

COMMENT LETTER: NATIONAL OLD GROWTH PROPOSAL

Thank you for accepting my comments regarding the Forest Service's proposed amendment to 128 national forest land management plans to protect old growth. This is a unique opportunity for the Forest Service to increase the pace and scale of active management. Active management will improve forest health and resiliency to wildfire, insects, and disease which are the greatest threat to mature and old growth forests in our national forests¹.

This is a complicated, diverse issue that needs to be implemented on a local scale. Major forest policy decisions should be accomplished through robust local engagement and public participation, not through a top-down directive from Washington, D.C. Our national forests are dynamic systems, not static. They are also geographically and ecologically unique and require different approaches based on local conditions. The Forest Service, and the public, would be better served through individual plan revisions and amendments at the Regional and forest levels.

The Forest Service has determined that the most significant threat to old growth is wildfire, insects, and disease. So, any national forest amendment process for old growth should focus on increasing science-based, active forest management to address our wildfire crisis, and to make our forests healthier and more resilient. Forest stands adjacent to old growth should be prioritized for management to reduce risk.

Many mature and old growth forest stands are inside wilderness areas and are at increased risk of loss due to fire, insects, and disease. If we want to preserve these valuable old growth stands, we need to allow management in adjacent wilderness stands to create fuel breaks and reduce insect and disease prevalence.

Areas identified with high mill capacity and high threat should be prioritized for treatment to adjacent stands to reduce risk to old growth forests. Areas with high housing growth and high threat from fire deficits should also be prioritized for adjacent thinning treatments to protect old growth, reduce wildfire risk, and reduce catastrophic impacts from wildfire to communities.

The Forest Service has set an ambitious goal of expanding active management to reduce the threat of wildfire through its Wildfire Crisis Strategy. The agency should publicly document and clarify how this national amendment will assist the agency in achieving its Wildfire Crisis Strategy goals. While the NOI mentions the need to reduce fuel loads near communities and the Wildland Urban Interface (WUI), most wildfires ignite and spread in the backcountry directly threatening old growth forests. This requires the Forest Service to focus on forest health and wildfire resiliency across the landscape and on the most fire-prone areas.

Protecting old growth forests requires action. I urge the Forest Service to describe and recommend, in detail, what specific actions it must take to achieve the agency's stated goals.

Sincerely,

Halli Hemingway

Forestry/GIS Analyst

¹ November 2023 Mature and Old-growth Forest Threat Analysis Update