

Comments on Proposed NWFP Amendment

Ms. Jacque Buchanan, Regional Forester, Pacific Northwest Region

Ms. Jennifer Eberlien, Regional Forester, Pacific Southwest Region

R6 - Pacific Northwest Region All Units

USDA Forest Service

1220 SW 3rd Ave Ste. G015

Portland, OR 97204

Submitted Via:

<https://cara.fs2c.usda.gov/Public//CommentInput?Project=64745>

Dear Ms. Buchanan and Ms. Eberlein,

As a resident of Josephine County in Southwest Oregon since 1993, I was able to witness the Northwest Forest Plan's success in calming the timber wars that caused so much pain in our community. While too many treasured public lands have continued to be logged, much more has been protected. I have enjoyed the beauty and majesty of our remaining old growth forests and the recovering second growth stands that are progressively attaining old growth characteristics. As a volunteer for ecosystem protection efforts in my bioregion and across the state of Oregon, I dedicate countless hours to advocating for leaving these multi-layered old growth and mature forests standing to safeguard habitat, abundant clean water, cooler microclimates, and carbon sequestration and storage.

The Forest Service's proposed amendment unfortunately undermines many of the protections that have allowed the Pacific Northwest's forests to remain the world's largest carbon sink. Living in Southwest Oregon, I know too well that with climate-exacerbated drought and increased red flag weather, wildfire is a growing risk and we must take measures to prepare and reduce losses from large, uncontrollable fires. This is why I work to educate my community about defensible space and home hardening and why I participate in a Firewise community.

I applaud the Forest Service's efforts toward correcting the exclusion of Tribal voices in the crafting of the original Northwest Forest Plan. I support meaningful inclusion that goes beyond consultation, and incorporation of indigenous science that comes from a whole-ecosystem lived approach to ecological integrity.

I begin my more-specific comments on the Northwest Forest Plan Amendment DEIS by stating my strong opposition to the proposed changes that would raise the allowable cut age in dry forests in LSRs (and other LUAs) to allow cutting of trees up to 150 years of age at any time, and with vague exceptions that allow for cutting trees even older than 150 years. (See DEIS, table 3-2, on page 3-25; and DEIS, table 2-1, on page 2-18, 2-17 re LSOG age change and exceptions found in the proposed Standards and Guidelines, as well as in Table 2-1.)

At the public meeting I attended, Forest Service staff were not able to refer me to a scientific basis for such a change. They assured me that the Forest Service understands that scattered 150+-year-old trees do not make a forest. However, without strong requirements in the DEIS for

adequate (70% for NSO) canopy closure and retention of multi-layered forest features, this is no reassurance at all. The DEIS in general leaves far too much to the discretion of local managers, especially in an era of increased use of categorical exclusions.

**The DEIS failed to analyze the number of acres of Dry forest (Matrix and LSR both) that would be open to cutting if the 150 year threshold is adopted.** This calculation of impacted Dry Forest acreage should be provided in an SEIS. Such an analysis would be analogous to the calculation that was provided regarding acreage of 824,000 acres of moist LSR that would be impacted if the cutting age threshold increase to 120 years of age were implemented. **The DEIS also failed to analyze the ecological impact on ecosystems and habitats if the proposed age changes are adopted.** An ecological and habitat analysis of this type should be undertaken and released as part of an SEIS.

In addition to opening an additional 824,000 acres to logging, the Forest Service's proposed amendment would allow logging in all Moist LSRs in order to "maintain or restore habitat" for "species that depend upon younger stands." This would eviscerate the entire concept of LSRs, which were originally intended to provide large blocks of older forests for species like the Northern Spotted Owl. Natural disturbance and management on Matrix lands provide the habitat for these species, and **LSRs must be maintained for late successional-dependent species' habitat needs, not early-successional.**

Proposed changes for Matrix that would raise the allowable cut age threshold by employing forest "establishment dates" rather than "stand age" for forest protection are not ecologically justified. They would essentially lock existing mature forest stands out of potential protection. The proposal for Dry Matrix to protect trees existing prior to 1850 (i.e. 175 years of age or older today), would not protect new trees started after 1850. There is no ecological basis for leaving a group of trees that fall into that age gap unprotected. **The Forest Service has failed to provide for adequate future recruitment of old growth under its proposed amendment.**

While some have claimed that the threshold of 80 years for cutting trees in the NW Forest Plan area was arbitrary, this is not the case. The literature from the 1990s includes many scientific articles and treatises which utilize the 80-year threshold as the transitional age in the life stage of trees to Mature status. This is the stage where trees in both Moist and Dry LSRs need to be protected.

See the following:

i) 1993 FEMAT (Forest Ecosystem Management Assessment Team),  
see sample pages and language copied below:

Page II-19:

"Late-successional forests -stands in mature (80+ years) and old-growth seral stages -compose a large percentage of this total."

Page III-21:

"West of the Cascades there is no entry allowed in stands older than 80 years of age."

page IV-22:

"Late-successional forests include mature forest stands greater than 80 years old,

stands of mixed age (mature and old-growth forests), and old-growth forests.”

Page IV-39:

“In this process our working definition of late-successional, including old-growth forests included all forests in which the dominant overstory trees were at least 80 years old.”

Page IV-53:

“In Washington and Oregon, the abundance and distribution of late successional forests (forests older than 80 years) were estimated from digital maps derived from satellite imagery classified by Pacific Meridian Resources under contract with the Forest Service.”

**The Forest Service must retain the 80-year threshold that supports the original vision to Steward and Enhance Old Growth ecosystems, including Mature Trees and Stands that was set forth in the 1994 Plan.**

One of the most concerning aspects of the proposed amendment is the mandate to “treat” 150,000 additional acres per decade within community protection areas and 900,000 acres per decade of Dry forest by mechanical means, in addition to salvage.

Regarding salvage, **the DEIS fails to provide ecological justification for expanding salvage in any post-disturbance landscape.** The expansion of salvage across both Moist and Dry forests is not ecologically justified. **The DEIS also fails to provide any ecological justification for removing dead and dying trees from disturbed areas.**

In my area, “wildfire resilience” has been used as the basis for ecosystem- and microclimate-damaging mechanical logging projects in public forests of Southwest Oregon.

Mechanical “treatments” disturb wildlife, soil and mycorrhizal networks, and release carbon. **No mechanical treatments should take place in LSRs** (with perhaps the exception of dense formerly logged stands). While careful removal of ladder fuels and thinning of dense planted stands within 1/4 of high-wildfire-risk multi-residence communities is prudent, science shows that working from the home/structure outward is the proven way to protect homes and infrastructure. Shaded fuel breaks along evacuation routes make sense. Clearcutting large swathes along Forest Service roads as firebreaks does not stop extreme-wind driven fires and should not be implemented. **Community protection areas should be reduced from 1 mile to 1/4 mile.**

Thank you for considering these comments.

Sincerely,  
Carol Valentine  
Selma, OR 97538