Collins
Helping to Build a Better World

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**RE: Notice of intent to prepare an environmental impact statement (EIS): Region 5 and Region 6; California, Oregon, and Washington; Forest Plan Amendment for Planning and Management of Northwest Forests Within the Range of the Northern Spotted Owl, 88 Fed. Reg. 24 (December 18, 2023).**

Thank you for accepting this comment regarding the Forest Service's proposed amendment to the Northwest Forest Plan ("NWFP"). The Forest Service should take advantage of this opportunity to improve the management of our federal lands to support our communities, wildlife, environment and economy.

Collins is a fifth-generation, family-owned company that operates sawmills and manages roughly 370,000 FSC®-certified acres of forestland in Oregon, California, and Pennsylvania. Collins executes annual harvest operations on our ground and in partnership with the Forest Service and local collaboratives to improve forest resiliency. Collins is one of the few sawmill operators still in operation in southcentral Oregon and as such is a leading employer in this region.

Collins, like many industry leaders, has been a strong partner with the Forest Service for many years as we strongly believe there are no borders in forest management and care, and that more can be accomplished in partnership. Partnering has also offered an opportunity for solutions in improving forest health and resiliency, reducing the risk of wildfires, protecting communities, and providing wood products and socio-economic benefits to the communities we reside in. Private industry has shown they are able to address forest health and reforestation at a pace, scale and reduced cost the Forest Service is not able to meet. This has enabled private industry in assisting the Forest Service in meeting some of their objectives in removing fuel loads and accumulated biomass.

Collins agrees with the categories the NWFP Federal Advisory Committee is focusing on, and provides comments below that we hope will help the Forest Service refine the amendment it is considering.

Improvement to Forest Resiliency

The primary threat to old-growth forests is wildfire, and mortality from drought, insects, and disease. Threat analysis from the Forest Service itself showed that 4.4 million acres of mature

forest and 0.9 million acres of old-growth forest have been lost to wildfire, insects, and disease since 2000; in contrast, just 0.2 million acres of mature and old growth have been deemed lost to timber cutting during that time.[1]

Our national forests have been greatly impacted by fire, as have our communities, both economically and environmentally. We felt this impact most directly in 2021, when the Dixie Fire burned though 60,000 acres of our managed land. Over 80 years around Lake Almanor, California, Collins has primarily used selection harvest to manage timber stands on 10-15 entry cycles. Over that time, we have maintained a list of the three largest trees by species on our managed lands. From that list, these are the four largest trees on our managed lands affected by the Dixie Fire:

- Sugar Pine: 83" DBH, 450 years old. **Destroyed.**
- Incense Cedar: 80" DBH. **Alive, but hollowed out and likely to blow down**.
- Sugar Pine: 75" DBH. 350-400 years old. **Destroyed**.
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Our methods have shown that maintaining significant old-growth across the landscape can coexist with sound, science-based forest management. Catastrophic wildfire is the true threat.

Also, many forested areas are just dying off under extreme conditions. In recent years, Collins foresters have witnessed unprecedented levels of mortality in National Forest conifer stands across region, elevation, species, age, and diameter classes. This includes old growth, which is dying off at increasing rates never before seen. Such mortality was first observed in white fir stands; this was commonly referred to as "Firmageddon"[2] in the media and was widely reported in 2022 and 2023.[2] Mortality has spread to ponderosa and sugar pine stands, as well as Douglas fir. The common denominator among all these examples is density. Overly dense stands are creating stressed populations of trees that are unable to survive drought, insect attacks, and disease, while increasing the risk of catastrophic wildfire.

Research and on-the-ground evidence continues to show that reduction of density clearly benefits forest health and increases resiliency to drought and other stressors.

- James Johnston at Oregon State University recently published findings[3] that significantly advance our understanding of how to improve both forest and climate health. His findings show that mechanical thinning in Eastern Oregon's forests, in particular, is a vital tool in restoring the health and resiliency of these seasonally dry forests. His study shows how thinning allows for more water sunlight are able to reach the forest floor and provide stronger wildfire resiliency.
- Knapp, et al,[4]have shown how variable thinning and prescribed fire have positive effects on reducing mortality from drought.

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[1] https://www.fs.usda.gov/sites/default/files/fs_media/fs_document/MOG-Threats-Intro.pdf
[2] 'Firmageddon': Researchers find 1.1 million acres of dead trees in Oregon (nbcnews.com)
[3] Thinning makes forests healthier, according to research from Oregon State University - OPB
[4] Knapp, et al. "Variable thinning and prescribed fire influence tree mortality and growth

The implication is clear. To best preserve mature and old-growth forests, action must be taken to reduce densities of these stands. Existing and emerging practices in forest management and ecological silviculture must be used to confer greater resilience to disturbance-dependent ecosystems.

