

To: the US Forest Service

From: Laura Tully

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I am writing to provide feedback on the alternatives presented in the draft EIS for the Proposed Amendment to the NW Forest Plan (NWFP). As a resident of Oregon for the past 26 years, I have concerns about what little is left of old-growth forests, the species threatened to near-extinction that depend upon these forests, and the mismanagement of thinning to prevent wildfires. Reading over the proposed alternatives to the NWFP, there were several additions compared to the current NWFP of 1994 that are worthy to note. I am impressed by the diligence to include indigenous tribes into the discussion to bring their knowledge and concern into consideration. In addition there are proposed new protections from salvage logging that aren't part of the 1994 NWFP that are commendable. In the end there is only one alternative makes sense – Alternative C.

Of the proposed alternatives, only one actually preserves and offers the possibility of adding new stands to the status of old-growth – that is Alternative C. It is nonsensical to move the goal post from defining old-growth from 80 years of age to 120 years of age. That means we would be losing more old-growth to logging, thinning, and other forest management practices. With only 6% of old-growth forests still left in Oregon, there should be an outright ban on all forest management practices (logging, thinning, road building and other destructive activities) on all stands where the tree age is 80 years or older. By keeping the requirement defined as tree age, it will allow stands of late-successional trees to mature into old-growth forests, replenishing the tremendous loss. It makes no sense to use “stand establishment dates” since they capture only a point in time, and to ensure there are old-growth forests in the future, late-successional stands must be protected to allow them to mature.

The most deplorable alternative is D. There is no shortage of commercial timber in this country. Wildfire risk reduction should be focused on areas near population centers, not in old-growth forests. Communities that rely on timber economic activity should be encouraged to diversify their workbase as the old paradigm of timber towns is not sustainable.

We are at a tipping point in terms of permanently losing species if we don't change the way we manage forests, particularly old-growth forests. If the only stands that are protected are from prior to 1905, there will be no old-growth forests left as eventually they will die. To have a sustainable model there must be protections of late successional forests to replace and renew.

My recommendation is to pursue Alternative C to protect and nurture old-growth forests.

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