

February 2, 2024

Director, Ecosystem Management Coordination
201 14th Street SW, Mailstop 1108
Washington, DC 20250-1124

RE: Notice of intent to prepare an environmental impact statement (EIS) on Land Management Plan Direction for Old-Growth Forest Conditions across the National Forest System, 88 Fed. Reg. 88,043 (December 20, 2023).

Thank you for the opportunity to respond to the Notice of Intent (NOI) captioned above. 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 both on our ground as well as 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 northeastern California and as such is a leading employer in these regions. In California and Oregon, Collins emphasizes using an uneven-age silvicultural regime, which promotes health of our forest resources, healthier watersheds, and a healthier environment for wildlife.

While Collins supports the need to protect and enhance forests of all successional stages, including old-growth, from wildfire, insect and disease damage, and other climatic stressors, we do not support the proposed strategy of doing so with a nationwide amendment on an aggressive timeline of less than one year. Such an approach fails to accommodate and respond to the dynamic, geographically specific, ecologically unique forest ecosystems and tree species across the 193 million acres of federal land under the Forest Service's stewardship.

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

¹ https://www.fs.usda.gov/sites/default/files/fs_media/fs_document/MOG-Threats-Intro.pdf

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.

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. 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 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.³
- Knapp, et al,⁴ have shown how variable thinning and prescribed fire have positive effects on reducing mortality from drought.

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;

² <https://www.opb.org/article/2023/01/03/think-out-loud-aerial-survey-reveals-massive-oregon-fir-tree-die-off>

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 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>

at the same time, it generates forest products needed to sustain rural communities and meet our national demand for climate-smart housing.

Private industrial landowners are strong partners in reducing and mitigating wildfire and insect infestation on both private and federal lands. Collins works closely with our neighboring national forests. For example, we are currently working with the Fremont-Winema National Forest on many projects, from timber sales to IRSC and BPA work, to a Master Stewardship Agreement centered on post-fire reforestation. We are concerned with how a national amendment would impact our ability to manage our own lands, which, as mentioned above, have a significant component of old-growth trees, and how our current partnerships/contracts with the U.S. Forest Service would be affected. Will our current agreements be honored, or will they be reevaluated and changed?

We are concerned with how a national amendment would impact or change the ability of private landowners to manage their lands, conduct timber harvests, treat hazardous fuel loads, and perform other silvicultural activities when they are immediately adjacent to any new land allocation or old growth forests impacted by the national amendment.

Because of our effective management, Collins lands are often used during fire events for operating points and fuel breaks, and our roads are used by fire fighters. We are concerned about how this amendment could affect road access and fuel breaks on national forest lands, and how that in turn will affect our lands and management.

Collins, and the communities where we reside, care deeply about the health and resiliency of our National Forest System and all the values they provide to society, including the protection of old growth forests from the impacts of wildfires, drought, disease, and insects. We have found the best way to protect old growth on federal lands from these threats is through proactive, science-based, intentional, strategic, active management in partnership.

We hope and request that you consider and incorporate these comments and questions in your next draft.

Sincerely,

A handwritten signature in black ink, appearing to read 'Galen Smith', written in a cursive style.

Galen Smith, VP Resources
Collins