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First name: Stephen

Last name: Cole

Organization:

Title:

Comments: Please consider these scoping comments for the National Old-Growth Plan Amendment (NOGA) (#65356):

Like the vast majority of comments submitted, I fully support the effort to provide better protections for old-growth *and* mature forests in our national forests. That being said, I am not supportive of the Forest Service's current thinking regarding the implementation of a new plan amendment. This week, Pete Nelson of the Forest Service presented a short update about the current process at the Northwest Forest Plan Federal Advisory Committee (FAC) Meeting in Eugene, Oregon.

Essentially, Pete told the committee that the Forest Service want to use this plan amendment as an overlay and wants the local forest plans to be the mechanism to guide actions. In my opinion, this is the wrong tact to take. In the Pacific Northwest, all of your individual Forest Management Plans were adopted in 1990 when conventional wisdom and the body of research about old-growth and forestry itself was vastly different. In 1990, old-growth was valued for its board feet and revenue generating capacity, not for their ecological function and importance. If these local forest plans are NOT to be updated, how can they truly be trusted to protect old-growth, knowing what we know today? Today, if one comments about old-growth presence in a proposed project area, the response from the Forest Service is "well- the stand in question is located in the harvest base (or Matrix) so it's eligible for logging...."

Mr. Nelson further presented:

"NOGA NOI: 'If existing plan direction provides more restrictive constraints on actions that may affect existing or potential old-growth forest conditions, those more restrictive constraints would govern.'"

But what if those more restrictive constraints do not exist? Once again, it's hard to believe a forest plan written in 1990 is going to have "more restrictive" constraints. With a top down approach, you've left open the door for a lot of variance and wiggle room out in the forest.

Another bullet point presented this week was that "NOGA does not direct use of management areas to conserve/recruit old-growth; rather, uses a "forest wide" condition-based approach." This just invites death by a thousand cuts. By far, the go-to response by the Forest Service to submitted comments is that a proposed action will have negligible impacts and this is because the Forest Service uses myopic blinders when evaluating its projects. Cumulative impacts and past actions aren't given serious weight and consideration. The Forest Service will asset that "...in 40 years, we anticipate that the stands will recover and accelerate towards mature/old-growth conditions.." and yet the Forest Service will go BACK into a stand in 20 years time and effectively reset that response clock. This has happened in the Mount Hood National Forest on the Grasshopper project.

Now is the time to be bold and implement a "no net loss" policy such as what the federal government has had with respect to wetlands. This policy should focus primarily on management actions (including reciprocal right-of-way transactions if any exist on Forest Service lands). Climate change and wildfires will consume old-growth and that is, unfortunately, the world we have created through our previous actions.

With respect to inventories and monitoring, I would remind the Forest Service that, in addition to the long history of the Forest Inventory and Analysis (FIA) Program, there are other continuous bodies of research that provide long records of repeatable observations in mature and old-growth forests such as the Demonstration of Ecosystem Management Options (DEMO) Project, which was thoroughly summarized in the 2020 General

Technical Report PNW-GTR-978. This project is already established & well documented and could be continued simply with additional funding. Furthermore, none of the project areas have experienced wildfires during their length of study and so any new data collection could be compared against the original observations without adjustment.

Thank you,

Stephen Cole
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