



September 20, 2024

Comments submitted via <https://cara.fs2c.usda.gov/Public/CommentInput?Project=65356>

Director, Ecosystem Management Coordination
201 14th Street SW, Mailstop 1108
Washington, DC 20250-1124

Dear Director:

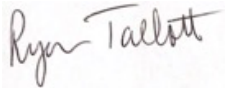
WildEarth Guardians (Guardians) submits the following comments in response to the U.S. Forest Service’s Draft Environmental Impact Statement (DEIS) for the National Old-Growth Amendment (NOGA). These comments¹ are specific to how the Pacific Northwest Region has conducted reviews to determine whether old-growth conditions are present during project-level analyses. Forests have been required to make such determinations in response to a directive issued by Deputy Chief Chris French in December 2023.

Attached to this letter are comments and exhibits that Guardians and over three dozen other organizations and individuals submitted to the Regional Forester for the Pacific Northwest Region on September 6, 2024. As explained in the attached letter, in at least two projects on Mt. Hood National Forest, the Forest Service improperly used modeling intended for landscape-level analysis “as a starting point” for determining whether old-growth conditions existed for two 3,000-acre project areas. The Forest Service did this even though it acknowledged the modeling has “known discrepancies” with “actual on-the-ground conditions.” The use of this modeling “as a starting” point eliminated the vast majority of the project areas from further old-growth review, even though the Forest Service had collected stand exam data. With only a few units remaining to review in the two projects, the Forest Service then used inapplicable old-growth definitions to determine there were no old-growth conditions present in the project areas.

We include these examples of how at least one national forest has evaded compliance with Deputy Chief French’s directive during development of the NOGA DEIS. These examples also underscore the need for a standard requiring stand exams for each stand in a project area and for that information to be disclosed during project scoping. The Forest Service should also have a standard that prohibits the use of modeling as a screening tool that eliminates project stands from further review for determination of old-growth conditions without further consideration of other sources, including sources of actual, on-the-ground conditions (e.g., stand exams).

¹ In addition to these comments, Guardians has joined other substantive comments regarding the NOGA DEIS. This comment is in addition to those other comments but submitted on behalf of Guardians itself.

Sincerely,

A handwritten signature in black ink that reads "Ryan Talbott". The signature is written in a cursive style and is positioned above the typed name.

Ryan Talbott
Pacific Northwest Conservation Advocate
WildEarth Guardians
PO Box 40490
Portland, OR 97240
(503) 329-9162
rtalbott@wildearthguardians.org

Exhibits (13)