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September 19, 2024

Re: Amendments to Land Management Plans to Address Old-growth forests Across the National Forest System

Dear USFS Colleagues,

Please let me open with a heartfelt “thank you” for the enormous amount of work and thought that went into this NOGA DEIS. I am almost daily impressed with the dedication to our nations’ forests demonstrated by employees of the USFS. Please accept these comments, offered in the spirit of respect and collegiality, on the NOGA DEIS as my personal public comment.

My name is Dr. Michael Paul Nelson, and I am a Professor of Philosophy and Environmental Ethics, as well as the director of the Center for the Future of Forests and Society, at Oregon State University. I am an intensely interdisciplinary scholar and have been engaged in the philosophical and ethical dimensions of natural resources for nearly 35 years. Along the way, I have published ~250 professional articles and essays and 4 books on a wide variety of topics within natural resources, climate change, wilderness, forestry, Indigenous Knowledge (IK), and beyond. Some of my relevant recent publications include the USFS commissioned [Braiding Indigenous and Western Knowledge for Climate-Adapted Forests: An Ecocultural State of Science Report](#), and an essay on rules for defining old-growth forests: “[The perilous and important art of definition: the case of the old-growth forest.](#)” I also led the Long-Term Ecological Research Program at the USFS HJ Andrews Experimental Forest in the Oregon Cascades from 2012-2022, which has a long-term focus on the ecology of old-growth forests.

Let me begin by stating my support of Alternative 2 – Modified Proposed Action (Preferred Alternative). I believe that Alternative 2 best reflects the important and needed braiding together of IK and Western Science (WS) to secure a viable and resilient future for our forests, and beyond. The main points of my support, together with some important considerations, follow.

1. **Indigenous Knowledge.** I especially appreciate the raising of IK as an example of best science and at least a nod to the values that underpin IK. I do, however, see the necessity for more clearly articulating the underlying value premises that underpin IK, as well as the articulation of why those values are what we need to secure a resilient future for our old-growth forests – indeed for all forests. IK does more than simply provide more data points for wise forest management. It is a system of thinking, a philosophy, that includes metaphysical and ethical assumptions as much as it does epistemological knowing. I would challenge the USFS to articulate that in this proposal – or to find colleagues who can help. I fear that without the philosophical and ethical underpinnings of IK that we will not only fail to appropriately integrate IK but that we will reduce IK to only a fraction of its meaning and value.

2. **“Protection” of Old-Growth (OG).** I appreciate how the preferred alternative prioritizes protection of OG, but does not reduce “protection” to a simple no-touch or hands-off approach. Western conservation is often expressive of the idea that the best (healthiest, most resilient, more beautiful, etc.) land is the land least touched – and ideally untouched – by humans. I believe that you understand the ecological, historical, and philosophical problems with such a view. But I appreciate how, knowing this, you still articulate the value of OG and the need to work to secure its future. This position, however, is tricky. It requires, I believe, some more creative expression of the purpose and value of OG that might be a bit beyond what is normally articulated in these statements. I would encourage you to look at our Braiding Indigenous and Western Knowledge report linked above to perhaps get a sense of what a novel and creative articulation of purpose might look like. As is, I am not convinced that the articulation of value and purpose contained in the current DEIS is sufficiently rigorous. I think this defense gets even more challenging when we begin to include “mature” forests as well. Let me be clear, I believe we should think in terms of protecting both mature and old-growth forests, but I believe we might need some better arguments to defend that position than we often articulate. Again, the USFS might need to seek expertise outside of the agency to accomplish this goal.
3. **Flexibility.** I am almost daily struck by how the dominant Western worldview entices us to think in terms of stasis. So much of conservation, also, is built directly and indirectly upon this metaphysical assumption. But we know that the future will not be like the past, and we know that a failure to think of change (often unpredictable) as a fundamental reality of our future will lead us astray. As a result, we need to be adaptable, flexible, and nimble. The NOGA DEIS articulates this. However, this need can only be realized given other conditions. As just one example, those exercising that flexibility need to be worthy of extraordinary trust. Are we currently capable of such trust? Are we training future leaders to be capable of such trust? The answers to those questions are not at all obvious to me, primarily because it’s not at all obvious that we appreciate what it means to embody (or to train) trustworthiness. We need this quality – flexibility – but that quality asks other things of us. What are those other things and how do we create those conditions for the needed flexibility? This is perhaps another place where colleagues in the IK community and outside of the USFS might be of help.

Once again, thank you for your work on this NOGA DEIS, and indeed for all your work on behalf of the future of the forests of the United States of America.

Yours Collegially,

A handwritten signature in black ink, appearing to read 'MP Nelson', written in a cursive style.

Michael Paul Nelson