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Comments: To: Secretary Thomas J. Vilsack, United States Department of Agriculture

Re: 88/243 Federal Register/Wed., Dec. 20, 2023/Notices pgs. 88042-48

Mr. Secretary,

Thank you for this opportunity for public comment on the scope and content of the Environmental Impact Study leading to an amendment to forest management plans for public forests managed by the United States Forest Service.

Oregon's forests are of particular concern to me. Since 2016, I have watched fires, both wildfires and human-caused conflagrations, have an effect on public lands, particularly in the Rogue Valley, part of USFS, Region 6 land management plan area. My perspective is that of a life-long learner and co-leader of Rogue Valley Great Old Broads for Wilderness, a national public lands advocacy and stewardship organization that provides workshops that are based on the science and indigenous traditions of forest management. I also hike and camp on public lands in the Pacific Northwest and Northern California. I have visited many fire scars and accompanied botanists on inventories to gauge regeneration.

Under [ldquo]Purpose of the Amendment[rdquo], p. 88044-45, you state the management planning goal for old-growth forests to be [ldquo]improving and expanding their abundance and distribution and protecting them (old-growth forests) from the increasing (listed)threats[hellip][rdquo] These forests are our standing store-houses of resilience and self-regeneration from natural occurrences such as [ldquo] wildfire,[hellip],insects and disease, extreme weather, climate and temperature, (and) drought[hellip] [rdquo]. These forests are not naturally adapted to [ldquo]fire exclusion,[hellip]tree cutting, roads, land use allocation[rdquo], and urban encroachment. The USFS/USDA is less than 200 years old and arguably its management tools are the biggest challenge old-growth forests face. These succession forests have developed over millennia with genetic recovery strategies to natural events. It is these forests that protect us from climate change and atmospheric carbon, not the other way around.

I have been an attorney for 48 years and have done my share of legislative drafting and appellate work. It is very difficult to craft language that can[rsquo]t be interpreted in diverse ways that may be either helpful or harmful to the continued existence of mature and old-growth forests. Therefore, we must try to be as clear and forceful as possible in protecting old-growth forests from damage done in the name of improvement.

Land Management Plans change slowly, if at all, despite the lip-service paid to [ldquo]Indigenous Knowledge[rdquo]. Yet their form and content are critical to the protection needed. Language like [ldquo]management objectives[rdquo], without specificity in the EIS process, can lead to subordinating old-growth forest protection to economic or, even worse, partisan interests. A necessary rule includes the requirement that old-growth forest: 1. always be excluded from any harvest matrix for cutting timber or trees(thinning)and for extraction access to timber or tree harvest; 2. retention of sufficient maturing public forest adjacent to old-growth stands to provide habitat connectivity, especially for Endangered Species who can[rsquo]t live anywhere else, and watershed protection in harvest or thinning plans.

Thin away at younger re-planted trees on agricultural timber land. This process will help protect younger trees from fire until they reach maturity and gain forest characteristics. Having been planted by humans, they require human management of their growth.

Looking at the results of the Taylor Creek fire along ridge roads between Galice and the Illinois Valley, it was apparent that the worst fire damage was in same-age tree colonies. The nearby areas of old growth have charred trunks but their canopies were thriving. So is the herbaceous understory. The oxygen-rich air in these areas boosts animal habitat restoration.

I think it is important to broaden the term [ldquo]Tribes and Alaska Native Corporations[rdquo] to include the large numbers of indigenous communities who have been deprived of tribal status by the [ldquo]bean counters[rdquo]. Using the term [ldquo]Indigenous Knowledge[rdquo] connotes that the USFS possesses a written compendium of indigenous practices. Indigenous wisdom is not fixed but is ever- evolving because indigenous culture is alive and responding to changing challenges based on the cultural recognition of the reciprocal relationship humans have with the earth. It is based on cultural traditions, often stories, as well as patient present day observation and letting the forest system tell its story.

In defining the scope of the EIS, how is [ldquo]Indigenous Knowledge[rdquo] to be acquired by the USFS?

The customary invitations to Tribes and Alaskan Native Corporations to be involved or partner with federal agencies are unrealistic and inadequate. This is particularly true in the Pacific Northwest where indigenous peoples are scattered and with a variety of leadership practices as to who speaks for them. It is sometimes difficult to determine from the outside where the indigenous wisdom resides. Identification of the knowledgeable and active indigenous forest stewards isn[rsquo]t a job for AI. The EIS should have as a standard that local knowledge is necessary in each forest system. Protection plans should be hyper-local not regional.

The proposal to establish [ldquo](8)consistent and effective monitoring of current and future old-growth forest conditions over time[rdquo](p.88044) is essential to good management of all forests. Water and watersheds must be monitored also as the USFS needs information on the effects on water and watershed quantity and quality of public land timber/tree cutting as well as near- by private land clear-cutting of timber.

Most of all, a consistent national rule is necessary that includes a moratorium on cutting old-growth and mature forests in every region of the United States. Short of that, all present land management plans should be amended based on the realities of 2024, not the legacy practices of USFS past. Carbon sequestration in Oregon affects the whole USFS management area and beyond. A healthy forest system plays a vital part in a healthy economy.

ATTACHMENT: WE SHOULD NOT BE SELLING TIMBER OR FOREST PRODUCTS IN OLD GROWTH FORESTS.docx is letter content.