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Comments: Re: Project 65356, National Forest Plan Amendment to Conserve and Steward Old Growth Forests
Land Management Plan Direction for Old-Growth Forest Conditions across the National Forest System

I support the maximum level of protection for our nation's old growth and mature forests. I urge the Forest Service, in the DEIS on this proposed national forest plan amendment, to include more than one alternative that would call for the elimination of all forms of logging and roading in all old growth and mature national forest lands. Specifically, no roadless areas should have any form of management that manipulates the forest under any name or for any reason.

It's very important that decision makers of policy on public lands give precedent to the overarching need for better, more aggressive conservation of our nations forests, wildlife and water as our planet enters into uncharted impacts of the climate crisis. For 40 years we've seen essentially nothing but hollow words. The fact is that there has been all but zero substantive action taken to arrest and reduce the human-caused impacts driving the global warming we face today. Forest policy has been no different.

Substantive action now to suspend any and all impacts to old growth and mature forests in our country would be a good start. The fact is that we need a whole lot of actions like this to give life as we know it on this planet a chance of continuing, for the most part, as we know it.

The Forest Service, by using this amendment proposal, will be able to clearly and cleanly justify sound protections for old growth and mature forest lands nationwide. The FS can finally put to rest the inappropriate management approaches that have dominated decisions for too many years.

One of the factors to be considered when following the NEPA process is the concern of the locally affected economies. The fact is, problematically, that it is this attention to economics that has gotten us into this crisis in the first place. The FS decision makers in this process MUST put the unsound economic arguments of industry and many politicians aside or the outcome will be a continuation of the increased problems of the climate crisis. That must be made clear.

Since the 70's, when I first became active in wildland and wildlife issues in Montana, I have rarely seen a true conservation-based decision by public land managers that actually stemmed the problem at hand. Sometimes there would be a reduction of the impact being studied and by management actions that follow. In this case, we do not have the time, if you will, to punt on the hard decision that we MUST stem activities that continue this poor trend of 'balance' that is truly not working. That statement, as you know, is supported by endless science. We have the knowledge so let's use it.

Climate

As the Biden Administration and the USDA Forest Service have been preparing for this analysis, a international group of scientists published a peer-reviewed paper that notes data clearly suggests it is resource extraction, driven by unabated consumerism, that is the primary problem. <https://merzinstitute.org/media-release/new-paper-identifies-behavioural-crisis-driving-overshoot/> Our market-driven push to exploit any and all resources needs to be addressed if we are going to, as I would sum it up, have a bat's chance in hell of pulling out of this crisis.

The information released by the White House pertaining to this process notes that this project is necessary "... to conserve and restore America's mature and old growth forests. America's forests are a key climate solution, absorbing carbon dioxide equivalent to more than 10% of U.S. annual greenhouse gas emissions."

The most important statement made at or about the COP28 meetings was by someone before the climate conference began. I paraphrase: 'If we were actually doing something about the impacts driving the climate

crisis, there would not be a COP28, as there would be no need to debate endlessly about what we should do. In fact, there would not have been a reason to have a CPO2.' I do not remember who said it, but it truly sums up the whole issue.

For about forty years now, politicians, organizations and land managers, among others, have paid endless lip service to the need to address the global warming climate crisis. In that time exactly zero substantive action has been taken either in this country or at a global level that seriously tackles the causes of the crisis. We are at the brink now, if not already to a point where we may see drastic changes to life as we know it on this planet.

The time is now to take full-throated and solid, substantive actions to arrest the crisis. This amendment would be one such step.

Wildlife and Water

When I was young, growing up in MT, the elk hunting season was long and essentially unrestricted. Not so any more. The primary reason for that loss of hunting opportunity is the loss of habitat. The Bridger Range in MT arguably had the finest mule deer habitat and populations in the nation, but no more. The primary reason is the loss of habitat. As a kid, I caught countless grayling in the Big Hole River, but a fisherperson is lucky to even catch one today. One reason for that is the loss of headwater forests providing clean, continuous runoff. The list goes on and on.

One of countless examples of the conflict between problematic logging and water concerns was witnessed on the Beaverhead Deerlodge NF back in the '80's when the quest to get the cut out fouled the Blue-Ribbon trout stream, the Madison River. A study was ignored that showed the money generated by the fishing industry on that river in a season far exceeded that generated by the timber industry in the multi-county area around the area. The fishing did not degrade the water. There were serious priority problems on the part of the FS. Now is a good chance to correct that.

The impact of roads on wildlife is well documented. Wildlife biologists, including professors and MT Fish and Wildlife, published a study in the '80's that identified the degradation of elk habitat by roads. They identified a maximum road density they thought would help stem the problem. The timber industry cried foul, and the FS foresters tended to ignore it. Of course, the best wildlife habitat, whether elk or wolverines, is that which is free of roads and motorized use. Many species, like wolverine, are dependent on mature and old growth forests. As with trout fishing, elk hunting is of significant economic value with little actual impact to the wildland resource, unlike roading and logging.

Old growth forests, and mature forests in the late stages of natural succession, are nature's own filters. They absorb and store carbon, keep the waters clean, put off oxygen and provide invaluable habitat. The maximum level of conservation of these forests is the highest and best use of our public lands. Anything else is simply creating the same old problems over and over that contribute to the ever-worsening climate crisis and the problematic loss of biodiversity.

