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Director

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Dear U.S. Forest Service,

Enclosed are the comments of the Lone Star Chapter and Houston Regional Group of the Sierra Club (Sierra Club) about the U.S. Forest Service (FS) proposed "Land Management Plan Direction for Old-Growth Forest Conditions Across the National Forest System", Draft environmental impact statement (DEIS).

1. These comments are supplemental and subordinate to comments that the National Sierra Club makes. National Sierra Club comments take precedence over comments that the Lone Star Chapter/Houston Regional Group make, and in the event of a conflict between the two sets of comments, National Sierra Club comments overrule those of the Lone Star Chapter/Houston Regional Group.
2. These comments reflect the experiences that the Sierra Club has had, via its collaboration and interaction with the FS in the National Forests and Grasslands in Texas (NFGT), in implementation of mature/old-growth forest protection, using the 1996 Revised Land and Resource Management Plan (Forest Plan).
3. At present, the Sierra Club supports an OG alternative which doesn't exist in the DEIS. The alternative which the Sierra Club supports, and which doesn't exist in the DEIS, would be based upon these Sierra Club comments. The Sierra Club doesn't support the FS OG Modified Proposed Action (Preferred Alternative 2) and or Alternatives 3 and 4.

4. It's unfortunate that the FS has chosen to treat old growth (OG) as another way to grow and log trees. The public, as owners of the national forests, needs a program that allows Nature to grow OG and where the FS protects that successional process, including when OG trees die and become snags/downed wood and enrich the soil and store carbon.

Nature must be allowed to establish the baseline for OG/near OG forests. The way the FS proposes this amendment is that the FS will develop and create OG forests and not Nature. This ignores what we are given for free from Nature OG forests. The FS acts like it can accomplish the development of OG forests when it emphasizes logging OG/near OG forests.

Right now, what the FS proposes is too much like "playing God". We don't know what Nature will do as a result of climate change and we don't know enough to make changes on 24.7 million acres OG that the FS has stated are in our national forests.

There should be at least two parts to each alternative presented. The first part is what the FS will do right now to protect existing OG/near OG forests/trees. This part of an OG alternative is missing in this proposal. Protection provides boundary marking of OG/near OG forests, no logging of OG/near OG forests, protection of streams and soils in OG/near OG forests, monitoring/research in OG/near OG forests, and other protective measures for OG/near OG forests.

The second part of the proposed FS OG alternative is what the FS can do, which is outlined in this proposal and can be referred to as "business as usual" (logging and treatments), to assist Nature in growing OG/near OG forests/trees. This should be done only in limited, specific, circumstances and should never be viewed as taking the place of Nature and the time it takes Nature to grow OG/near OG forests/trees.

Forestry practices (called treatments in this DEIS) aren't a substitute for "Time" in the growth of OG/near OG forests/trees. Time means the time that is necessary for the growth (not development or creation) of OG/near OG forests/trees. The FS in this OG proposal forgets about time and focuses on "hurrying up Nature". Nature won't be hurried up. Forests need time for OG soils, climate, associations, fungal connections, etc., to grow on Nature's time schedule and not our "hurry burry" one.

5. OG is more than old forests/trees. Even when OG trees die, the area where this happens has OG soils, nutrients, organic matter, fungi, soil flora, soil fauna, etc., that should be protected and not logged or treated. There are inclusions of early successional and other successional areas in OG forests that are natural and should be retained in OG forests and not excised as the FS proposes in this DEIS. Otherwise, the FS will salvage log, otherwise log, and conduct other treatments to OG forests and continuously reduce them in size until they don't exist. We then lose OG forest soils, etc.

Logging and most other treatments cause compaction, soil erosion, soil sedimentation, puddling (soil deformation), rutting, and further degrade OG forest soils. Since many trees are linked together via fungal connections, OG forest soils must be protected so that this adaptation (fungal connections) which protects against drought and other natural or human-made climate change conditions can be protected and allowed to grow and mature.

There is almost no mention made of soil in this DEIS. It's as if soil doesn't exist and only is used by the tree to keep its equilibrium. Soil is the very lifeblood of why OG forests/trees exist and survive. Without specific OG forest soil protection and allowance for its' growth this proposal can't be approved.

6. This proposal fails to address mature forests/trees. There is a need to protect mature forests/trees to allow them to grow into OG forests/trees. This proposal shouldn't be approved unless there is a protective program in place for the growth of mature forests/trees.

