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RE: Comments on Draft Environmental Statement for Amendments to Land Management Plans to Address Old-Growth Forests across the National Forest System

On behalf of Umpqua Natural Leadership Science Hub (UNLSH), thank you for the opportunity to comment on the Amendments to Land Management Plans to Address Old-Growth Forests across the National Forest System. We are dedicated to providing exemplary natural science education experiences and leadership programs in rural Douglas County, Oregon. We educate, depend upon and care about our local ecosystems and especially our local and regional forest lands.

As President of UNLSH, I will provide comments for our organization having a professional background in wildlife ecology and having worked in the Forests of the Pacific Northwest for 44 years. I also teach natural resource science classes at our local college. Reflecting upon our rural dependency upon intact forest ecosystems and their current logged over conditions along with the existential threat of climate change our forests need to be returned to a functional state which definitely includes protecting the remaining old forest and mature forest from commercial timber extraction and fuels treatment manipulations that are harming more than they are protecting. It also means managing the entire system towards the pre-commercial logging historical conditions that once fully functioned to sequester and store carbon, capture and store our water resource, and provide local microclimate conditions that cool and humidify the landscape as the old growth and mature forests once did here in Southwest Oregon in my lifetime. For an example, Riddle, Oregon, one of our local communities that we have partnered with as an organization, used to have plenty of water to serve their needs. Now instead of having 500 gallons/minute to meet their needs after the extensive logging and roading that has occurred in the past 30 years in the watershed they depend upon they only have 250 to 300 gallons per minute if everything goes right.

In review of the DEIS it is concerning that principles and processes that catch and store water and carbon and provide critical habitat to keep as much biological diversity as is possible are not effectively being applied and addressed in the alternatives. The preferred alternative is too limited in scope to achieve the purpose and need. There are too many loopholes in the direction as it currently written even for Alternative 3 which is the better of the options to have any confidence that the goals will be achieved. Confidence and public trust is crucial to this proposed action. The concerns of the public and a good hard look especially at the science in the EIS process for a sound approach to forest conservation are missing compared to the input from the public in the scoping process. Direction needs to be more protective and effective criteria is needed to compare alternatives to ensure old and mature forests and trees are protected in all 120 plus Forests across the country.

This issue of not taking a hard look seems to be in part due to a continued disconnect in regards to the holistic functioning of all of the vegetation and structure in an old growth forest stand. I say this because of the kinds of fuels treatments and thinning I have observed conducted on the ground in these stands. Such treatments cause more harm than good opening up the stands to drying and drought impacts, changing the vegetation that comes back due to things like the pile burning damage causing pocks of impacted soils as well as ignoring the symbiotic interconnected relationships between the understory plants and fungi with the trees. The science often gets cherry picked towards a stand manipulation treatment and therefore does not use the best available science. This is why it must be directed in Alternative 3 which should be the selected Alternative with modifications including no fuels vegetation or thinning treatments should occur in these stands unless it undergoes an effective system of checks and balances through an independent science panel review and reporting process. Further, no mature or old trees should be removed even if they must be felled for some safety rationale.

Here in SW Oregon where fires are historically mixed severity too many treatments have been proposed under the premise that the forests are "dry" when they are not. The premise that facilitates these "dry forest" treatments are not well evidenced or effectual . Further it opens up the stands to more disturbances (personally measured) and drying rather than allowing them to respond on their own. Evidence has shown over and over in studies of current and past fires that these Old Forest Stands are not outside their natural range of conditions and should be left alone.

The issues here are with people, plantations and roads. These 3 factors are causing severe fires. People are the primary fire source (cause), plantations have been shown to cause high severity fires and roads create dry microclimates and bring in insects readily to stands as was directly observed during the heat dome in June of 2021 in Oregon. These are just more substantive reasons to protect all mature and old forest stands. Alternative 3 should be selected and should also include the 47% mature forests as they are critical to support the overall purpose and need.

Protecting the 47% mature forest from commercial logging is critical to address climate change and the reality of the current ecological conditions on the affected landscapes. This moves towards a systematic versus symptomatic approach as is needed and is a foundational principle. Proportionately the response of forest recovery described in the DEIS Alternatives to function for the goods and services needed by our public forests seems far off from what current science tells us we need. Looking at Old Growth alone doesn't work to address the existential crisis we are in in terms of climate, biodiversity and extinction. The DEIS needs to take a closer

look and consider the full effects to forest ecosystems, private and public cumulatively in addressing how the purpose and need will be effectively met.

For Example: There has to be enough old growth forests and mature forests in landscapes so as to not have to be concerned about disturbance processes in ecosystems. This is simply applying basic landscape ecology and island biogeography. As Jack Ward Thomas stated in the directions in developing the Northwest Forest Plan in regards to old growth dependent species , areas functioning for habitat (an in this case all ecological functions including carbon storage and water conservation) have to be large enough to incorporate disturbance processes. That is what climate adaptation needs to address. There has to be recognition as to the need to protect the integrity of all the mature and old forest we have left as considering the cumulative impacts of private forest lands and current public land conditions it is absolutely y clear all old forest and mature forest on public and is needed to remain intact and contribute to the key ecological processes they do when allowed to fully cycle.

