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Comments: Please see the attached letter of comment.

January 25, 2024

Director,

Ecosystem Management Coordination,

th

201 14 Street SW, Mailstop 1108,

Washington, DC 20250-1124.

RE: Comments on December 20, 2023 Federal Register Vol. 88, No. 243 88042 - 88048

Dear Sir or Madame,

Please accept the following comments on the above referenced Federal Register Notice. I am a professional forester and have been practicing forestry on public and private forests for over 31 years. I have worked in the mixed hardwood forest in New England and upper mid-west to coastal rain forest in Alaska to mixed conifer forest in the inland west. Regardless of the landowner, public, private or industrial, the value of Old Growth forests has always been recognized for its unique attributes and managing to conserve those attributes has been a high priority.

That being said, every forester knows that attempting to preserve a particular stand structure or age class on a particular acre over time is futile. Forest are dynamic systems and even though the frequency and pace of successional events differ, no forest can be held static. I believe the work done to date on inventory and preliminary threat assessment does a good job recognizing that. Certainly, on public lands, the various land management plans fully recognize the dynamics of forest succession that are inevitable and strive to address forest management desired outcomes considering that fact.

I oppose the proposal to do a national forest plan amendment under the auspices of old growth protection for the following specific reasons:

- \* The threat analysis is not complete and has not been released for public review and comment. How can you initiate a response to a threat when you don't even have the analysis done?

- \* Forest management is a very site-specific science. Similarly, strategies for conservation and recruitment of old growth are extremely site dependent. The appropriate level of forest planning for address this issue is the local level. Current forest plans already adequately provide for old growth conservation and recruitment. If there are plans that do not, they should be specifically identified and then only those plans targeted for amendment on this issue.

- \* A nationwide forest plan amendment will violate the intent and letter of the 2012 planning rule, which puts great focus on local level input and analysis. The lack of specificity included in this federal register notice on the proposed actions limits the ability of the public to provide substantive specific review and input on the proposed action. This is clearly a politically driven effort and timeline and not one based on an actual threat or the appropriate scientific response.

\* It will be impossible for the agency to meet the bar of a "hard look" required under NEPA if attempting to fast track a nationwide forest plan amendment. This will result in protracted and expensive litigation drawing resources away from the need for actual management response to old growth conservation.

\* All indications to date are the greatest threats to old growth are wildfire, insect and disease and potentially the highly speculative effects of climate change. The only available response to these threats is more scientifically driven active management to increase the pace and scale of restoration activities.

\* In the inland west, most of our public forest lands are now net emitters of carbon. How can this condition be acceptable to those supposedly concerned about climate change? With nearly 75% of our public lands under "hands off" management designations, these unmanaged lands are essentially ticking carbon time bombs, not the carbon sequestrations sanctuaries healthy forests should be. Given these facts, any strategies purported to have the purpose of conserving old growth and mature stand conditions must include MORE active management, not less.

To that end, the current process under way to amend 128 forest plans in an attempt to "protect" old growth may result in the exact opposite outcome. Preliminary work done to date clearly shows that the greatest threat to old growth forest conditions is not commercial timber harvest, but rather extreme wildfire behavior, insect and disease outbreaks and through extension, the highly speculative effects of a changing climate. The greatest threat to old growth appears to be doing nothing! Or to put it clearly, a misguided "Protection through Preservation Strategy". Some estimates indicate nearly 5 million acres of old growth being lost in the last two decades to wildfire and insect and disease alone. The current hands-off preservation strategy clearly does not work.

Furthermore, the majority of old growth forest, 54% occurs on lands that are already permanently excluded from active management activities. The remaining acres are governed by locally developed forest plans that incorporate local forest types, stand conditions, appropriate silvicultural techniques and consider social, ecological and economic factors to develop appropriate management schemes and necessary protections.

Both the Flathead and Kootenai National Forest Plans that I am most familiar with, contain objectives and standards that provide for the conservation and recruitment of old growth. Objectives and standards that use regionally appropriate definitions as well as management schemes tailored to the site-specific conditions on these forests. The effectiveness of neither plan would be improved by adoption of a nationally driven forest plan amendment.

The only outcome of such an amendment would be diversion of resources away from the forest restoration projects necessary to address wildfire, insect and disease and climate change. The likelihood of obstructionist litigation on the plan amendment would further delay or slow down the pace and scale of restoration treatments that are necessary to meet the objective of old growth characteristic conservation and recruitment.

As a professional forester, avid outdoor recreationalist, hunter, fisher and admirer of wild places, this effort seems entirely misplaced and misguided. A nationwide effort that shortcuts local level planning reeks of top down politically driven management scheme that has little likelihood to meeting the stated objective. Old growth stand conditions are widely recognized as unique and are already adequately protected through locally driven forest planning processes, both public and private. This effort is unwarranted and will only act as a diversion from the necessary focus on the true threats to our forests of climate change, wildfire and insect and disease.

We got into the situation we have today by recklessly pursuing the misguided notion that hands off preservation is best for protecting nature. Nature is dynamic and our attempts to date at protection through preservation have disrupted the very ecological processes our natural systems rely upon. Continued efforts to try to hold nature static will be similarly futile and society will continue to bear the negative outcomes. This perpetuates the people vs nature myth and will force society into even more drastic actions in the future with greater negative ecological outcomes. We are quickly re-approaching the "fire is the enemy" situation we faced in the early 1900's and the epic "man vs nature" battle that ensued, which is what got us to where we are today.

Please redirect this effort to the local level. Review which, if any, of the exiting 128 forest plans require additional bolstering of old growth conservation and focus the remaining effort and resources of the agency on the forest health crisis we currently face. Thank you for the opportunity to comment. We look forward to the opportunity to participate in a locally driven process, not a nationally driven political agenda.

Best Regards,

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Submitted electronically via [www.regulations.gov](http://www.regulations.gov)

ATTACHMENT: PRM OG Comments.pdf is letter content.