7. The FS is silent about salvage logging and what role it will play in the perpetuation of OG forests/trees. Unless there is a problem with safety, the Sierra Club supports that within OG forests salvage logging should not be allowed and natural restoration, regrowth, and recovery be allowed in these forests. These forests should be monitored and studied to learn about the natural restoration, regrowth, and recovery processes so that this information can be applied in other parts of national forests. OG forests should not be commercially logged at any time.

8. Since human-created climate change will probably last for 100's or 1,000's of years, the FS needs to have a vision for OG forests/trees that extends at least this long. We don't know what our forests will look like in the 100's and 1,000's of years that human-created climate change will affect them. Therefore, we need to be conservative about what human-manipulated and altered methods we use.

We could misread Nature and create biological/ecological problems when we try to encourage OG forests. The more we monitor, study, and publish research done on OG forests for public review, input, and transparency, during climate change, the more we will learn what is happening and what works and doesn't work. This needs to take place before any logging or other treatments are conducted which can alter OG/near OG forests.

We have forests/trees that are progressing to OG/near OG in wilderness areas. There is little or no research that is done in the NFGT and in other national forests to learn about vegetation and its succession in wilderness areas. Wilderness areas are natural controls and reference areas that should be used for OG, near OG, and mature forest/tree research. The results can then be applied in the NFGT and other national forests.

9. The FS is chasing human-caused climate change modifications and will always be behind what Nature decides to do in OG, near OG, mature forests, and other forests in the national forests. That's why it's important to learn what we can from existing OG forests before we decide that we know what will grow due to climate change, before we decide we know what is needed, and or before we decide what will come next due to our treatments.

10. Since many disturbances are natural, including insects, disease, fire, and wind, these natural disturbances shouldn't be used to alter OG/near OG forests. These natural disturbances are part of a natural ecological process called "plant succession". The FS shouldn't spend time "fighting against Nature" but should "work with Nature" and not log OG/near OG forests due to natural disturbances.

11. Page 9, 1.9.1 Substantive Requirements Consideration, the FS states a falsehood when it says, "substantive requirements for the proposed amendment are not based on adverse effects as there is no indication the proposed action will result in substantial adverse effects or the substantial lessening of protections for a particular resource".

The FS provides many excuses/exceptions for logging OG/near OG forests/trees in all the alternatives, including the No Action Alternative. These excuses/exceptions, Page 23, Management Approach 1. B (NOGA-FW-MA-01b), which are poorly and broadly defined which allows logging or other treatments under almost any circumstance include:

- a. Logging for long-term resilience.
- b. Logging to reduce fire hazard, spread, or severity or the spread of potential insect or disease outbreaks (notice using the word "potential" allows logging when the insect or disease isn't even present).
- c. Logging to provide landscape-level redundancy and representation for OG forests.
- d. Logging to enhance landscape and patch connectivity where OG patches are isolated.
- e. Logging to recruit and promote the development of future OG forests where current conditions in mature forest are likely to achieve the OG forest definitions and associated criteria in the shortest timeframe possible.
- f. To retain and promote the development of OG forests in watersheds, fire-sheds, or other relevant landscape units where amounts and distributions of existing OG forests lack resilience and adaptability to stressors and likely future environments (likely future environments leaves this exception wide-open to logging and treatment abuse).
- g. To restore or enhance attributes identified as culturally significant.
- h. to promote climate adapted species assemblages in areas where changing climatic conditions are likely to alter current conditions and change species assemblages over time (this could be the entire National Forest System).

All of these excuses/exceptions, and the ones listed in Standard 2.a (NOGA-FW-STD-02a, Standard 2.c (NOGA-FW-STD-02c), Management Approach 1.a (NOGA-FW-MA-01a), and Management Approach 1.b (NOGA-FW-MA-01b), are poorly and widely defined so that the FS can use them as an excuse/exception to log or implement treatments in OG/near OG forests at almost any time. This will happen and will over the long-term and short-term degrade existing OG/near OG forests.

This type of poor and broad definition of when OG/near OG can be logged or treated will induce many lawsuits and create obstacles when the FS should be collaborating with the public so that OG/near OG is protected and perpetuated.

