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Comments: I am writing to provide comments on the Draft Environmental Impact Statement (DEIS) for the Siuslaw National Forest (SNF). I appreciate the Forest Service's ongoing efforts to address climate change and ecological management; however, I believe there are several key areas in which the DEIS requires revision to better reflect the ecological realities of the region, promote sustainable forest management, and prioritize the long-term health of the forest ecosystems.

1. Incorporation of Ecological Science in Forest Management

The DEIS must better incorporate the best available science on the unique wet and rainforest life zones of the Siuslaw National Forest. It is imperative that forest management zones are mapped at the landscape scale, incorporating metrics like plant association zones and mean annual increment data. Decisions should be based on sound ecological science and not be made arbitrarily at the stand or project level. This approach will support more effective long-term forest management strategies.

2. Recognition of Forest Biomass and Carbon Sequestration

I applaud the inclusion of climate change considerations in the DEIS but urge the Forest Service to take a deeper look at the potential for carbon sequestration in the Siuslaw National Forest's moist, wet, and rainforest zones. These areas are vital carbon sinks, and forest management strategies should prioritize the retention and growth of mature forests to maximize their role in sequestering atmospheric CO₂. The DEIS must fully acknowledge the world-class potential of these forests to store carbon, particularly in the context of the climate emergency we are facing.

3. Past Forest Management and Ecological Consequences

The DEIS fails to adequately assess the long-term ecological impacts of past forest management practices, including clearcutting (1945-1995) and plantation thinning (1995-present). These practices have significantly altered hydrology, fire regimes, and biodiversity within the Siuslaw National Forest. The DEIS must include updated scientific research on the ecological consequences of past removals, such as their contribution to low summer stream flows, changes in fire dynamics, and the disruption of natural forest structures. The analysis should consider the role of climate change in exacerbating these issues.

4. Wildfire Resistance vs. Resilience

I strongly support Option-B's general position on fuel load reduction, especially in moist, wet, and rainforest zones, where such strategies are unwarranted. The focus should be on wildfire resistance, not just resilience. Forest thinning should be done in a way that preserves at least 75% canopy cover post-thinning, as this is critical for wildfire resistance and maintaining the integrity of wildfire refugia. Thinning should aim to reduce vulnerability to fire while ensuring that forests remain healthy and capable of supporting biodiversity and carbon sequestration.

5. Non-Commercial Thinning and Forest Service Funding

I urge the Forest Service to replace commercial forest thinning with non-commercial thinning funded through Forest Service budgets. This approach should prioritize ecological restoration, wildfire resistance, and biodiversity over commercial interests. By eliminating the commercial aspect of thinning, we can ensure that thinning efforts align with the goal of maintaining forest health and resilience, rather than focusing on short-term economic gain.

6. Public Access and Recreation

It is essential that the DEIS includes plans to improve infrastructure and enhance public access to the Siuslaw

National Forest, especially for dispersed recreational activities. The current road system limits access to many areas of the forest, especially for those without high-clearance vehicles. The public should feel welcomed to visit and explore the interior of the forest. Infrastructure improvements that allow for safe, responsible public access will promote greater engagement with the forest and enhance the public's connection to this vital natural resource.

7. Protection of Late Successional Reserves (LSRs)

While I applaud the Forest Service's commitment to maintaining Late Successional Reserves (LSRs), I strongly oppose any future commercial timber harvest within these areas. The harvest of naturally regenerated stands in LSRs, particularly those up to 119 years old, would be detrimental to the integrity of these reserves. LSRs are essential for the preservation of late-successional and old-growth habitats, and commercial logging should not be allowed in these areas. Any proposal to harvest timber in LSRs is likely to face significant public opposition and would undermine the goals of ecological preservation.

8. Climate Change and Urgency

As we face a global climate crisis, the DEIS must reflect the urgent need for forest management strategies that address the rapidly changing climate. The DEIS's climate analysis appears to be outdated and does not adequately account for the accelerating impacts of climate change on the Siuslaw National Forest. Current climate models suggest that the impacts of warming and changing precipitation patterns will occur sooner than previously anticipated. I encourage the Forest Service to update the climate analysis to reflect the latest scientific research, including the growing risks associated with climate change in this region.

9. Collaborative Management with Tribes

The involvement of indigenous tribes in fire management and forest stewardship is essential. Tribes have a deep understanding of forest ecosystems and fire management practices that have been developed over thousands of years. I encourage the Forest Service to consult with relevant tribes to incorporate their traditional ecological knowledge and practices into fire management strategies in wet and rainforest zones.

Thank you for your consideration of these comments. I look forward to seeing an updated DEIS that reflects the urgent need for effective, science-based forest management.

I endorse the Coast Range Association's (CRA) comments on the DEIS. Please fully consider the CRA's comments.