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First name: Rachel

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Organization:

Title:

Comments: Hello,

I am Rachel Lee Hall. I have lived in the Rogue River Valley over the last forty-eight years. My current and past interests encompass earth dynamics, soils, forestry, reforestation, education and agriculture, the latter of which I am retired from. I became a citizen advocate for Active Forest Management in 2017 with the first web publishing of: Forest Under Stress (FUS) and subsequent related articles of forest stress, loss of resilience and observations through historical and current photograph comparisons. FUS shared concerns of diminishing resiliency and the increasing fire prone National Forest of Southern Oregon Dry Forest.

I retired from agriculture with my job focusing on mycorrhizal symbiotic colonies and root structures, hydrology and especially soil profiles. One past contractual employment was for Rogue-Siskiyou and Freemont NF, planting nursery stock mechanically and hand planting forty-five years ago of half a million conifers. At that time, my interest in the welfare of Northwest Forests began, especially the Dry Forest of Southern Oregon where I am living and love to gather mushrooms, hike, camp, and recreate.

For the Alternative, I chose Alternative D for the reasons below. The Dry Forest is in a rapid loss of resilience annually as it becomes more fire prone, and D Alternative will meet the needs of the forest to save what can be saved from wildfires.

Please consider crown fires that were once rare in the Dry Forest fourteen years ago, but with the scaffolding to the crowns it is just a matter of ignition each year for crown fires to become commonplace with total loss of landscape, including old growth, because wildfires know no boundaries, I include the old growth in wildfire prone landscapes as in danger.

A is static, no action.

B is moderate on all fronts. B is conservative in implementation and lacks teeth to execute mechanical thinning, sufficiently hardening the WUI, a moderate emphasis on workforce development with no flexibility to face ensuing challenges. The workforce is marginalized in the B choice. There is an evident opportunity present to create various skilled forest jobs that will enhance the forest community and restore resilience while mitigating catastrophic wildfires in the pipeline waiting for ignition. Without "flexibility" B is a sure short-term failure and long-term stagnation, especially when the forest is presenting stress and rapid decline in resiliency. Hardening the WUI is critical. The forest is fluid due to its nature and the unknown factors it presents for instance; the sudden death of the Douglas-fir and man is slow to recognize the changes but must adapt to complex situations. I contend without high flexibility that B is an error in choice.

C is minimal intervention, limited economic growth... and states that.

D allows the forest to be treated at the scope needed and restore balance. It states wildland fire restoration and ecosystem balance, strong emphasis on workforce development, restoration of jobs, and timber production, high flexibility in restoration, lowers stand density opening the forest and allowing filtered sunlight in addition to reducing scaffolding to crown reducing crown fires, once rare, promoting active treatments while retaining old growth and hardening the WUI. High Flexibility is the key word on D. All other choices are not flexible.

The Dry Forest over the last three decades incrementally became a closed canopy in many landscapes, which is driving loss of resilience as snow retention is insufficient to sustain the crowded forest floor and hydrology is marginalized in the soil profiles to sustain the terrestrial story. The dry forest was not too long-ago low intensity wildfires running along the forest floor, but rarely to the crown. Those low intensity fires kept the dry forest free from excessive competitive vegetation, marginalized scaffolding access to the crown during ignition and allowed filtered light to the Dry Forest floor. Respiration (air movement) is enhanced, and the forest is fire resistant. Now it is a fuel loaded thermal bomb waiting for ignition, because of decades of lack of Active Forest Management. The D Alternative begins restoration of resiliency, mitigates wildfire conflagrations while promoting forest jobs and brings safe recreation back to the forest, by that I mean wildfires are a threat to the community (smoke included) and recreation during wildfire season thus limiting usage and risking lives. Choice D is Active Forest Management that would decrease wildfire costs and bring fiducial balance back as well as preserve forest landscapes for maximum retention of green biomass and reduce release of CO₂ during wildfires. The D Alternative will begin the process of restoring diminishing respiration, which will restore moisture in the dehydrated soil profiles, which in turn will restore resilience and mitigate release of CO₂.

D lowers stand density, opening the forest to let in filtered sunlight, allows retention of snow budget by reducing the demands made by competitive vegetative growth (a clogged forest), which can't be brokered by annual moisture to the crowded root structures, including mycorrhiza to support the demands to sustain the whole terrestrial story. Too many trees. The forest goes into annual stress losing resilience and respiration. This unnatural density also created scaffolding to the crown for access upon ignition for high intensity wildfire to the crown, which results in loss of entire landscapes and releases stored CO₂. Wildfire is in nature's toolbox and is currently the most used tool due to lack of Active Forest Management. Alternative D begins the process of mitigating wildfires and enhanced forest resilience.

Thank you for reading FUS concerns and observations over the last forty-five years of Southern Oregon N.F. I am genuinely concerned about the Dry Forest of Southern Oregon future to survive under the current conditions. I included attached photos I took. They were all taken in Jackson County, Oregon within the NF and BLM landscapes and in 2020 I was evacuated twice.

My colleague M.T. Rains, a past Deputy Chief, reminds me: Remember, the forest is more than trees.

Kindly,

Rachel Lee Hall

Forest Under Stress (FUS)

<https://healthyforests.org/2023/06/rachel-lee-hall-the-copper-forest-of-southern-oregon/>

ATTACHMENT-FIGURE/IMAGE: IMG_6363.JPG; Photograph of forested hillside

ATTACHMENT-FIGURE/IMAGE: IMG_9809 (2).JPG; Photograph of coniferous forest, including some with red needles

ATTACHMENT-FIGURE/IMAGE: IMG_9813 (2).JPG; Photograph of coniferous forest, including some with red needles

ATTACHMENT-FIGURE/IMAGE: IMG_9816 (2) HFHC photo Copper Forest .jpg; Photograph of coniferous forest, including some with red needles

ATTACHMENT-FIGURE/IMAGE: original_22b6c52f-f00a-4651-8a77-33f0d969a8d3_20240315_130634.jpg; photograph of conifers, some with red needles

ATTACHMENT-FIGURE/IMAGE: burn butte falls 08.jpeg; photograph of smoke in the distance

ATTACHMENT-FIGURE/IMAGE: 5652183370596927901 (3) (2) (1).jpg; photograph of large plume of smoke with fence in foreground and mountain in the background

ATTACHMENT-FIGURE/IMAGE: IMG_7980.JPG; photograph of cloud or smoke behind house and field

ATTACHMENT-FIGURE/IMAGE: IMG_2802.JPG; photograph of conifer forest

ATTACHMENT-FIGURE/IMAGE: IMG_2803.JPG; photograph of forest and dead wood

ATTACHMENT-FIGURE/IMAGE: IMG_2806.JPG; photograph of forest and dead wood

ATTACHMENT-FIGURE/IMAGE: IMG_2818.JPG; photograph of forest and dead wood

ATTACHMENT-FIGURE/IMAGE: IMG_5868.JPG; photograph of forest and dead wood

ATTACHMENT-FIGURE/IMAGE: IMG_5866.JPG; photograph of forest and dead wood

ATTACHMENT-FIGURE/IMAGE: IMG_2806.JPG; photograph of forest and dead wood