

Data Submitted (UTC 11): 9/20/2024 4:00:00 AM

First name: Karin

Last name: Radtke

Organization:

Title:

Comments: To the USDA Forest Service, and advisory committee.

I have lived in an area surrounded by the Siuslaw National Forest for the past 50 years. My family and I have become very aware over the years that a natural forest of mature and old-growth trees is very different from an area that has been clear-cut and is a subsequent plantation forest with rotational harvest. It is also clear that thinning trees in this coastal forest has the effect of opening up the upper canopy to direct sunlight and drying out the forest floor. In August 2023 there was a lightning strike that took hold on such a dried out thinned area, causing a widespread forest fire. The Siuslaw National Forest is naturally a moist environment that deters the spreading of fire.

I am submitting this comment to emphasize the critical need for stronger protections for mature and old-growth forests within the National Old Growth Amendment (NOGA) Draft Environmental Impact Statement (DEIS). While the DEIS acknowledges the importance of these forests for climate resilience and biodiversity, it does not go far enough to prevent their degradation through commercial logging and other extractive practices. The adoption of a modified version of Alternative 3, which restricts all commercial timber harvest in these areas, is necessary to meet both national and international climate and biodiversity commitments.

The DEIS currently underestimates the role of mature and old-growth forests as Natural Climate Solutions, as highlighted by Law et al. (2021, 2018) and Mildrexler et al. (2023). These forests are critical for carbon sequestration and storage, with large trees being especially valuable due to their superior resistance to fire and high rates of carbon accumulation (Moris et al., 2022). The DEIS's preferred Alternative 2, which allows for logging under the guise of proactive management, fails to align with the scientific consensus that protecting these ecosystems is the highest priority for reducing greenhouse gas emissions (IPCC, 2022).

Additionally, the DEIS lacks a clear framework for identifying and protecting mature and old-growth forest areas, leaving these ecosystems vulnerable to degradation. The document should include specific guidelines for using Geographic Information System (GIS) and other penitent styles of mapping to precisely delineate old-growth areas and ensure transparent management practices. The absence of such detailed forest inventories and the reliance on statistical sampling methods undermine the potential for effective conservation. Implementing a science-based, spatially explicit strategy would support the recovery and expansion of old-growth characteristics across national forests, as suggested by Law et al. (2021) and the USDA Forest Service (2024).

To address these issues it, I recommend that the DEIS be revised to adopt a modified Alternative 3 that explicitly prohibits all commercial logging in mature and old-growth forests, including those that have not yet been fully inventoried or mapped. The document should incorporate the latest scientific findings on the ecological and climate benefits of protecting large trees and mature forests and ensure that these critical areas are managed to support long-term ecological integrity and climate mitigation.

The Forest Service must prioritize the protection of mature and old-growth forests as a national and global imperative. Strengthening the DEIS to fully safeguard these ecosystems from commercial exploitation will demonstrate the United States' commitment to addressing the climate crisis and preserving biodiversity. It is imperative that the final version of the NOGA reflects a proactive approach to conserving these irreplaceable natural resources.

I support and agree with Coast Range Association's and Beverly Law's detailed comments submitted, and point you to them for more details and their various references included.

Thank you,

ATTACHMENT: Radtke to USDA Forest Service.docx - this is the same content that is coded in text box; it was originally included as an attachment