

**LINCOLN COUNTY**

**STATE OF MONTANA**

BRENT TESKE, COMMISSIONER  
DISTRICT NO. 1, LIBBY

JIM HAMMONS, COMMISSIONER  
DISTRICT NO. 2, TROY

JOSH LETCHER, COMMISSIONER  
DISTRICT NO. 3, EUREKA

CORRINA L. BROWN  
CLERK OF THE BOARD AND COUNTY RECORDER

February 1, 2024

RE: National Old Growth Forest Plan Amendment EIS Notice of Intent

Hello,

Thank you for the opportunity to comment on the Forest Service's proposed amendment to the national forest land management plans of 128 forests to protect old growth through a single Environmental Impact Statement. This proposed action has serious flaws that could result in negative impacts to old growth.

The Federal Registry language, dated December 20, 2023, page 88043, states that the "proposed amendment is intended to create a consistent approach to management of old-growth forest conditions with sufficient distribution, abundance and ecological integrity (composition, structure, function, connectivity) to be persistent over the long term, in the context of climate amplified stressors."

Diverse and complex ecosystems, including old-growth ecosystems by their nature cannot be addressed in terms like standardization and consistency. On page 88043 it states, "mature forest conditions had not previously been ecologically defined in a consistent manner at a national scale." Old growth conditions SHOULD NOT BE defined in a consistent manner or on a national scale. Forest ecologists in the past have opposed such efforts, recognizing the breadth of conditions that provide old growth habitat. Existence of old growth is influenced by factors including tree species, habitat type, moisture availability, winter and summer temperatures, aspect, slope, wind, soil types and soil organisms, insect population dynamics, disease, past and current forest management practices, fire regimes and many other factors. These ecosystems are dynamic and can change and do change organically, and also through human actions. A national plan cannot take all these unique factors into account.

To incorporate effects of climate change on old growth will require a crystal ball by the developers of the proposed land management plan. Plans have their limits and to be nimble in responding to changes in the environment the closer you are to the area affected, the better you can respond. A national plan will fail to

address site specific needs and will be cumbersome, limited, constrictive and slow to address any needed modifications. The limitations of the national plan has real potential to negatively impact old growth.

The Kootenai National Forest in Region One has used the robust old growth study of Green et.al. 1992 (errata corrected 2011) over the past three decades to address old growth in our forest types. It addresses our unique forest conditions. For years the pacific coast old growth definitions were extrapolated to define and characterize old growth in the forest of the Inland Northwest. It would appear that the Forest Service is taking steps backward by proposing this nationwide plan amendment.

A top-down approach from Washington cannot address the uniqueness of our forests. It is a heavy-handed approach that undermines public trust and questions our national forest's ability to manage, which is their job. Any changes to forest plans should be done through local and public engagement using science that is specific to those unique systems on individual forests. Much of what is being proposed in the NOI can be addressed through guidelines, objectives and directives.

As stated in the register, the Forest Service has determined that the most significant threat to old growth is wildfire, insects, and disease. These threats can only be addressed through changes in forest conditions. Increased pace and scale of forest treatments can and will benefit old growth by reducing wildfire threat and making our forests healthier and more resilient.

Old growth systems don't lend themselves to quick fixes. Likewise, Forest Service NEPA processes have never been known to be quick fixes. A plan to amend 128 forest plans by way of an EIS in a year's time is unrealistic and will delay important forest management and open projects up to more litigation.

The Forest Service would be wise to keep their focus on reducing the threat of wildfire, including fuel reduction treatments in old growth, and educating the public on the importance of fuel reduction and forest management in the protection of old growth. Using these efforts would achieve a variety of results including protecting old growth while protecting communities and infrastructure. To throw in a new element to be analyzed, and carried through the arduous NEPA process will slow the agency's ability to increase pace and scale of fuel reduction treatments and to reduce wildfire threats.

Sincerely,



Josh Letcher



Brent Teske



Jim Hammons