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Title: Conservation Principal

Comments: Dear Jacqueline Buchanan , USFS, Regional Forester for the Northwest Region -

Please accept the following comments from Benton Forest Coalition on the proposal to revise the Northwest Forest Plan. Benton Forest Coalition represents 200 citizens in and around Corvallis OR and has members throughout the Northwest.

We are deeply concerned with the failure of the Northwest Forest Plan to protect populations of older forest associated species. We recognize the difficulty in managing forests for a balance between resource extraction, recreation, clean air and water, carbon storage, and species habitat.

The Survey and Manage provision is designed to protect approximately 300 species threatened with extinction by commercial logging and climate change. As volunteer surveyors for red tree voles, category C on Survey and Manage, with 20 years experience, we are uniquely aware of threats to the existence of isolated populations within FS lands. I, and members of our organization, have surveyed in the following FS and BLM timber sales: Clark, Lois, Winberry, Turnridge, Straw Devil, Brush Creek, Nevergales, Pryor, East Devil, Moose Matrix, Blue River Face, Trapper, Green Mountain, Langdam, Hwy 46, Trout Creek, Flat Country, Quartzville Middle Santiam, Myrtle Creek, E. Fk of the Coquille, S. Deer Creek, Nails Creek, Lower Grave, Thin Lindsey, North Fork Overlook, Pickett, Rickard Creek, and Rickreall Creek.

Red tree voles are an indicator species for the health of forest ecosystems. The Forest Service finds suitable habitat for red tree voles analogous to habitat for northern spotted owls. Although the population decline for red tree voles may not be as precipitous as for the northern spotted owl, vole populations are diminishing every year, mostly due to a steady decrease in habitat. Besides fire, climate change, and predation by burgeoning barred owl populations, there are six more reasons red tree voles may not persist:

- 1) Zero protection on private lands.
- 2) The BLM is no longer required to survey for red tree voles before logging.
- 3) Both the Forest Service and the BLM routinely apply non-high priority status for voles in sixteen different watersheds in Oregon, in order to log their habitat.
- 4) Before logging, the Forest Service and BLM protect red tree vole nest sites only if harvest stands meet certain criteria (survey protocol). Otherwise they are logged even though voles may be present.
- 5) Red tree vole habitat is severely fragmented across the species' range. According to a recent study by leading scientists Forsman and Swingle, the average size of a red tree vole habitat block is just two percent of what it was one hundred years ago. This is particularly relevant in National Forests, where numerous patchworks of clearcuts and thinned stands are interspersed with older forest.
- 6) Even in islands of suitable habitat, vole populations may be spotty or nonexistent. In a survey effort by citizen surveyors in the Highway 46 sale near Breitenbush Hot Springs, 71 old growth trees were climbed and only one inactive nest was found. In a 2019 survey of a 173 acre unit of the Quartzville Middle Santiam project, out of 42 brokentops with cavities that were climbed, only three active nests were detected. In the Flat Country project, 40 trees were climbed before one inactive nest was discovered (personal communication).

Although red tree vole surveys indicate the presence of voles across much of their range, it must be recalled that surveys have only been required for a few decades, and are not reliable indicators of the rate of decline. Red tree vole habitat is virtually nonexistent on industrial forest lands. At the rate the Forest Service and BLM are eliminating red tree vole habitat on public lands, conditions across Western Oregon will eventually approach the level of rarity of suitable habitat that led USFWS to designate red tree voles as candidates for ESA listing in Oregon's North Coast.

The same factors contributing to the decline of red tree voles are affecting other species on Survey and Manage, i.e., the failure of surveys to detect isolated populations, the continual encroachment on species habitat by widespread commercial logging, and inadequate buffers when species are detected. In particular peril are inhabitants of two aged stands, younger forests with interspersed old growth trees. These two aged stands can perform the same ecological function as pure old growth, offering nesting substrates for cavity dwellers, and viable habitat for botanical species. Two species that we frequently encounter in the tops of scattered old growth trees in timber sales are northern flying squirrels and clouded salamanders. Studies reveal that flying squirrel populations are negatively impacted by aggressive thinning, and as a prey species for spotted owls, along with red tree voles, are an important part of the food chain.

We encourage the FS to implement more effective protections for Survey and Manage Species, to expand survey efforts before logging, mandate more extensive buffers when species are detected, and conserve corridors of suitable habitat between isolated populations, so that species can exchange genetics and adapt to changing climate conditions. For example, the FS currently has an elevation limit of 3500' for red tree vole survey contracts, but as volunteers we have documented viable populations in two Sweet Home sales above the elevation limit, Trout Creek and Quartzville Middle Santiam. Both populations were located in islands of older habitat surrounded by previous clearcuts.

We believe the FS should 1) limit the acreage of planned harvests to balance the need for enhanced carbon storage, and 2) abandon the practice of including mature harvest units within thinning projects planned for younger forests. In both of the sales mentioned above, the presence of red tree voles, and massive public opposition, led to the dropping of older harvest units of native forest from the sale. We also believe the FS should implement a diameter cut limit. We see mature trees logged in FS timber sales that in a few decades would qualify as old growth and offset the loss of habitat for species dependent on older forest. To that end, the FS should avoid the practice of falling snags and hazard trees, and instead draw buffers around them. We often see the allowance for cutting hazard trees abused by contractors to the detriment of cavity dwellers.

Thank You
Reed Wilson
Benton Forest Coalition