Elizabeth Byrd Comments on Northwest Forest Plan Amendment 3/10/2025

Several citizens have collected forest data on the Siuslaw National Forest which is viewable at

https://www.google.com/maps/d/edit?mid=1cHpNajEcWjQflusjJKQn_zymSFh_Z-I&usp=sharing

This effort was begun a few months ago in response to the lack of data on where Mature and Old Growth trees are located in the Siuslaw National Forest. Concerned citizens went out into the forest, took pictures and recorded additional data such as DBH (Diameter at Breast Height), groundcover, condition of canopy and more. The effort is ongoing.

Screenshot from Google map layer provided separately as Attachment 1

Before I begin my comments on the DEIS, I must first bring up some very important points.

Where is the science behind altering definitions of Mature and Old Growth trees?

USFS has apparently arbitrarily changed the definition of Mature and Old Growth trees. In documents only about 3 years old, Old Growth trees were defined as over 120 years old. Now the USFS declares that in order to be considered Old Growth, the tree must be 200 years old or more. Similarly, Mature Trees were defined as between 80-120 years old. Now Mature Trees are defined as between 120-200 years old. It's hard not to believe that these redefinitions are solely driven by the USFS need to increase logging.

The document mentioned above was listed on USFS website until quite recently. Now it has disappeared. We hope to see these documents available again as soon as possible on the USFS website. The file is entitled 'Mature-and-old-growth-forests-tech.pdf'

Side note: I used to be able to access USFS extensive documents on Old Growth. Now I find that I am blocked from accessing many documents. It is disappointing and concerning that USFS is not maintaining transparency of their data.

The public deserves a complete scientific rationale for doing this, especially since it radically increases the total number of theoretically loggable trees.

COMMENTS ON THE DEIS

Thank you for the opportunity to give comments on this very important natural resource in the Western United States

LATE SUCCESSIONAL RESERVES

Opening LSRs to logging for trees under 120 years old

The late successional reserves that were set up after initiation of the Northwest Forest Plan have been a great success for the most part. Citizens could relax and feel confident that there were forests that would be allowed to mature and provide all the benefits that mature and old growth forests do, such as endangered species habitats, protection for salmon, areas where fungi and forest plants could proliferate, places to enjoy the relaxation and wonder of the forest. USFS staff could feel proud of this accomplishment that (if left intact) would leave mature and old growth forests for our children, grandchildren and great grandchildren. Again, in a 4 year old document which has now been taken down from USFS site, USFS executives stated that 'LSRs are working well.'

For seven years I have walked the Siuslaw National Forest, marvelling at how quickly trees grow and come back. The particular section of the forest closest to me was subject to extreme logging in the 1920s and yet 100 plus years later, after having been LEFT ALONE, it has recovered into a wonderful living forest. All the natural trees are present, it is not a mono culture plantation that does not support wildlife or indigenous plants and it is not saturated with toxic chemicals. It really is a success story , the Blodgett Tract of Lincoln County, Oregon, now a Late Successional Reserve. It's full of mycorrhizal mushrooms, many being choice edible and medicinal mushrooms. There are gray jays, beavers, Oregon giant salamanders, elk, deer, squirrels and more. Rare plants like the Gnome plant and Ghost Pipe. There are several pockets of large Western Red Cedars, a tree which is never planted as it has no commercial value. The Western Red Cedar is not even included in the list of trees put out by USFS in the document FS-1215a April 2023 (**This document has also been removed from public access recently**) However the red cedar has great tribal value and significance.

There will be a large outcry and resistance if the LSRs in the Siuslaw start being logged. Please honor the intent of the LSRs, which is one of the best things the USFS has done.

CLIMATE CHANGE

DEIS Alternative B topics are severely remiss in addressing wet and rainforest zones of the Siuslaw National Forest: Moist forests are different. Every effort should be made to avoid opening up the canopy

and drying out the moist forest. If USFS is serious about fire protection, they would remove the giant slash piles from areas they cut. There are still huge piles close to where I live.

Forest Stewardship: Fire resistance, not resilience, must be the goal of forest management in the Siuslaw National Forest.

Climate: Is not one among many issues – it is the most critical issue for NWFP forest management. It may not be a fashionable concern right now, but in a few years it will again be front and center. Every year is hotter than the last. USFS will be remembered for what they did or did not do to address this issue.

Ecosystem Integrity: Wet and rainforest temperate ecosystem integrity is not supported by commercial timber removal and extensive road networks. Non- commercial plantation thinning (minimum canopy cover of 75%) and underplanting are warranted.

Carbon: World class sequestration of atmospheric CO2 is a natural outcome of proper forest stewardship when managing for wildfire resistance and ecosystem integrity. This is especially true for the Siuslaw National Forest.

The Siuslaw National Forest is an absolute gem as it grows very fast and I can say from personal experience in the Lincoln /Lane county area there are still beautiful wild stands of mature and old growth trees, mostly in LSRs, but also in Matrix lands.

In many of the USFS Matrix lands, the forest has been opened up very aggressively, and not only that, huge slashpiles have been left as a fire hazard. Forest Rd 1045 between Yachats and Waldport clearly shows the effects of this 'Thinning'.

DEIS must base forest thinning on wildfire resistance and the retention and build-up of sequestered carbon for the Siuslaw National Forest's wet and rainforest life zones. Forest thinning for all moist, wet and rainforest forests must maintain at least 70% canopy cover post-thinning. 75% or more forest canopy is necessary for wildfire resistance in wildfire refugia management strategies.

ECONOMIC CONCERNS

Jobs and Timber

I am not opposed to all logging, but definitely opposed to logging trees over 80 years old. Existing timber plantations should be used and mature and old growth trees should be left alone as they are highly efficient carbon sinks. As far as economic concerns, there is not enough sustainable timber to support rural communities for more than a few years. When all that timber is cut, what are those communities going to do then? Our environment will be in much worse shape and those communities will still need to make a living.

When the aerospace industry laid off workers in the mid 90s, the government came up with a retraining program taking those middle-aged workers and giving them a chance to learn a new skill to support their families.

I would respectfully suggest that at the State and Federal level, a retraining program should be put in place for loggers. Hopefully it would also offer less hazardous ways of making a living.

Mostly employed in densely forested pockets of the Pacific Northwest and the South, loggers have the highest rate of fatal on-the-job injuries of any civilian occupation in the nation, outpacing roofers, hunters and underground mining machine operators.

About 100 of every 100,000 logging workers die from work injuries, compared with four per 100,000 for all workers, according to the Bureau of Labor Statistics.

FOREST INVENTORY

USFS management of Region 6 needs to provide inventories of mature and old growth trees in detail on maps. Proper decisions cannot be made without this data being freely provided to everyone that is interested. We know that the USFS has this data.

Please amend the DEIS to include language directing each national forest to be transparent about forest stand inventories and GIS based data relevant to mature and old growth stands. Forest inventory data must be readily and easily accessible to the public.

The best option amongst the 4 options is Option A- Do Nothing. That is because the preferred USFS option B mixes some very good things with some very bad things. It's great that the tribes are being recognized and included. But we want our Late Successional Reserves to keep on maturing and growing into Old Growth forests. Logging should be done in younger plantations. Old Growth (the old definition of 120+ years) should be retained in Matrix lands.

Please go back to the drawing board and provide an option that includes tribes and tribal knowledge and also protects late successional reserves as they have been protected in the past.

Sincerely

Elizabeth Byrd

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