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First name: William

Last name: Buckman

Organization:

Title:

Comments: Due to the fact that Northern California has a severe fire ecology driven by consecutive years of drought, it would be prudent to include this in the amendment, highlighting the destruction caused by insects, diseases, and natural disturbances. In our area, Northeastern CA, we experience annual dry lightning events that have resulting in the loss of thousands of acres of Nation Forest Lands, i.e. Cove, Stone, Gold fires, etc.

With the 1.7 million acres that are listed as late successional reserves in Northern CA, the continued potential for these forests to be threatened and or impacted by devastating wildfire, insects, or disease is a real concern. It has become apparent over the past 20 years that this top-down approach to old growth forests is not working. The proposed plan amendment must dramatically change the approach to reduce stand density, in all forest areas, in light of the fact that over 6 million acres within the NWFP area have been destroyed by wildfire but do not appear in the forest service monitoring reports.

Forest overgrowth is apparent, and the lack of management has caused severe damage to the entire ecosystem. Currently, on USFS lands, the stands contain largely five times more trees to the acre than it can sustain. Active management must be addressed in the amendment to the plan in order to eliminate the mortality rate of trees and provide for growth of a healthy sustainable forest. The FIA has recently published their findings on tree mortality exceeding growth on federal forest lands.

In conclusion, a review of the past 30 years will show that the watershed conditions in Northern CA have steadily declined and that without drastic changes to the 1995 plan, we will continue to experience degraded watersheds that cannot recover from years of little to no effective management.