12. Page 11, 1.11.4. Monitoring Directives, the use of nationally available datasets is fraught with problems since they aren't designed to provide accurate site-specific and local project-level information. The FS vegetation inventory has a problem because of this site-specific need which is addressed via large-scale monitoring systems that can't address the biodiversity and heterogeneity that occurs on landscapes in small scales.

13. Page 2.21. Establish Old-Growth designated Areas, the FS mentions Inventoried Roadless Areas. In the NFGT almost all of these areas are found in Sam Houston National Forest, are very small, and since most are in Red-cockaded Woodpecker Management Area 2, can be logged and otherwise treated with almost any forest practice. Inventoried Roadless Area designation doesn't guarantee OG/near OG forest/tree protection.

14. 2.3.2. Misconceptions Regarding the Proposed Amendment, the FS doesn't define what "uncharacteristic wildfire" means. The FS too often refers to frequent, low-level, ground fires for the NFGT when in fact moderate and severe wildfires and prescribed fires occur. Many are natural and not uncharacteristic of disturbance in the NFGT. This use of "uncharacteristic wildfire" to log or otherwise treat forests is one of the ways the FS "gets the cut out" and justifies more logging. The Sierra Club disagrees with this use of the severity and risk of fire to log or otherwise treat OG/near OG forests.

15. Page 17, 2.3.3. Alternate 1 - No Action, the FS needs to discuss the lack of will in implementation of the NFGT OG forest standards & guidelines (S&G). This issue is important for the entire OG forest proposal because currently and in the past the FS has ignored its responsibilities in Forest Plans for OG forests. How is the FS going to ensure that each national forest implements OG forest requirements when this doesn't happen today? This lack of will and illegality must be resolved if this OG forest issue is to be successfully implemented.

16. The FS shouldn't put the protection/perpetuation of OG/near OG forests as the responsibility of the timber/silviculture part of the FS. If this happens, then OG/near OG forests will be logged using the

excuses/exceptions mentioned above under 11. OG/near OG forest protection/perpetuation should be placed with those in the FS who protect natural resources like wildlife, endangered, threatened, and rare species, species of concern, soil, riparian and bottomland areas, wilderness, etc. We need people who are trained to protect/perpetuate OG/near OG forests and who don't see these forests as something to log for commercial and budgetary gain.

17. Page 24, Management Approach 1.c (NOGA-FW-MA-01c), the public should have the opportunity to review and comment on the "Adaptive Strategy for Old-Growth Forest Conservation" since this document will be key in the preparation and implementation of OG forest strategies.

18. Page 27, Objective 2, NOGA-FW-OBJ-02, Objective 3, and Objective 4, the time periods given are too fast and there won't be enough time to train and provide personnel with enough experience to ensure they know what they are doing for OG forest projects. This allows for faster logging of mature forests in the name of developing OG forests which will deplete the forests that could become OG forests in the future.

19. Page 40, Management Approach 1.b (NOGA-FW-MA-01b), the FS refers to a proactive stewardship purpose that "promotes climate adapted species assemblages in areas where changing climatic conditions are likely to alter current conditions and change species assemblages over time". Humans don't have the knowledge to implement such a purpose because we know so little about forests, climate change, and "climate adapted species assemblages". The FS should remove this purpose because we aren't able to fulfill it knowledgeably.

20. Page 48, Standard 2.c (NOGA-FW-STD-02c), Intent; Clarifications (in needed); What Changed (NOI to DEIS, if anything), the FS states that, "not all ecosystem types have the ecological capacity or ecosystem potential to achieve old-growth conditions in the plan areas" and then lists aspen. This statement, as it applies to Aspen, is incorrect. Aspen has root systems that are ancient and are some of the largest living systems in Nature and thus are OG and should be protected like other OG forests.

21. Page 53, 2.3.5. Alternative 3 - More Restrictive Standards for Old-Growth, the FS states that, "prescribed fire may be precluded if there was not an ability to thin and remove larger vegetation." In other words, the FS says that it needs to log OG to manage OG forests with fire. This is a false statement since OG forests can be burned and if some trees die this creates OG forest snags/downed wood and the patchy heterogeneity that OG forests provide to the landscape.