Fire

Wildfire is something I am fairly familiar with, at least pre-climate crisis fire as a long-time wildland firefighter. I can't count the number of fires I was on in the '70's and '80's, but I would guess about 50 large (project fires as the old terminology called them) and a whole lot of little ones. Some of the worst fires, from a firefighter's perspective at that time, were in logged over areas. My last fire was 1988.

As fire science studies have repeatedly shown, older and larger trees tend to be the most fire-resistant. The FS has proof of that, if they were paying attention to their own data. In the '90's, when a big fire bust burned in the Sula RD, and over into the Beaverhead NF, a good friend was the GIS mapper for the fire complex. As that person knew I knew the area well, I was given copies of the daily mapping that went to the overhead team. It was not rocket science to see that both fire spread speed and intensity was greater in the previously logged areas - no matter how long ago - than in the mature and old growth, most notably the Anaconda Pintler Wilderness.

An ongoing, historic problem the FS regularly displays is foisting on the public the need to (over)log our forests to prevent catastrophic wildfire. Science says it is pure baloney. It is back to the age old problem of 'get the cut out' using false pretenses. Here in Eastern Oregon, the Wallowa Whitman NF has two 'treatment' proposals that are based on false pretenses to justify logging. It is just a fact that it will do exactly nothing to protect homes on the

wildland-urban (sic) interface. Ours is one.

Here in Pine Valley, we have a Firewise program. Most everyone in our neighborhood have taken advantage of the program to learn about, and get some help, to do the work that will actually provide some protection to our home and outbuilding. That is to reduce the fuel load within a few hundred feet of our home. And to do the work necessary to make the buildings themselves more fire resistant. The FS has a very poor track record, at least in the areas I have lived and worked, of honestly informing the public of the facts.

A fire ecologist friend of mine has more times than once sent arial photos of residential areas burned over by fires. In the most dramatic ones, around Lake Tahoe years ago, the fire, when it reached the homes, was jumping from house to house leaving most of the trees unburned. The disaster at Paradise, CA, showed that as well. More important about the Camp fire was the fact that the area around Paradise had been heavily logged, with much of it done in the name of preventing wildfire. Proof in the pudding that historic, industry driven logging programs fail the fire prevention test.

The FS must change directions when it comes to fire. It is, of course, broader than just the logging, but curtailing any and all roading and logging (under any of the false labels foresters use these days) would be a huge benefit to, and a great segue for the FS to aggressively promote sound firewise work in the wildland-urban interface. As noted above, and in many studies that have been done, old growth and mature forest are more resilient and fire resistant than any type of 'management' the FS has undertaken.

One of the greatest problems with current forest management at every level is the failure to recognize that any level of current types of logging management change the forest to a drier state. How many times have we seen logging of mature/old growth forests change the landscape from moist, mesic sites to dry, xeric sites. In today's climate scenario, that is wholly unacceptable.

This forest plan amendment process to preserve and promote old growth forests would be a benefit, actually, to the wildfire equation by allowing manpower and resources to be put where needed to help protect homes. As in the previous sections above, it is a win-win for everyone.

Economics

Years ago, I attended a program on forest economics where economist Randall O'Toole repeatedly made short work of Forest Service personnel who were trying to defend the below-cost timber sales on what we call the 'East Side' forests.

Today, the FS has a bad habit of hiding logging programs in what today are called treatment programs. One only has to look carefully at the complete proposal to know most of the time that is no more than a justification for logging. Treatment to improve wildlife habitat; just logging with green ribbons. Treatment to improve fisheries habitat; just logging with blue ribbons. On and on. It is just how the FS justifies below-cost timber programs. They shift the costs to another program instead of timber. That has to stop.

In many places in my comments, above, I have addressed the wrong orientation of using support of local economies to justify roading and logging. I come from one of the ultimate over-logged national forests: the Bitterroot. As project work for the IR crew I was on, we cut out the helicopter landing zones for the congressional committee visiting the forest after the Sierra Club v Block decision.

The economies of many, and probably most small communities adjacent to national forests would be better served by the long-term stability of protecting the resources than the cut and run nature of most of the logging industry. As I noted, I grew up in Western Montana. When I was young, there were something like seven lumber mills in the valley. I don't think there is a single 'lumber mill' left. There are a couple 'value added' mills that do log homes. And that left the smaller communities in a world of hurt when the big outfits simply pulled up stakes and left the communities holding the bag.

It is important that the DEIS for this proposed amendment cleanly and clearly address the honest long-term values of healthy forests. Not the fako-bako forest health claim that is ... more logging.

I mentioned the economic benefits from fishing and elk hunting. Other low-impact forms of recreation also provide long-term economic benefits to communities all over our country that are adjacent to national forests and parks.

Summation

As the White House fact sheet notes, this proposed amendment would set sound and consistent management direction for national forest land managers nationwide to put preservation of old growth and mature forests as a

primary directive.

Old growth, once logged, is gone for good in the life cycle of the human; it can take many hundreds of years to reach that level of maturity.

The time has come for our society, through management direction the Forest Service can provide, to put the natural values of old growth and mature forests above the shallow economic value of logging and roading. We must give maintenance of biodiversity of the wild land the priority. The benefits noted above, and certainly by countless scientists and ecologists commenting on this proposal, demand immediate and firm action.

As the Forest Service Notice of Intent on this proposed amendment states. "[t]he intent is to foster the long-term resilience of old-growth forest conditions and their contributions to ecological integrity across the National Forest System." Let's not have this statement be more hollow words.