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Comments: To: Regional Foresters Jacque Buchanan and Jennifer Eberlien

Public comment submission on the Northwest Forest Plan Draft Environmental Impact Statement

Personal background. My name is Theo Dreher and I have lived in Corvallis, Oregon, since 1987. I have recently been President of the Oregon Lakes Association (OLA), through which I have advocated on behalf of lakes in natural areas, as well as for better public health protections against potentially toxic cyanobacterial blooms. OLA was a supporter of designating Crater Lake and Waldo Lake (which fall within the NWFP area) as Outstanding Oregon Resource Waters, affording them a layer of protection. I am also an active member of Great Old Broads for Wilderness, and in the last two summers I participated in wilderness solitude monitoring and an assessment of human impacts in the Diamond Peak and Middle Santiam Wildernesses. My wife and I volunteer for the Corvallis to the Coast (C2C) Trail and have adopted for maintenance a trail segment that is located in the Siuslaw NF near Marys Peak, Oregon.

Importance of old growth trees and forests. I regularly participate in outdoor recreation of various types and have been in many parts of the area covered by the NWFP in Oregon, Washington, and California. For all of my life, I have found that regular periods of physical activity in wild country (hiking, running, cycling, skiing, primitive camping), particularly in forests and alpine areas, are important for my psychological and emotional well-being. As a scientist and keen gardener, I take great interest and joy in experiencing nature in its many beautiful and inspiring forms. Conversely, I am upset when I come across needless destruction of wild country. I put the logging of old growth into that category. In the 70 years of my life, I have seen huge declines in so many species that have come as a result of human activities, activities that are not in synch with nature and therefore not sustainable. Old growth forests, truly majestic and massive ancient trees, fall into that group of declining nature. I believe strongly that we must protect the remaining old growth and am truly grateful for the ability of the NWFP to arrest old growth loss from all but uncontrollable fire since 1992. That success is clearly stated in the 2018 Synthesis of Science and 2020 NWFP Regional Assessment documents. I am distressed that the Draft EIS has effectively introduced a redefinition of old growth to propose raising the age limit for logging from 80 to 120 years in moist forests, and to refer to trees in the moist PNW forests as YOUNG if they are younger than 120 years old (page ES-8, Draft EIS).

With regard to this issue, I find the proposed actions under Alternatives B&D to move too far in the direction of permitting logging of older trees (80-120 years old in the moist forests). I am concerned that the acknowledged success of current management would be lost in too large a shift to address the shortfall of timber harvesting relative to 1992 NWFP projections. Those successes, outlined in the 2018 and 2020 documents cited above include: reversing the losses of old growth stands; decreasing stream temperatures to healthier levels in response to greater shading from the canopy (see Chapter 3, 2020 Assessment); provision of habitat with large fallen trees that are important for mammalian carnivores that are valuable in the ecosystem but generally at risk (~pp. 990&991, 2018 Synthesis of Science). I understand two drivers for changing away from the 80-year-old limit in moist forests: (a) the worry/prediction that these forests are susceptible to rare but intense fires and the conviction that management can make them more fire-resilient and thereby prevent long-term old-growth

loss; (b) the pressure to allow more logging.

(a) Comments on the proposal to allow thinning in mature stands by logging 80-120 year old trees. It is acknowledged that this action would temporarily put the forest in a less desirable state until the remaining trees again fill the canopy upon the accelerated growth made possible by removal of trees competing for resources. It is not explained how long this less-desirable transitional state would last, but it likely is a decade or two. During that entire period, the previously closed forest canopy would be opened to some degree, allowing sun and wind to dry out the undergrowth (itself growth-stimulated by increased sunlight). This would raise ground temperatures and accelerate drying, in fact driving the forest TOWARDS fire sensitivity. During ~100F days in the summer of 2023, I camped in the Middle Santiam Wilderness in the Cascade foothills east of Salem. It was remarkable how cool and fresh it felt under the thick canopy of trees, where the temperature was much less than 100F. I am worried by another aspect of the proposed thinning, which would almost always be mechanical. Where I have seen this in action (near Mt Hood, and outside the NWFP area in NE Oregon and near Lake Tahoe), the amount of physical disruption on the forest floor is staggering. The disruption of understory, invertebrates, small mammals, soil fungi and other biota must be very serious; the risk of bringing in invasives, including soil-borne diseases on machinery, is serious. I do not support a widespread adoption of these extreme mechanical techniques in forests that we are viewing as the areas dedicated to preserving mature/old growth forest ecosystems. Please take full consideration of public sentiment, which does not support old growth harvesting (p. 131, 2018 Synthesis of Science), and we should not redefine old growth from an 80- to 120-year-old threshold as a work-around.

(b) Comments on increasing logging. As the 2018 and 2020 documents report, decreases in logging are not only due to restricted supply but many other issues. Losses in jobs in the timber industry cannot only be blamed on NWFP policies. Although the number of mills in the NWFP has decreased since 1992, the milling capacity has remained steady (p.13, 2020 Assessment). Mechanization and modernization in the industry has been a major factor in job losses. Timber has generated $39M annually in the NWFP area, while sustainable recreation has brought a far larger value, $613M annually, to local communities. There is also substantial value in non-timber forest products: "at least $1.4 billion dollars, with much of that coming from the NWFP socio-economic region" (p. 3-128, Draft EIS). These products are harvested with far less impact than logging. Clearly, from an economic point of view, logging is not so valuable ad should no be allowed to override important ecological concerns. The increased logging would also impact the carbon storage (climate-protecting) effects of the PNW moist forests. C is most effectively stored in older trees. The great importance of the NWFP region in providing carbon storage is made abundantly clear in Fig. 1.4, p. 15, 2020 Assessment.

My comments have mostly been directed at the moist forest regions where I have experience. I support similar preservation of old trees and tree stands in the dryer forests, but understand and applaud the proposal to differentiate more clearly the management of moist and dry forests. I am very concerned, however, at placing the threshold for protection in dry forests at 150 years. With slower growth rates in dry regions, surely we should be making every effort to keep trees of advanced age and not use a higher age threshold for protection. Alternative D, allowing logging of trees up to 175 years old is outrageous. I also applaud the proposals to incorporate Tribes and tribal practices into NWFP forest management.

Thank you for considering my comments.

Theo Dreher

Corvallis, Oregon

IN-TEXY CITATIONS: 2018 Synthesis of Science and 2020 NWFP Regional Assessment documents; 2020 NWFP Regional Assessment documents