

Data Submitted (UTC 11): 3/17/2025 4:00:00 AM

First name: Stephen

Last name: Rossiter

Organization:

Title:

Comments: To whom it may concern,

My name is Stephen Rossiter. I currently live in Eleele, HI, and in my career so far I have worked all across the United States, including 4 years along the Oregon Coast and the Siuslaw National Forest. That was plenty of time to realize the significance of these old forests to our nation and to realize they must be well managed for the long term - looking hundreds of years into the future. I have numbered my points to make them easier to catalog.

1- Of the alternatives presented, none are sufficient to adequately protect old growth trees and old growth forests. Any alternative finally adopted **MUST** protect mature trees from being harvested and must **ABSOLUTELY** protect old-growth trees from being harvested. More, not fewer forest acres should be allowed to recruit into older ages.

2- It is important to protect old growth trees wherever they occur. Humans need to be able to discover great old trees as they explore unknown-to-them places. This brings very valuable feelings of awe and peace that are not readily available if there are just a handful of known, over-touristy, overcrowded old growth stands. They also provide more opportunities for recreation such as hiking and birdwatching which also benefit from a dispersed feeling of being around few people. America is great because it is a big country with lots of possible places to get away from it all and see the many varied and wonderful forms of undisturbed nature.

3- I feel like numbers saying there are thousands of acres of mature and old growth (>200yrs) understate the importance and rarity of very old trees, so there should be a new class called extremely old growth (300+years, very large dbh, and/or high structural complexity) which should be protected above all else.

4- I am against the harvest of any of those extremely old trees (300+ years old). I would not be if there was a lot of that habitat left, but that is absolutely not the case. We as a nation already had our chance to have a sustainable old growth harvest industry and we blew past that without thinking decades ago. So now we must wait. We must not be premature. We must wait many decades more to allow enough forest to age into old growth conditions - both to provide sufficient habitat for the unique species that require such habitat to exist, and for a truly sustainable long term industry that produces old growth timber. If some forests were to be harvested on a, say, 400 year rotation, that would mean we would only harvest 1/400th of that area each year (and actually a bit less than that when accounting for losses to wind and fire events). Thus we should resist the short term urge to dip into the late successional reserve and instead anticipate the greater returns it will bring in the future, which will make our children and grandchildren wealthier and with the opportunity to experience an abundance of wildlife that is currently rare.

5- It should be clarified in the final version that any specifications for output of a certain amount of board feet per year should not be met by dipping into mature or especially not old growth reserves. Not meeting a production quota should be preferable to harvesting old growth trees.

6- I do support greater collaboration with tribal governance as described in alternatives B/C/D.

7- I do support the use of beneficial fire as a wildfire prevention tool in some cases, as that is less damaging to old growth than bulldozers and mechanical fire suppression means, etc. Use wildfire strategies that prioritize community safety and proven prevention measures rather than logging.

8- Why have 40 years been added to the proposed definitions of mature and old growth compared to what was in the original Northwest Forest Plan when only 30 years have passed since the plan's inception? To be consistent and to allow more forests to recruit into protected age classes, young forests should now be defined as 110 years old or less, not 120 years.

9- Stand age should continue to be used to define which category a stand is part of. By defining stands as harvestable or not based on their establishment dates rather than by their current age means that stands could eventually be harvested even if they would otherwise be too old and that would prevent them from aging into old growth habitats, which is what we need more of.

10- The use of, and width of, riparian buffers should be increased as they not only protect salmon habitat but also provide habitat connectivity for old forest species across what is an otherwise very patchy and fragmented landscape of large trees.

11- Any alternative that allows logging to "(b) maintain or restore habitat for other species that depend upon younger stands" in LSR areas is perverse to the plan's goal of protecting and enhancing old growth conditions and the species that depend on them. That quoted language should not be present in any final alternative.

12- I am concerned about loopholes caused by overly broad wording in all the alternatives (for both moist and dry stands). Such loopholes intentionally or unintentionally undermine the purpose of the plan. It's not that I believe the alternatives were written with intent to allow excessive harvest of old growth, but the loopholes that are present as written - and so they should be clarified in the final plan - could allow actions and harvests that undermine the intent of the plan and delay both the recovery of imperilled species and the eventual recovery of an industry for harvesting mature trees.

13- The attached picture is of a very large and vital old growth tree I discovered on Forest Service land in Siuslaw NF land that would be liable to be cut due to loopholes in the currently drafted alternatives. It is currently too important as both habitat and as a source of inspiration for humans to be cut down.

14- Language should be added to make clear that any loopholes that would allow removal of mature or old growth should not apply to those extremely old (over 300 years old, or over 36 inch dbh, or high structural complexity) trees.

15- Language that allows harvesting mature or old growth trees "for restoration" or "for reducing the risk of fire" is way too broad and should be removed. We would not want such language to be misinterpreted contrary to the intent to increase the amount of old stands and end up where such loose language allows too much harvesting.

16- The phrasing of allowing post-fire salvage logging "along existing system roads" is way too broad and could easily be interpreted by managers or harvest companies to be abused leading to unnecessary cutting that perverts the purpose of the plan.

17- I am concerned about large diameter, mature, and old growth trees within younger stand sales (in both moist and dry stands). First of all, they should be retained. They should be retained even if retaining them causes difficulty for logging other trees nearby or would create unsafe situations for logging personnel - in the latter case, enough younger trees should be left standing around any supposedly-dangerous tree so that logging personnel are not in any additional danger.

18- Secondly, a buffer of younger trees should be left around any large diameter, mature, or old growth trees within younger stand sales. This is because if only 1 or a few such trees are left standing they are highly likely to be blown over by strong winds in the few years after the rest of the forest was harvested, given that their roots and growth form were not established to be able to withstand such winds across their entire silhouette, rather than just in the crown with the surrounding forest slowing most of the wind. Such a buffer would likely also preclude the operational difficulties or safety hazards otherwise associated with working near large diameter/mature/old growth trees within younger stand sales.

19- Any alternative should clarify limitations on exceptions that allow logging of mature or older trees such that any exceptions are just that, the exception to the norm. Logging companies should report the number of large diameter, mature, and old growth trees removed from each stand or sale and those numbers should be monitored by federal staff. If more than 10%, say, of the large diameter, mature, and old growth trees present in that sale are removed, then the company removing them should be fined and/or barred from harvesting future sales and/or 0.5 acres per removed large diameter, mature, and old growth tree should be excluded from future federal timber sales and added to the LSR as compensation for the undesired loss.

20- I am concerned about imperiled species, especially the Marbled Murrelet, the Northern Spotted Owl, the coho salmon, the marten, and the red tree vole. Any alternative selected should include species-specific protections to make sure any logging of mature or old growth trees does not negatively impact their populations and reverse all investment that has been spent so far on their recoveries.

21- Surveys should always be required for threatened and endangered species prior to planning any sales in areas of potential habitat. State or federal ESA-protected species survey requirements should not be eliminated in any final alternative, as they would be in certain areas with alternative D.

22- In general, I oppose Alternative D.

Thank you,

Stephen Rossiter

ATTACHMENT-Figure/Picture: IMG_4784 x huge doug-fir on FS land ridgetop E of 4000C - Copy.JPG;
Photograph of person next to very large tree trunk.