22. Page 57, 3.2.1. Ecology Affected Environment, Introduction, the FS refers to the "natural range of variation". The problem with this concept is that there is considerable controversy about what this is and where it applies. For instance, in the NFGT the assumption that historical Loblolly Pine and Shortleaf Pine forests were not dense, isn't supported via the information that we have when these forests were cut down. The FS has assumed a 1-5 year or more frequent burn interval when this was not the case in many instances. The FS has insisted that this is what must be done and has homogenized instead of created heterogeneity on the landscape for Loblolly and

Shortleaf Pine forests.

23. Page 59, 3.2.1. Ecology Affected Environment, Biodiversity, the FS refers to the need for OG forests but doesn't explain that if trees and forests must be old to be OG then why does logging old trees/forests by the FS play such a large role in allowing OG forests to grow. Ecological succession, Nature's answer to getting to OG forests, needs to be allowed to function as it normally does.

24. Page 65, Structure and Composition, the FS refers to "The ongoing mesophication in forests" as if this is a strange disease. This word really refers to natural succession and isn't anything to be alarmed about or say is bad. In 1950, Dr. Lucy Braun wrote a book entitled, "Deciduous Forests of Eastern North America". This book was based upon Dr. Braun's research and visits to some of the last OG forests in the Eastern U.S. and her study and description of it. In her book, Dr. Braun accurately and correctly stated that the forests in the South were sub-climax forests that succeeded to deciduous forests when disturbance wasn't sufficient to reduce and setback the growth of deciduous trees.

The mesophication of forests in the Eastern U.S. is simply Nature growing OG forests via natural succession and isn't a disease or problem that needs to be solved or made to seem to be unnatural and bad. The FS needs to read the literature and not think up excuses to log more OG forests.

25. Page 66, Structure and Composition, the FS recognizes that old trees used to be much more common when it says, "The rarity of old trees in comparison to historical conditions". Yet the FS instead of protecting these old trees wants to log them because they are too dense for the FS. Yet trees grow denser because of natural disturbances which is good, not bad, and shouldn't be cause for more logging and other environmental degradation and destruction.

26. Page 67-68, Spatial Distribution and Recent Change, the FS fails to discuss how climate change has affected forests in Texas, which is the western boundary of the "Great Deciduous Forest" and is where change is most likely to occur and occur most significantly.

Because forests have insects and disease doesn't mean they are unnatural and that this is bad. This is Nature's way of reducing density, creating openings, and providing more habitat and organic and nutrient inputs via snags and downed wood. It's okay for OG forests to have insects and disease. This is natural evolution and succession at play.

27. Page 71, Fire, the reason that Loblolly/Shortleaf pine, oak-hickory, and longleaf/slash pine forests have been most changed is because we have logged and burned these much more than other forests in the South and Eastern U.S. Human-caused disturbances rather than natural disturbances have reduced or eliminated most of these OG forests. We need less logging and not more logging like this FS proposal wants.

A fire every 35 years is not frequent, especially when we look at Ecological Classification Systems (ECS) which tell you that 1-3-year or 3-5-year fire rotations are very frequent or frequent and that many landtype phases have much lower fire frequency rotations like 10-20 years. A fire frequency of 10-20-years isn't what the Sierra Club or ECS calls frequent, but the FS does call it frequent. This is a key problem in over burning in the Eastern U.S. and what the FS calls mesophication, the definition of what s frequent fire rotation is.

28. Page 73, Extreme Weather, hurricanes, etc. aren't extreme weather. They are periodic weather conditions that are natural. We caused climate change which creates more of this weather which has many beneficial effects on OG forests and other forests. The FS must tell the entire story instead of being sensationalistic and stereotypical for these weather events can call them bad and "extreme weather". That's not scientific or the best available science.

29. Pages 75-77, Carbon, why does the FS talk about "carbon optimization" when the science tells us OG forests/trees store more carbon than any other successional stage in forest development? This failure to tell the truth isn't scientific and doesn't present the best available science. Logging isn't good for OG forests/trees no matter how often the FS says it is.

Oaks may have regeneration problems but in large part this is due to their being too large a part of the canopy since Chestnut and American Elm and other canopy trees died due to human-imported insects and diseases. The FS conveniently forgets this in its depiction of mesophication and oak decline. The need for more fire is evidently created by the FS to allow for more logging and burning in landscapes where burning was relatively rare. This isn't scientific or the best available science.

