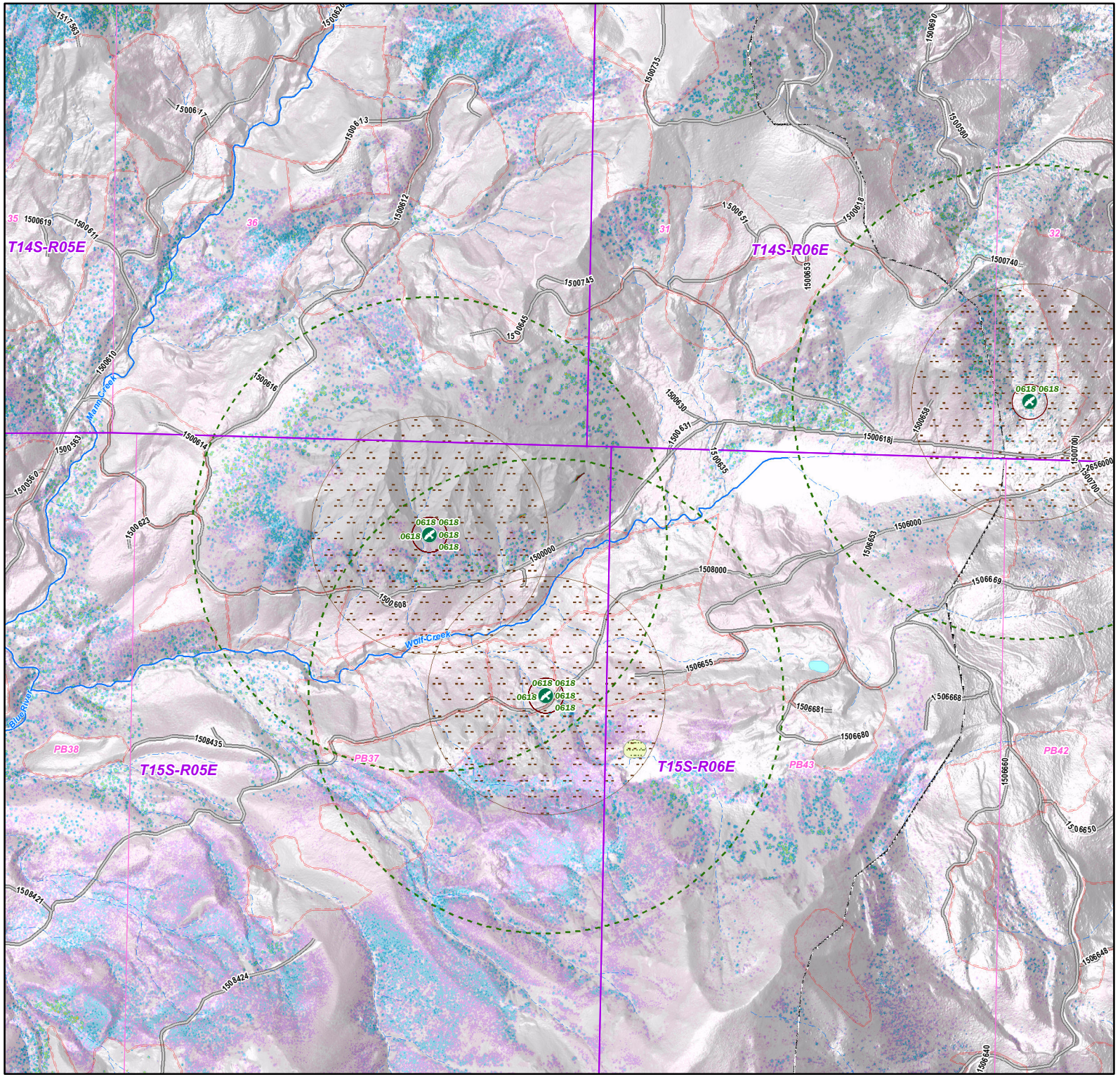
4. https://www.registerguard.com/story/opinion/columns/2021/04/27/guest-view-protect-older-natural-forests-western-cascades-jerry-franklin-norm-johnson/7385736002/ *(accessed 7/17/2023)*

5. https://eugeneweekly.com/2018/05/16/conservation-groups-sue-forest-service-over-cottage-grove-timber-sale/ *(accessed 1/29/2024)*

6. Lesmeister, Damon B.; Swingle, James K. 2017. *Field guide to red tree vole nests.* Interagency Special Status and Sensitive Species Program. USDA Forest Service, Pacific Northwest Region and USDI Bureau of Land Management, Oregon/Washington Portland, Oregon. 41 p.

   https://www.fs.usda.gov/treesearch/pubs/54634

7. https://www.fs.usda.gov/project/willamette/?project=63148 *(accessed 1/30/2024)*



Calloway Thinning Project Lidar Tree Height

- Map 07 -

Canopy Height:

< 50'	175 - 200'
50 - 100'	200 - 225'
100 - 125'	225 - 250'
125 - 150'	250 - 275'
150 - 175'	> 275'

Key to Features:

- Calloway Units
- Survey & Manage NSO Site
- NSO 0.5 Mile Core Area
- 195' NSO Noise Disruption
- 0.25 Mile NSO Noise Disruption
- Forest Service Roads
- Named Streams
- Unnamed Streams
- Waterbodies
- Swamp / Marsh
- Township / Range Lines
- Section Lines

Lidar Data Source: *Oregon Department of Geology and Mineral Industries, 2016*

0 1,000 Feet

Key to Map Series