

Data Submitted (UTC 11): 2/3/2024 1:04:38 AM

First name: James

Last name: Pass

Organization:

Title:

Comments: February 2, 2024

RE: Comments on the Proposed Action for the Land Management Direction for Old-Growth Conditions across the National Forest System

Dear Secretary Vilsack,

I have 21 years of experience as a silviculturist and currently practice in a fire-frequent forest (this includes low and mixed severity fire regimes). I'm submitting these comments as a private citizen. During my career, I've worked on several post-fire recovery projects and they all have a common theme: uncharacteristically severe fires are killing large old growth trees and it will take 200-500 plus years to replace these trees. Fires are the number one threat to old growth in fire-frequent forests in the western United States. I've also seen many forests with dead and dying fire tolerant old growth that is being choked out and replaced by fire/shade tolerant trees.

Particular to fire-frequent forests, I am concerned that the proposed Land Management Plan Direction for old growth forest conditions will result in increased analysis burden for projects, increase litigation, reduced treatment acres in old growth, and increased losses of old growth. Please include a desired condition for fire-frequent western forests that specifies that it's desired to use treatments to prepare old growth for wildfire by increasing resilience and resistance to disturbance. Having such a desired condition makes it clear that letting nature follow its own course is not a viable strategy for the protection of these forests. These forests are highly departed from reference and HRV conditions; when compared to reference conditions, these forests have fire deficits and historic management that has resulted in too many trees, too many drought and fire-intolerant trees, too few drought and fire tolerant trees, and too much connectivity of tree crowns. This shift in conditions is well documented in the scientific literature.

Please revise the 3rd desired condition, shown below, to reflect sustainable carbon storage in fire-frequent forests.

"Carbon stored in old-growth conditions contributes to the long-term carbon storage, stability, and resiliency of forest carbon across the National Forest System."

Carbon storage in fire frequent forests is unstable and vulnerable to loss due to wildfire and insects and disease. Carbon storage is only stable when conditions reflect reference and HRV conditions for forest density, species composition, structure, tree vigor, and landscape patterns such as openings. The 3rd desired condition would increase the analysis burden for projects, increase litigation, reduce treatment acres in old growth, and increase losses of old growth.

Please revise the 4th desired condition, shown below, so that it is bounded to reference and HRV conditions.

"The long-term abundance, distribution, and resiliency of old-growth conditions contribute to the overall ecological integrity of ecosystems and watersheds."

The following standard will be contentious and will open the door for litigation:

"Vegetation management activities must not degrade or impair the composition, structure, or ecological processes in a manner that prevents the long-term persistence of old-growth forest conditions within the plan area."

What is the threshold that a responsible official will use to know when the vegetation management activities degrade or impair? Allowing nature to take its course in departed fire-frequent will result in a continued loss of old growth. Some minor degradation or impairment could be necessary to protect old growth from wildfire. Please

remove the first standard or state that it doesn't apply to fire-dependent forests. The second and third standards are adequate for addressing the long-term persistence of old growth conditions.

The old growth definitions do not specify the scale of what is considered old growth. Is it a tree, a clump, a grove, or a stand? It would be helpful if this was clarified.

The definition used for old growth is not settled and it is contentious. There is scientific and social controversy about the definition. The definition of old growth is connected to the level of impacts that are disclosed. The definition of old growth that is used is important for setting the scope and scale of impacts and setting the stage for whether the old growth management approach will be successful in meeting desired conditions. Please analyze additional alternatives that are based on different old growth definitions. This approach would ensure that the responsible official takes a hard look and makes an informed decision.

Thank you for considering my comments.

Sincerely,

James Pass