

Data Submitted (UTC 11): 3/18/2025 3:54:43 AM

First name: Jennifer

Last name: Rothe

Organization:

Title:

Comments: To whom it may concern,

My name is Jennifer Rothe. I currently live in Eleele, HI, but I spent four years living and working along the Oregon Coast and the Siuslaw National Forest. I have long realized the significance that old forests held for our country, but my time in Oregon solidified my conviction that we have a duty to manage them well for posterity (i.e., on a time scale viewed on hundreds of years, not just the next five or ten). I have included numbered points below.

1- None of the alternatives are sufficient to adequately protect old growth trees and old growth forests. Mature trees should be protected from being harvested, and old-growth trees are especially vital. We should be allowing more forest acres to recruit into older age classes.

2- Old growth trees impart value wherever they are, not just in a few protected stands where overcrowding of tourists is a concern. Though these majestic stands of course inspire awe, that feeling is every bit as valid whenever one happens across a spectacularly old stand (or even individual trees) in less-known places. One of the things that truly makes America great is that we are a nation spanning a large geographical area where it is still possible to get away from the modern world and see the land and ecosystems much like they used to be.

3- Statistics which state that there are thousands of acres of mature/ old growth (>200 years) do not properly weight the importance of exceptionally old/ high dbh/ structurally complex trees. These should be protected before all else.

4- We should not be harvesting any of these exceptionally old trees. If we had wanted to create a sustainable old-growth harvest strategy, the time to have done that has already come and gone decades ago. If we want to create an ability to harvest old timber, we should plan for that now with an eye on the long-term. Cutting down all of the oldest, biggest trees will only provide short-term gain. We should be putting plans in places to have long-term rotations (such as 400 years, wherein 1/400th of the affected area is harvested in any given year).

5- The final version should clarify that any specification for output of board feet per year should not be met by dipping into mature forests, and especially not old growth. It is better to fail to meet production quota than to resort to harvesting old growth trees.

6- I support increased collaboration with tribal governance as described in alternatives B/C/D.

7- Prescribed burns can be useful wildfire prevention tools. The benefit of logging as the only/ best fire suppression tool is overstated.

8- Young forests should be defined as 110 years or less, not 120 years as stated. Defining them as 120 years goes against what was written in the original NWFP (i.e., 40 years have been added to the proposed definitions of mature/ old growth when only 30 years have passed since its adoption).

9- Stand age should continue to define which category a stand is part of. Defining stands as harvestable or not based on their establishment dates rather than by their current age could lead to them being harvested even though they should technically be too old.

10- Riparian buffers should be increased as they protect salmon habitat as well as provide wildlife corridors

through what is otherwise a patchy landscape.

11- Any alternative that allows logging to "(b) maintain or restore habitat for other species that depend upon younger stands" in LSR areas is antithetical to the plan's goal of protecting and enhancing old growth conditions and the species that depend on them. The language in (b) should be absent in any final alternative.

12- The wording is often too broad in all alternatives (for both moist and dry stand), which provides for too many loopholes, which can unintentionally (or otherwise) undermine the purpose of the plan.

13- During the course of my work in Oregon I happened across multiple exceptional trees which would be liable to be cut due to loopholes in the current alternatives. Each discovery was not only an inspiration at the time, but also represented potential to house rare old-growth species.

14- Language should be added to make clear that any loopholes that would allow removal of mature or old growth should not apply to those extremely old (over 300 years old, or over 36 inch dbh, or high structural complexity) trees.

15- Remove language that allows harvesting mature or old growth trees "for restoration" or "for reducing the risk of fire." This is way too broad and likely to be abused.

16- The current phrasing of allowing post-fire salvage logging "along existing system roads" is also too broad. This could also be abused to undermine the purpose of the plan.

17- Large diameter, mature, and old growth trees within younger stand sales (in both moist and dry stands) should be retained even if it causes difficulty for logging other trees nearby. In the event of a safety issue for logging personnel, this should be mitigated by leaving enough younger trees standing around any potentially dangerous tree.

18- A buffer area of younger tree should also be left around any large diameter, mature, or old growth trees within younger stand sales. If only the oldest tree is left, that creates a windthrow hazard to the remaining old tree.

19- Exceptions to the limitations should remain just that: rare exceptions. Logging companies should be required to report the number of large diameter, mature, and old growth trees removed from each stand or sale and those numbers should be monitored by federal staff. Punishments should include hefty fines and/ or barring them from harvesting future sales in such a way as to compensate for the undesired loss.

20- I am particularly concerned about imperiled species, especially the Marbled Murrelet, the Northern Spotted Owl, the coho salmon, pine marten, and the red tree vole. The chosen alternative should absolutely include species-specific protections to make sure any logging of mature or old growth trees does not negatively impact their populations and reverse all investment that has been spent so far on their recoveries.

21- Surveys for threatened/ endangered species should always be included prior to any timber sale in an area of potential habitat. Thus alternative D is particularly dangerous.

22- I vehemently oppose Alternative D.

Thank you,
Jennifer Rothe