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First name: John

Last name: Copsey

Organization:

Title:

Comments: COMMENT LETTER: NATIONAL OLD GROWTH PROPOSAL

Thank you for accepting this comment regarding the Forest Service's proposed amendment to 128 national forest land management plans to protect old growth. The Forest Service should take advantage of 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 mature and old growth on our national forests. The Forest Service should reconsider the current proposal of amending 128 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 any policy outcome around old growth.

Major forest policy decisions should be accomplished through robust local engagement and public participation, not through a top-down directive from Washington, D.C. Our national forests are dynamic systems, not static. They are also geographically and ecologically unique and require different approaches based on local conditions. The Forest Service, and the public, would be better served through individual plan revisions and amendments at the Regional and forest levels.

I am a California Registered Professional Forester that has worked in and around our National Forests since 1976. It is heartbreaking to witness the result of the past hands off approach on our National Forests lands and the subsequent rapid increase of extreme wildfire in our National Forests. We are losing millions of acres of public lands that include mid-successional and old growth forest, as a result of this lack of forest management. One hundred years ago we took fire out of these ecosystems through fire suppression; we are now faced with forests that are extremely overstocked with fuels. As recent evidence has shown, when we do not manage the vegetation in these forest stands they are converted by stand replacing wildfire.

The Forest Service 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 must 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 has set an ambitious goal of expanding active management to reduce 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. While the NOI mentions the need to reduce fuel loads near communities and the Wildland Urban Interface (WUI), most wildfires ignite and spread in the backcountry directly threatening old growth forests. This requires the Forest Service to focus on forest health and wildfire resiliency across the landscape and on the most fire-prone areas.

The Forest Service should not lose our national forests for the trees and instead focus on overall sustainable forest management and forest health. Protecting old growth forests requires action. We urge the Forest Service to describe and recommend, in detail, what specific actions it must take to achieve the agency's stated goals.