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Comments: The science cited by Dr. Bernard Bormann and his extensive experience must be noted. Not only for all his comments, but also for his specific direction pertaining to red alder. (see his suggestions below as excerpted by permission from his submission)

Background: The Washington Hardwoods Commission was created by the legislature in 1991 to promote the hardwood industry in Washington. For the first decade or so alder lumber production was robust. But since 2005, production of kiln-dried lumber has dropped 70% because of restricted hardwood harvest. Eight mills have shut down, leaving only 5 producing mills. 550 jobs have been lost due to mill closures and cutbacks to single shifts. Alder needs to be part of the Northwest Forest Plan, not only for the science cited by Dr. Bormann, but also for its specific geographical growth area. Red Alder only grows in a narrow band West of the Cascades from Southern Canada, through Washington and Oregon to Northern California.

Dave Sweitzer has been the executive director since 1991. I am not a forester or scientist so I rely on those who are for guidance. I believe that incorporating Red Alder into the "Plan" makes scientific and economic sense.

Excerpted from Dr Bernard Bormann's submission to the Northwest Forest Plan Amendment #64745

"What's needed is a managed early-seral period after fire with species like red alder before jumping straight to pure Douglas-fir.

The NW Forest Plan was largely responsible for a sharp decline in the PNW red alder economy, by choosing not to allow harvest of alder in both upland and riparian stands. This is especially unfortunate in that alder mills employ many more people per unit volume, given its high value-added products than conifer stud mills. The failure to grow alder as a key early-seral species in areas with degraded soils and in riparian buffers, has also resulted in major losses of soil productivity and carbon-sequestration potential where soils were not restored to pre-fire conditions. Losses of aquatic productivity, where dense plantation conifers dominate riparian buffers, are also very likely on wetter portions of the Plan area. Aquatic trophic productivity

models project that fish populations are limited by a low-quality litter in dark conifer-dominated reaches on the Olympic Peninsula (ms. in prep.). Research on the 2020 Labor Day fires also strongly suggests that alder can act as a fire dampening agent (Coble et al. 2023). In our work on the Willamette NF, part of the Holiday Farm fire southern perimeter was a series of 25-year-old experimental stands with mixed alder and Douglas-fir Forest experimental units, while pure Douglas-fir in our other units and in the nearby Weyerhaeuser Tree Farm were almost entirely consumed. Perhaps the biggest concern is that without a change in alder policy, losses of alder mill infrastructure will soon preclude alder management across perhaps the entire Plan area. For example, the Port Angeles Hardwoods mill is now fully dependent on imported alder logs. The Amendment could better promote regeneration harvesting of older upland and riparian alder, planting alder after wildfire and on soils degraded by previous intense fires."