While here in the PNW the Northwest Forest Plan made strides in improving conditions through protection of some areas of forest and riparian reserves, the evidence is clear that too much logging and roads has occurred and the agency has failed to meet its mandate to maintain a functioning system with the ecological services we all depend upon.

Case in point I personally suffer as do many in my area and as do the salmon, from continued loss of stream flow in the summer to grow our food. Our water comes from the forest and this is a critical part of our "economy" self-determination, independence and health. Sixty years of flow monitoring in experimental forests (Perry, 2016) where logging occurred shows that the resulting young plantations on the landscape causes up to 50% loss of summer flows (versus intact, un-thinned mature/old forests >70 years). Then we (and the salmon) suffer too much flow in the winter with increased peak flows by another 50% which is due to the road infrastructure to manage for logging along with removal of the trees and forest vegetation in the act of logging.

We need more intact old and mature forest on our landscapes to address many issues. My home while not in a forest is now becoming too expensive to insure due to fire risk caused by logging and the resulting changed landscape from predominance of old growth and mature forest to droughty dense plantations of small diameter trees with roads everywhere. Most fires are human caused and too little has been done to remove roads even though they are too expensive to maintain, and cause extensive impacts including in the response zones outside forest service lands. Desiring to maintain management of mature forests just adds to the desire to keep roads that should be removed to restore ecosystem function and reduce human caused fires which are far more the problem than lightning caused fires. Further the public cannot afford to maintain all of the roads and the government has not.

As stated by associate Ernie Niemi, Natural Resource Economist, research has shown that "timber dependent communities" like the one UNLSH is in, has higher unemployment, lowest income, more poverty, less education, lower birth rates, higher death rates, poorer health care and more. This is a matter of environmental justice. We, in this rural community are directly, indirectly and cumulatively suffering the costs of the paradigm of "adaptive management". This kind of approach has proven very costly. I am well aware of the costs of putting logs back into streams, removing invasive species from wetlands developed for fishing recreation, wildland fire suppression mainly for timber protection, and roads that cause lots of damage directly or indirectly. Symptomatic agricultural

approaches to public forest management rather than a systematic and precautionary approach is costing us all. In considering not just the costs of logging to our communities overall we ask to do a better job of considering the economic values of conserving these forests to the extent that they fully function not simply as museum pieces that will be threatened by the very nature that forests are cyclic. We know that when they burn they are as valuable as dead trees and key in every aspect of effectively renewing the forest and carbon storage.

Much of the public land landscape management to date in conjunction with private timber land destruction of forests is far out of whack from the functional amount of old growth and mature forest that cycled on the landscapes keeping the forests functioning for all the goods, services and critical climate conditions they provide. This is why we are concerned that the proposal does not go far enough. We cannot afford too little too late. Given the climate emergency and the biodiversity emergency as species pile up on the list to be lost in the 6th great extinction event or never function ecologically as they once did, the agency needs to protect all mature and old growth forest, and all forest acres that have components of old growth that can contribute to developing future functional forests again. It does no good to take a patchwork approach back out of the mess that we are in.

The alternatives 1-4 prepared by the agency to respond to the scoping comments simply are not truly responsive to the real purpose and need. Alternative 3 with some modifications as recommended in this document will go much further to meeting the purpose and need.

Case in point in regards to vegetation management options "fuels" treatments which do more harm than good. I leave you with an example easily viewed at Woodruff Bridge Day use area versus Union Creek Campground on the Rogue River National Forest. The forest cut down all of the amazing functional understory, piled in in many piles, put black plastic on top of it and will be burning the piles (with the plastic - been there done that). This piling and burning (many piles) will cause major soil damage and a huge loss of an amazing variety of understory vegetation species that were part a parcel with the old trees as the area will be pock marked with these burned spots and the vegetation that grows back when it does will not be the same and will invite invasive species as well. Ironically the area is also in a riparian reserve and is an example of the many ways in which the agency did not and often does not follow good practices when the decision is theirs at the local level. These approaches are totally the wrong thing to do as it opens up the stand increasing wind and drying therefore loss of the moister microclimate and without a full understanding of the supportive interrelationships between the old growth trees and the understory trees and vegetation such as Pacific Yew.

Leaving management open to loopholes of vegetation management activities has proven to be a failure more often than not over and over and is costly in the long run. I have 20 years of USFS experience to come to this conclusion.

In fact, entire forest ecosystems are endangered given all of the current conditions and continued logging. A piecemeal approach of addressing only old forest stands falls back on the agricultural paradigms that is failing.

When I say endangered I mean that from an ecological standpoint the agency has allowed so much loss of composition, and structure that from an ecological standpoint the forests are not able to function.

Public forests entrusted in the USDA, US Forest Service are on their way to ecological extinction. This is because the agency from its beginning has continuously used false paradigms and bias pseudoscience due to political pressure from the corporate players, politicians and internal employees who are the only entities benefiting. As a result the composition, structure and functions of forests have been adversely impacted. These forests are critical as intact ecosystems for the good of all people not just the few. Now is the time to move them in the right direction.