Moreover, it is essential to recognize that these dry-type stands will never reach a stage where intervention can cease. These are dynamic ecosystems that constantly grow and change with conditions on the ground. Uneven-aged management can reestablish proper densities for this forest type, and, even as important, can mimic the natural disturbance patterns of wildfire on an on-going basis. This captures the benefit to the forest of disturbance and density reduction without the risk of catastrophic wildfires; at the same time, it generates forest products needed to sustain rural communities and meet our national demand for climate-smart housing.

Benefits of Timber Harvesting

The United States is one of the largest consumers of wood products in the world. Oregon has become the top U.S. producer of softwood and plywood production and has become a leader in manufacturing innovative mass timber engineered wood products. The timber industry employs over 61,000 Oregonians, primarily in rural areas, and contributes over $86.9MM in direct economic activity in the state.

Oregon and Washington are in a housing crisis that is only worsening. Timber supply in the PNW is declining and the next 50 years show an even higher increase in decline. Instead of importing wood from countries with little forest management oversight, and adding to climate change, the PNW should be supporting local communities by providing jobs locally through local timber harvesting. This is the smartest climate choice, the economic choice, and the use of sustainably harvested timber would be used, while meeting the demands of our housing needs.

The Oregon Private Forest Accord has and will lead to changes in riparian management on industrial forestlands and is expected to reduce timber supply from Oregon's industrial forestlands by an estimated 5-10% annually. This reduction could be as high as 270 million board feet per year, and lead to the loss of 3,000 private sector jobs. The Oregon Department of Forestry is changing its Habitat Conservation Plan (HCP) covering western Oregon state forests. Recent analysis suggests the final HCP could reduce timber harvests on state lands in western Oregon by 40%, with a $13-18 million annual impact to county revenues that support basic services like schools and emergency services in those communities. We share this information to express concern about the future of timber supply, and the financial impacts to our communities, our forest and the few remaining sawmills in the state which have a direct impact on our state's budget.

This is not to say that forest management and the timber industry have to be considered in a zero-sum manner with forest health and resiliency. In fact, private industrial landowners are strong partners in reducing and mitigating wildfire and insect infestation on both private and federal lands. Most Oregon's timber companies are family-owned, small companies making a

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during and after a severe drought" *Forest Ecology and Management* 479 (2021) 118595. Sep 4 2020. https://doi.org/10.1016/j.foreco.2020.118595

significant difference in the communities in which they reside. Private industrial landowners have become a strong partner with the Oregon Department of Forestry in wildfire prevention and in fighting fire often using their own time and resources during fire responses and are partners in the all-hands approach needed to protect communities and resources from the ravages of a large fire. In addition to providing time, local knowledge, and equipment during actual fires, private forest landowners also intentionally manage their lands with fire prevention and mitigation squarely on the forefront. As a result, privately managed lands are often used as operating points and fuel breaks by fire response managers as they aim to slow growing infernos.

Request

It is time to shift the way we approach forest management and care. That said, an amendment is not enough. We are past the time to fully re-write how we manage our forests and feel strongly the need to revise the NW Forest Plan completely and in a way that addresses all communities, and the forest as a whole, not just in compartments (ie. Species specific)

Since an amendment is where we are at in this moment, we hope that in this amendment, the Forest Service will consider:

1) Continued emphasis on managing the Matrix lands: Reducing stand density in alignment with forest health and fire resiliency goals and provide treatment of all diameters to meet forest health and fire resiliency goals
2) Active management strategies must include thinning, timber harvests, fuel breaks, maintained and safe transportation routes for firefighters, prescribe burning, improvements in the detection of wildfire starts, and aggressive suppression tactics near and in at-risk landscapes.
3) In eastside, dry-type forests specifically, uneven-aged management techniques must be used urgently and at-scale to stabilize these ecosystems and halt to trend of increasing mortality in the face of extreme drought, heat, insect attack, disease, and wildfire. These techniques must be used now, and, just as importantly, on an on-going basis into the future so that mature and old-growth forests can be cultivated and stewarded for the benefit of all Americans.

Collins greatly appreciates the work of the committee. Your time and expertise are critical at this moment.

Sincerely,

Galen Smith
VP Resources, Collins