

Data Submitted (UTC 11): 2/2/2024 5:00:00 AM

First name: Ellen

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Organization: Lost Coast League

Title: Chairperson

Comments: Dear Director of Ecosystems Management Coordination:

I am writing to submit comments on President Biden's Amendment to Conserve and Steward Old Growth Forests. I would especially like to address changes to former President Clinton's

Northwest Forest Plan, as I reside in the part of California which is part of Units 5 and 6 of the National Forest, and adjacent to the BLM's King Range.

I am writing as chairperson of the Lost Coast League, an organization which sprung into existence in the 1970' when the King Range was threatened by development and logging.

A significant part of it is now designated as wilderness. The objectives of the League are

the protection of the Public Trust and natural resources of the northern California Coast.

I would like to refer to the Multiple Use Sustained Yield Act of 1960 and the National Forest Management Act of 1976, two pillars of the Forest Service management of our forests. These

Regulations are old. They are no longer consistent with the planetary conditions in which we presently live. They are virtually obsolete. Timber production can no longer be viewed as an objective or as an obligation. THPs (timber harvests plans) can no longer automatically claim that they are producing a "high quality" timber product. Cutting down trees, any trees, destroys part of the planet's ability to sequester carbon, and the earth's climate is unravelling. Forests sequester 17% of our annual carbon emissions.

"The scientific world now sees the entire tree - leaves, trunk, roots, and overstory - as a mighty geochemical agent that has drastically changed the landscape and the atmosphere for the betterment of all living things".
(John Perlin, Forest Journey, 2022)

Without trees, Earth would be another Venus.

What, actually, should be regarded as a "high value forest product" is the quantity of carbon sequestered by a tree, or a forest. To update forest management, and in order not to create adverse incremental environmental impacts on on the planet, this product, carbon sequestration, should replace timber.

The Forest Service states that the national Forest is 17% old growth, and 47% mature forest.

These percentages however do not reflect the fact that only a few percent of the old growth

That once constituted the forests of our country remain. Comparing historic with present forests, we cannot complain that they are "overstocked". Logging, as well as fossil fuels, have caused the deterioration of our air quality. And the forest continues to be cut. Green Diamond, a private timber company in the Pacific Northwest, can still clearcut on $\frac{34}{100}$ of its timberlands.

The trees of the Pacific Northwest can sequester vast amounts of carbon: 2.5 times the amount

Sequestered in the trees of the Amazon Rain Forest. The Forest Service must require a management system which allows trees to reach advanced ages, as the older and bigger they grow, the more carbon they are able to sequester.

The average temperature in the Pacific Northwest has risen 2 degrees since 1900. Ocean temperature has risen 1.2 degrees.

Fire suppression is listed as one of the top priorities of this amendment to the Forest Plan.

There have been devastating fires in the Pacific Northwest, and a resultant rush to reduce fuel load. Conservation groups analyzing the proposal are concerned that the vague language of the proposed amendment leaves room for logging of mature and old-growth forests under the guise of fuel reduction.

For example, forest advocates voiced opposition to the proposed Buffalo Springs Restoration Project slated for Orange County. That project proposed to log more than 5,000 acres of trees inside Hoosier National Forest lay down 19 miles of road construction, and turn eight of 13 miles of horse trail into gravel log road. Community members and forest advocates argued the project would harm wildlife, destroy old-growth trees and pollute nearby drinking water, while the Forest Service argued the project was necessary to preserve the health of the forest.

Fuel reduction, creation of shaded fuel breaks, road building, and other forest management activities in forests create carbon emissions, which add to the cumulative impacts of logging:

" Carbon emissions from logging in the US are ten times higher than the combined emissions from wildland fire and tree mortality from native bark beetles. Fire only consumes a minor percentage of forest carbon, while improving availability of key nutrients and stimulating rapid forest regeneration. Within a decade after fire, more carbon has been pulled out of the atmosphere than was emitted. When trees die from drought and native bark beetles, no carbon is consumed or emitted initially, and carbon emissions from decay are extremely small, and slow, while decaying wood helps keeps soils productive, which enhances carbon sequestration capacity over time.

