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Comments: Hello-

Nature is a self-correcting organism, we do not need to "manage" our old-growth forests. If there is a desire to harvest old-growth forests this should be clearly stated but not hidden in Forest Service "studies".

Below please find some of my objection with footnotes demonstrating expert opinions on the proposed work in our old-growth forests.

1. Lack of limits/specifications related to forest management in the 2024 DEIS: The emphasis is on efforts to manage forests that have been OR could be affected by fire or insects. No details or limits on management methods have been provided. However, agency[1] as well as independent scientists[2] published in the scientific literature have shown that forest extraction ("thinning," "fuels reduction") can and have resulted in high severity fire when they do burn. These results caution against large-scale management focusing on extractions.
2. Tree mortality: The 2024 DEIS finds that mortality from wildfire is "currently the leading threat" mature and old-growth forests, followed by insects and disease - but fails to explain that an abundance of snags (standing dead trees created by wildfire and/or insects etc.) provide critical habitat for multiple listed and imperiled species including fisher [3]and spotted owl - and do not necessarily increase the risk of wildfire spread or increased wildfire intensity (please see 1. and citation).
3. Inadequate Cumulative Impacts: Thinning related tree mortality[4] is not mentioned or accounted for, therefore cumulative impacts are not being considered.
4. Exclusions in Cited Report: The USFS Report, "Analysis of Threats on Lands Managed by the Forest Service and Bureau of Land Management," excludes critical findings revealing multiple intact, undisturbed mature and old-growth forests tend to burn with low or moderate intensity - in contrast to heavily managed forests that have burned with higher intensity (please see 1. and citation).
5. Near-WUI treatments: While discussing Alternatives, the DEIS 2024 states that "the density of stands may be reduced through thinning or prescribed fire in ~6.2 million acres of old-growth (25 percent of total old-growth) that is "estimated to be in WUI" - providing no specifics (e.g., structures, distances, developments). As stated above, the idea that "thinning or prescribed fire" would effectively treat old growth to reduce the risk of wildfire depends on the size of trees removed, the extent of treatment, equipment used, transport of grass seeds on equipment, which can exacerbate rather than reducing the spread and severity of wildfire.
6. "Thinning": The proposed "thinning" projects could lead to massive carbon losses not mentioned or accounted for in terms of future wildfire risks, climate change impacts[5].
7. Carbon emissions: There is no mention of emissions related to "thinning" actions and other forms of forest extraction, which has previously resulted in 5 times more carbon emissions than wildfire[6].
8. Post-fire regeneration overlooked: The DEIS 2024 makes claims about destruction due to intense wildfire while failing to account for prolific regeneration and high biodiversity that has been shown to follow those wildfires if forests are left intact. For example, recent findings reveal abundant giant sequoia regeneration[7] within intensely burned patches of forest.
9. "Wildfire risk reduction": There is an little implicit assumption that "vegetation management actions" can

"optimize wildfire risk reduction," when an increase in wildfire impacts within previously treated areas can and has occurred in recent large wildfires (please see above).

Thank you for your consideration

[1] <https://fireecology.springeropen.com/articles/10.1186/s42408-021-00118-z>

[2] <https://esajournals.onlinelibrary.wiley.com/doi/full/10.1002/ecs2.1492>

[3] [https://www.researchgate.net/publication/236170037\\_Conservation\\_of\\_Fishers\\_Martes\\_pennanti\\_in\\_South-Central\\_British\\_Columbia\\_Western\\_Washington\\_Western\\_Oregon\\_and\\_California\\_Volume\\_1\\_Conservation\\_Assessment](https://www.researchgate.net/publication/236170037_Conservation_of_Fishers_Martes_pennanti_in_South-Central_British_Columbia_Western_Washington_Western_Oregon_and_California_Volume_1_Conservation_Assessment)

[4] <https://www.mdpi.com/2073-445X/11/7/995>

[5] <https://www.frontiersin.org/articles/10.3389/ffgc.2022.867112/full>

[6] <https://www.congress.gov/117/meeting/house/112540/witnesses/HHRG-117-II10-Wstate-LawB-20210429.pdf>

[7] <https://www.mdpi.com/2571-6255/7/2/44>