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Comments: I am submitting comments on the proposed revision of the Northwest Forest Plan from the perspective of having worked under the 1994 Plan. I was a silviculturist on the Willamette National Forest for twenty- five years, approximately half of that time after the Plan was adopted. Although there were many good aspects to the Plan, implementation was often far different than what was projected or intended in the Plan. After receiving the Plan on the Willamette, a great deal of effort was made to go through the document, literally page-by-page, to determine the effects of implementation. The silviculturists, as a group on the forest, were tasked with estimating the impact on the timber harvest levels. I can only recall the effect on the Detroit Ranger District where I worked. Under the 1990 Willamette National Forest Plan the harvest level on the District was 70 MMBF, down from 117 MMBF from the previous level. Under the 1994 plan it was projected to be reduced to about 40 MMBF. After the Plan took effect, however, the on- the-ground realities, appeals, court decisions, and other interpretations, the harvest level dropped to about 12 MMBF. This seems to be in line with the general effect of an 80-90% reduction in Federal timber harvest across the planning area. One of the largest factors in this reduction was a significant increase in the number of acres in riparian areas. The 1994 plan acreage made estimates but they were far short of what was found on the ground. Even though this drop in timber harvest did have a major impact on the community I live in, I'm relating this experience because of the huge disparity in what was projected in the '94 Plan and the reality of how it was actually applied. Hopefully, some of what has been learned since that plan was adopted, will not be repeated in a revised plan.

I have some other issues that I would specifically like to address, some of which are also related to plan implementation.

In the original text of the 1994 Plan, the 80-year stand age was described as the age where mature forest conditions begin. Over time, after the plan was implemented, this evolved into a definition that all stands over 80 were automatically considered mature. This is certainly how appellants to timber harvest see it. Since the plan area covers an area from sea level to the crest of the Cascades and from northern California to the Canadian border, it begs the question as to how a single age can be applied to all stands. This might be true if all the sites were the same, but they obviously are not. Instead of basing the classification of mature on an arbitrary age that was intended as a threshold, stand condition and structure should be what defines what is mature. I'm sure it's easier to tally up stands by age group, but it doesn't provide an accurate account of stand condition.

Related to the definition of mature, is the preservation or future of old growth stands. I support the intent to protect existing old growth, but good luck trying to keep that promise. A case in point for me was the 2000 Beachie Creek fire on the Detroit Ranger District. In particular, the Opal Creek Wilderness, which was composed in large part of 600-year-old plus stands. I had worked in this area extensively and was very familiar with the conditions. Because of their age, much of the Douglas-fir overstory had died out and the remaining stands were composed primarily of western and mountain hemlock, western redcedar and Pacific silver fir, most with dwarf mistletoe, many with dead tops and heart rot. In addition, there were many snags and downed logs adding to the mix. It did not take too much imagination to predict what would happen if a fire under the right conditions occurred there. The area receives about 90 inches of precipitation per year and is generally north facing so it had escaped a major fire for some time. The 70 to 90 mile per hour winds that occurred on Labor Day 2000, however, erased any natural protection the area had. I had seen many fire aftermaths during my career, but don't recall any as severe and complete as what occurred in the Opal Creek area. There are entire square miles without any living trees.

It may be that this was a once in a hundred year or more event, but with climate change this may happen more often than we can predict. Coupled with increased temperature and perhaps less precipitation, it seems almost inevitable that attempting to preserve existing old growth is not a high percentage proposition. Even without fire, many of the existing old growth stands are at the upper limits of sustainability and warming temperatures will only increase stresses that make them more susceptible to other factors, such as, insects and disease. As a silviculturist, I would be hard pressed to recommend a treatment that would protect or prolong the life of a typical

Cascades 400-year-old stand. Protecting individual old trees is feasible to a point. Preserving an entire stand will be much more difficult. Putting all the fires out isn't guaranteed and removing fuel loading or ladder fuel, compromises the stand structure that you are trying to maintain. My only suggestion is to not over promise what can actually be delivered in this plan revision.

During the time I worked under the current plan, there was no strategy to actually designate replacement stands for the existing old growth that would inevitably disappear. We basically defaulted to commercial thinning both plantations and some older fire regenerated stands and although that should improve the growth and vigor of these stands and speed up the development of the understory, there was real no overall plan with a goal or acreage in mind. We just treated stands individually based on the need for treatment and not so much to meet a landscape objective. Perhaps that has all changed and I'm not aware of it.

One of the more frustrating aspects in implementing the 1994 Plan, was related to activities within administrative sites. On my ranger district, this included the office compound, campgrounds, a large Boy Scout camp, and over a hundred summer homes. We also managed about 40 miles of a major highway corridor. There was no mention of these types of sites in the original plan and so when activities such as hazard tree removal occurred, we were required to comply with all aspects of the Plan, including Survey and Manage requirements. This added a considerable amount of time and cost to these generally minor projects. Specifically, I recall a request from ODOT for removal of hazard trees from the highway corridor. The district identified over a thousand trees needing removal under a timber sale, but after meeting riparian and wildlife requirements, so many trees had to be left on the ground that it made a timber sale unfeasible. Since it was no longer a timber sale, there was no funding available for the project. Inevitably, the district turned the tree removal over to ODOT to cut whichever trees needed to be removed. There was also another hazard tree and thinning project within a Habitat Conservation Area along the highway which required REO consultation and a site visit. The project was approved, along with a comment that seasonal restrictions were not required because of the continuous noise and activity near the highway. At some point, the District completed a GIS query that tallied up the amount of land in administrative sites and it totaled about three tenths of a percent of the land base. Because of this small acreage, and the ongoing disturbance and need to maintain them in a safe condition, it would seem that these sites could easily have been exempted from most of the requirements of the plan. Again, perhaps this situation has been addressed, but it appeared to have been an oversight in the original plan.

Thank you for the opportunity to provide input to the proposed revision of the Northwest Forest Plan. Although my comments above describe some of my more negative experiences working under the plan, they were not all negative and I understand that in a document of such scope that are going to be varied interpretations. I particularly enjoyed working on several Watershed Analyses which allowed us to take a broader look at the natural history of the District rather than focusing on specific projects. My primary criticisms of the original plan were both that it made predictions that did not hold up on the ground, and that it was open to wide interpretation by the courts and various Federal agencies.