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Comments: Skamania County appreciates the Forest Service's efforts to balance the preservation of old-growth forests with the economic needs of our region. We believe that the Old Growth Amendment presents an opportunity to enhance the protection of these valuable ecosystems while maintaining a sustainable timber industry.

## Key Concerns and Recommendations

### 1. Active Management and Threat Mitigation:

o We strongly support the continued use of active management practices, including timber harvest, to mitigate the risks posed by wildfire and insect infestations. These threats pose significant dangers to old-growth forests and can outweigh the benefits of strict preservation.

o The Forest Service should prioritize research and implementation of effective strategies to reduce wildfire risk and control insect populations.

o We recommend the use of main Forest Service roads as fire breaks to create defensible spaces around old-growth forests and reduce the spread of wildfires.

### 2. Carbon Sequestration and Economic Impacts:

o While old-growth forests store significant amounts of carbon, younger, more vigorous trees often have greater sequestration capabilities. The Forest Service should consider the overall carbon balance of managed forests when making policy decisions.

o The Amendment should be implemented in a manner that minimizes negative economic impacts on local communities, particularly those reliant on timber-related industries.

### 3. Adaptive Management Strategy:

o The proposed Adaptive Management Strategy, while well-intentioned, could inadvertently lead to the creation of de facto reserves. We recommend that the Forest Service carefully consider the potential consequences of this approach and explore alternative strategies that balance conservation with economic viability.

### 4. Focus on Urgent Priorities:

o Given the pressing threat of wildfire, the Forest Service should prioritize the acceleration of active forest management efforts as outlined in the Wildfire Crisis Strategy. The Old Growth Amendment should not distract from these critical efforts.

### 5. Scale and Impact Assessment:

o The broad scope of the Amendment, encompassing 128 Land Management Plans, necessitates a thorough assessment of its social and environmental impacts. The Forest Service should ensure that the implementation of the Amendment is tailored to local conditions and avoids unintended consequences.

#### 6. Threat Assessment Findings:

o The Threat Assessment clearly indicates that wildfire and insect infestations are the primary threats to old-growth forests. The Forest Service should focus on addressing these threats through effective management practices.

o The data from the Threat Assessment suggests that strictly reserving old-growth forests may not always be the most effective protection strategy. A balanced approach that includes active management can help maintain healthy old-growth ecosystems.

#### 7. Avoid Discouraging Timber Harvest:

o While the Proposed Action does not explicitly prohibit timber harvest in old-growth forests, it could inadvertently discourage such activities. The Forest Service should strive to create a policy environment that supports sustainable timber harvesting while maintaining the integrity of old-growth ecosystems.

#### 8. Revise the Adaptive Management Strategy:

o The Adaptive Management Strategy should be revised to avoid unintended consequences and ensure that it aligns with the overall goals of the Amendment. The Forest Service should provide clearer guidelines for identifying areas suitable for future old-growth recruitment and avoid creating de facto reserves.

#### 9. Consider Minimum Requirements for Old Growth Stands:

o To prevent unnecessary restrictions on forest management, the Amendment should include minimum requirements for old-growth stands. This would help to clarify what constitutes an old-growth forest and avoid disputes over the classification of smaller areas.

By addressing these concerns and incorporating our recommendations, the Forest Service can develop an Old Growth Amendment that effectively protects old-growth forests while supporting sustainable economic development in Skamania County.

ATTACHMENT: National Old Growth Amendment (NOGA) Comments.pdf - this is the same content that is coded in text box; it was also included as an attachment"