On the other hand, industrial logging - even when conducted under the euphemism of "thinning" - results in a large net loss of forest carbon storage, and a substantial overall increase in carbon emissions that can take decades, if not a century, to recapture with regrowth. Logging also tends to make fires burn faster and more intensely while degrading a forest ecosystem's ability to provide natural protections against extreme weather events."

-----Logging is the Lead Driver of Carbon Emissions from US Forests :Smith, Hanson and Koehler, Earth Island Journal 2019

Fire-scarred sites are often quickly re-inhabited by multiple species, including the threatened Northern Spotted Owl. This has been documented by owl counts after the Rim Fire and the King Fire of 2014. A burned site in the Rim Fire housed more owls than an adjacent green site. However, after salvage logging occurred, the species vanished.

Northern Spotted Owls have adapted to fire regimes over the millennia, but, unlike the barred Owl, they have not adapted to forest fragmentation and salvage logging.

In 2016, the USFWS superintended a program to shoot Barred Owls in forests where Northern Spotted Owls were present. Now they have proposed shooting 500,000 BO's with the objective of changing the competitive balance. This is a terrible idea. It may be cheaper than providing and nurturing more habitat (loss of which caused the NSO's decline) but it won't work and it will occasion more habitat removal. I will attach an article which I wrote on the subject of Barred Owls. This kind of violence is unworthy of the Forest Service, and should not be part of the amendment.

The catastrophic damage caused by fire should first be addressed with fire hardening of human communities, as was practiced by our predecessors, the indigenous tribes. Kathy McCovey of the Karuk tribe in the Klamath forest, describes clearing fuel load with low intensity burns for a mile around the communities, and then the next mile out for game and wildlife management.

Fuel load reduction in the name of fire prevention. must be watched vigilantly by the Forest Service:

"Effective immediately, any projects proposing vegetation management activities that will occur where old growth forest conditions, based on regional old-growth definitions, exist on National Forest System lands shall be submitted to the National Forest System Deputy Chief for review and approval."

--- Christopher B. French, deputy chief of the National Forest System.

There is a rapidly growing new industry in the forests of the Pacific Northwest, which could justifiably be called end-stage logging. The woody debris created by fuel load reduction is to be hauled to giant wood pellet factories in Tuolumne and Modoc, and no doubt elsewhere soon. This is the result of demand for wood pellets by Europe and Asian countries, where wood fuel is still considered carbon neutral. (In terms of carbon emission and pollution it in fact is worse than coal) and LNG produced by the US is prohibitively expensive.

Another expressed objective of the Amendment is the inclusion of Indigenous tribes, to consult on management decisions. But consultation must be replaced with co-management. Consultation is required according to the modernized Forest Practice Rules, with the specific objective of identifying cultural sites. The timber companies which send the notices report that the tribes do not respond.

Many tribes are overburdened with the obligations of communities which are either impoverished or have a history of impoverishment, which has caused social and economic problems. Many tribes are struggling to

recover their precious cultural heritage, which could be invaluable to the entire world if they succeed. With the prospect of co-management there would be incentive for aspirations to grow, and aid in remembrance of trails, sites, and other indigenous knowledge. Their active participation would add enormously to sensitive and responsible management.

The Forest Service is no doubt aware of the Native American Fish & Wildlife Service. They should be partnered in to share in co-management of forest service lands.

Thank you for including the concerns of the Lost Coast League in your process of amending President Biden's Forest Plan, and including amendments to President Clinton's Northwest Forest Plan.

Very Truly Yours,

Ellen Taylor, Chairperson,

Lost Coast League

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Attachment: Tspostdeletionbarredspottedowls112023 [ndash] Article called, [ldquo]Barred Owl to The Rescue! [rdquo]

Attachment: LetterPresidentsnorthwestforest plan22024.doc is letter.