

Data Submitted (UTC 11): 1/11/2024 5:00:00 AM

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Comments: OLD GROWTH PROPOSAL - USDA

I appreciate the opportunity to comment on the Forest Service's proposed amendment to 128 national forest land management plans to protect old growth. Unfortunately, this action will slow progress and remove focus from making a meaningful impact on millions of acres of overstocked and fire-prone national forest lands. The Forest Service should reconsider the current proposal of amending all its Land Management Plans through a single Environmental Impact Statement developed in less than a year. This type of approach risks undermining public trust and confidence in the agency, the science it is relying on to inform its management approach, and policy outcomes around old growth that instill confidence with the public.

Forest policy decisions should be very site-specific and are best made at a local level, not from top-down directives from Washington, D.C. Our national forests are dynamic and geographically unique systems that do not remain static. The Forest Service, the national forests, and the public would be better served through individual plan revisions and amendments at regional and forest levels.

The Forest Service should focus this opportunity to increase the pace and scale of active management to improve forest health and resiliency to wildfire, insects, and disease that are responsible for the loss of millions of acres of old growth on our national forests. I have had the good fortune of working for many years in and around national forest lands in the West. My assessment is that one of the biggest reasons old growth stands are at risk is that there is little proactive fuels management occurring to reduce the risk from fire. Wildfire is the enemy and is on a rapid increase.

Forest Service analysis 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. Any final amendment should provide clear direction and specific recommendations for active forest management within and adjacent to existing old growth stands to protect them from these threats.

The Forest Service was on a productive track to address 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. The critical need remains to reduce fuel loads near communities and in the expansive and growing Wildland Urban Interface (WUI), however many wildfires ignite and spread in the backcountry directly threatening old growth forests. As a result, the Forest Service should focus on forest health and wildfire resiliency across the landscape, beginning with the most fire prone and WUI sensitive areas.

Protecting old growth forests will require action and forest management. The Forest Service should describe and recommend, in detail, what specific actions it will take to achieve this outcome.

Sincerely,

Barry N. Dexter

ATTACHMENT: Old Growth Comment Letter 1.11.2024.doc - copy of letter