

NORTH FORK PRESERVATION ASSOCIATION

77 Moose Creek Rd, Polebridge, MT 59928

The North Fork Preservation Association (NFPA) is a nonprofit conservation organization based in Polebridge, Montana. The NFPA mission is to to champion the exceptional biodiversity and wildness of the North Fork of the Flathead River watershed in Northwest Montana. As a grassroots, landowner driven organization, we have strong investment and knowledge of the areas being evaluated. We have participated in the forest planning processes on our local national forest, the Flathead National Forest. We now appreciate the current opportunity to comment on the National Old-Growth Amendment (NOGA) which is being proposed by the United States Forest Service (USFS) in response to President Biden's Executive Order 14072.

Protection of old-growth and mature forests in public lands should be a paramount priority in an era of climate change and biodiversity loss. As such, the primary goal of NOGA should be to retain and increase old-growth as well as mature forests which are the old-growth of the future.

The current Draft Environmental Impact Statement (EIS) offers several action alternatives and indicates that the preferred alternative is Alternative 2. The NFPA favors a more restrictive alternative, Alternative 3. We feel there should be a more definitive approach regarding logging priorities and a clear prohibition on cutting old-growth. In particular, we encourage a policy of proactive stewardship

in old-growth forests that shall specifically not result in commercial timber harvest.

Imperative to an effective NOGA will be the requirement of a rigorous monitoring program based on accurate cataloging of old-growth stands on individual forests. This should include required baseline ground truthing of current stands.

The final NOGA stewardship priorities also should be inclusive of Tribal and Indigenous knowledge of forest management and cultural values.

Currently there are multiple proposals by USFS in the state of Montana that would allow logging of old growth in our national forests. A strong NOGA will mandate more thoughtful stewardship of these critical forests. The NFPA applauds the Biden Administration for its leadership in addressing climate change and biodiversity.

Sincerely,

A handwritten signature in cursive script that reads "Flannery Coats Freund". The signature is written in black ink and is positioned above the typed name.

Flannery Coats Freund
President, NFPA