

Data Submitted (UTC 11): 5/19/2023 9:50:07 PM

First name: Fergus

Last name: Mclean

Organization:

Title:

Comments: As a long-time member of the Southern Willamette Forest Collaborative and, before that, a public participant in the Jims Creek project, I commend the agency for a thoughtful and responsive approach to the unique characteristics of the upper Willamette mixed conifer forest- and for the leadership which recognized this special ecological zone and moved to protect and enhance it.

I also support much of the content of the Oregon Wild objection to the EIS, which takes a conservative viewpoint compared to the FS approach inevitably influenced by the need to meet agency goals for timber production. I object to the EIS on related grounds.

Specifically, Oregon Wild's argument that mature riparian forests provide necessary habitat for both spotted and barred owls is persuasive. Benefits of theoretical stimulation of riparian forest by thinning to promote eventual down wood- while significant- do not compare with the importance of preserving rare riparian forests where NSO & Barred Owl can co-exist.

Likewise, Oregon Wild's suggestion for ameliorating a landscape with thousands of acres thinned to precisely the same, drastic level of 30 TPA holds great merit; where residual pine and oak do not amount to 30 TPA double the remaining number of largest leave trees. This is a modest and virtually cost-free step which will provide a measure of resilience to blowdown events like that which reduced Jim's Creek density below target levels.

Not being familiar with the ins and outs of NSO management, I was surprised to see the EIS plans for impacting present and previous NSO nesting sites. While hard choices are inevitable when choosing between open and closed forest structures it seems wrong to intentionally degrade NSO populations for technically questionable other gains. Likewise, this 2021 article referenced by Oregon Wild draws conclusions regarding owl habitat and fire resilience which need to be addressed in the EIS:

Lesmeister et al. Fire Ecology (2021) 17:32

<https://doi.org/10.1186/s42408-021-00118-z>

to avoid what could be a costly mis-step.

Best regards,

Fergus Mclean