

September 18, 2024

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

**RE: Amendments to Land Management Plans to Address Old-Growth Forests
Across the National Forest System, Draft Environmental Impact Statement.**

Dear Ms. Mc Crae,

Thank you for the opportunity to submit comments on the Draft EIS Published June 2024 entitled “Amendments to Land Management Plans to Address Old-Growth Forests Across the National Forest System,” also known as the National Old-Growth Amendment or “NOGA.”

Collins is a fifth-generation, family-owned company that operates sawmills and manages 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 health and 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.

Collins submitted a comment letter in February 2024 in response to the December 2024 NOI to prepare an Environmental Impact Statement on Land Management Plan Direction for Old-Growth Forest Condition across the National Forest System (NFS). In that letter we shared how wildfires have become increasingly more severe, often undoing years of carbon sequestration and severely affecting mature and old-growth stands. We shared how Collins has lost nearly 60,000 acres due to wildfire in Oregon and California just in the last 4 years, and the national forests around us have also been heavily impacted, losing hundreds of thousands of acres to fire. Collins and the NFS lost old-growth and mature trees in these fires. Our communities have been jeopardized, both economically and environmentally, and rely heavily on both private industry and the health of our national forest system.

We have several concerns about the proposed Amendment as outlined in the DEIS.

An overarching issue is that the DEIS does not seem to prioritize the primary threats identified in the Analysis of Threats on Land Managed by the Forest Service and Bureau of Land Management (the “Threat Analysis”).

The Threat Analysis clearly shows that disease and wildfire have caused the highest loss of old-growth forests over the last twenty years; these challenges remain the primary active threats today. The Threat Analysis also concluded that old-growth loss was greater in areas

reserved from timber harvest, than areas where timber harvest was allowed.¹ We were heartened to see the Threat Assessment showed that tree cutting, and timber harvest are not a threat to mature and old-growth forests. However, DEIS Alternative 3 would consider banning “commercial timber harvest” in old-growth forests. Through uneven-aged management, Collins has regularly operated in and cultivated significant populations of old-growth trees, and we have lost many of those old-growth trees in wildfires like the 2021 Dixie and Cougar Peak Fires and 2024 Park Fire. National Forests continue to have significantly high stand densities, which are a major contributing factor to mortality of old-growth through drought, disease, and wildfire. Careful harvest operations can mitigate the primary threats to old-growth stands; these operations should be maintained as an option.

The DEIS states that “[o]ld-growth forests will remain forested lands as a part of this amendment process.”² Section 219.11(b) of the Planning Rule states that “[a] plan that identifies lands as suitable for timber production must include plan components, including standards or guidelines, to guide timber harvest for timber production or for other multiple use purposes on such lands.” The lack of a plan for timber production is concerning. There are real economic impacts not just to the timber industry but to our communities if timber harvesting is not allowed to keep our forests healthy. Without a clear indication of the direction the Forest Service will take on active management, wildfires and disease will continue tearing through our forests as they are today.

There is a lack of a clear definition of old-growth or of the differences in managing old-growth trees in dry versus wet forest types. As the Forest Service has established, old-growth forests vary considerably from forest type to forest type and by region. In the Executive Order the Forest Service noted having definitions of old-growth for over 200 different forest types due to the “vast variations in old-growth forest character” across the country.³ The Forest Service is tasked with amending all 155 National Forest plans. How will the Forest Service be able to implement any new layered and restrictive standards, without a clear definition of mature and old-growth forest, when the current goals for forest management are already a challenge to meet. Also, the recommendation to develop “Adaptive Strategies” for every national forest unit seems to offer chaos and a distraction from the work needing to be accomplished. The diverted attention required by these nebulous tasks will have a direct impact, delaying action on the very threats the Forest Service identified in the Threat Analysis. Each forest has its own unique ecosystem and is undergoing its own unique environmental challenges. We are concerned that by not addressing today’s challenges, they will continue to be ignored, and continue to grow, making any recommendations unachievable.

Collins recognizes that the Forest Service has been challenged with a complex task in the Executive Order. We also acknowledge the sensitive nature of balancing with work you are trying to accomplish and how controversial forest management has become. As stated above, we hope the Forest Service will take this time to do this amendment ‘right’ as opposed to fast. We also request the Forest Service consider all of the current projects lined

¹ Mature and Old Growth Forests: Analysis of Threats on Lands Managed by the Forest Service and Bureau of Land Management in Fulfillment of Section 2(c) pg28

² DEIS at 121, S-14

³ Mature and Old Growth Forests: Definitions, Identification, and Initial Inventory on Lands Managed by the Forest Service and Bureau of Land Management in Fulfillment of Section 2(b) page 14

up for completion and ensure those move forward; these projects are needed to help mitigate future high intensity wildfire and prevent further loss of public land.

This summer the west is yet again facing one of the worst fire seasons ever experienced. It seems the Forest Service is trying a *band-aid* approach to an issue that needs proper, strategic addressing and planning. It seems a good use of time and resources would be to address the current challenges identified by the Threat Analysis. All forest types should be included and considered in developing unique forest plans by region and forest. We are long overdue for proper forest management. The result of the lack of proper management has been the loss of public forestland from wildfire and disease, closure of many sawmills and loss of jobs, loss of communities due to mill closures and wildfire, an epidemic of disease insect outbreaks, and an increase in wildfire health related complications to all Americans.

Like the Forest Service, Collins supports maintaining and restoring the ecological integrity of our forest system across every stage of development and we recognize the need to protect these forest types. Collins partners with the FS for many reasons, but mainly to assist the forest service in achieving forest management and post-wildfire reforestation goals. Through these partnerships we have witnessed the confounding and cumbersome processes that tie up our FS partners, resulting in limiting the work accomplished. Private industrial landowners appreciate the opportunity to continue to be partners in forest management.

Thank you for the opportunity to submit our comment.

Sincerely,

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

Galen Smith
VP, Resources
Collins Company