30. Page 80, Existing Riparian Management Direction, riparian areas, including OG forests, shouldn't be managed or logged but should be allowed to grow and evolve because of their water quality, wildlife habitat, biodiversity, landscape heterogeneity, and other benefits. Leave to Nature, what Nature can take care of best!

31. Pages 82-83, 3.2.2. Social, Economic and Cultural Affected Environment, the definitions that the FS provides for economic and social sustainability and sustainable recreation don't mean they are sustainable. Just because society has a capability to produce goods, relationships, and recreation doesn't mean this is good or sustainable. Sustainability must be based upon a foundation which is stable and which itself is sustainable.

Our baseline for the present society isn't sustainable and therefore anything that is created that is linked to an unsustainable baseline or foundation isn't sustainable. We have long overshot our population, economic, technology, and societal limits with a way of living based upon greed and emphasizes that money is the most important factor in everything. Everything that can be must be commodified, commercialized, and sold to the highest bidder. This isn't sustainable.

32. Pages 98-102, Ecological Consequences Common to All Alternatives and All Action Alternatives, the FS states, "Vegetation management activities [hellip] including in old-growth forests, are designed to foster ecosystems that are sustainable [hellip] These activities increasingly incorporate climate considerations".

These statements are false. More logging doesn't make OG forests more sustainable and in the NFGT there has been little implemented with regard to "treatments" that has been any different than what has been done in the past 50 years. It's the same old, same old. The FS doesn't state that the management that is specifically proposed produces better climate change outcomes.

FS logging of OG forests has long-term negative environmental impacts because it takes old trees (100-years old or older) and logs them. Then you have to wait at least 100 years for hopefully the same carbon storage and other benefits. This occurs while climate change conditions get worse because humans aren't reducing climate change air pollution in any serious manner.

The FS has proposed a logging program masquerading as a beneficial OG forest program. The FS admits that "there may be more attention to functioning ecological systems rather than individual OG stands" which means those stands get logged and become extinct. The FS proposes to play catch-up as climate continues to change by logging OG forests which are the best way to store carbon for long periods of time and release it gradually.

We need to save OG forests/trees right now and not log them. We see today, the effects of climate change from the past 20-30 years, because there is a lag in the impacts that climate change air pollutants have after they are released. The FS is like a dog chasing its' tail which it will never catch.

The FS wants to log the best OG forests now and hope that in the future as climate change worsens that what grows will be better than we have today, even though our climate and the ecosystems that rely on it will have changed. This puts us in a deeper hole. Leave OG forests alone to grow and store carbon and take care of NNIPS, water pollution, soil disturbance, boundary marking, etc., all of which will protect OG forests from death due to logging, burning, and treatments!

33. Page 103, Alternative 2, the FS documents how its' favored proposal, Alternative 2, conflicts with itself and OG forest protection when it states, "Alternative 2 contains NOGA-FW-STD-03 which prohibits proactive stewardship in OG forests for the purpose of timber production [hellip] Given the combination of NOGA-FW-STD-03 and the preservation of all tools that could help implement proactive stewardship activities, including commercial timber harvest". This means that the FS will log whenever it wants and call it whatever it wants via an excuse/exception and will have its' desired timber production and commercial timber harvest.

The public would never know this because the FS has given itself the perfect cover to log OG forests and claim it's really protecting OG forests. This isn't appropriate and is shameful to foist on the public. No wonder the public doesn't believe in the FS anymore.

34. Pages 103-107, Alternative 2 and 3, the Sierra Club doesn't support pipelines, transmission lines, roads, or ski area runs which are placed through OG/near OG forests. Ski area runs aren't as important as saving OG forests. The FS shouldn't allow any of these activities to destroy or degrade OG/near OG forests.

The Sierra Club is against the use of research natural areas for logging of OG forests or other treatments. Lodgepole Pine does have an OG forest and this should be protected by the FS and not logged.

The FS attempts to justify these alternatives and excuses/exceptions (proactive stewardship) to log OG forests by saying, "[hellip] listed above are likely to be minimal, and less than 5% of the total amount of OG across each forest."

This means that the FS, at a minimum, is willing to sacrifice 5% of 24.7 million acres of OG forests found in the National Forest System, which is 1.235 million acres. This is not acceptable and shows how the FS is biased against OG forests and wants to log whenever it can make-up an excuse/exception. The Sierra Club opposes proactive stewardship that logs 5% of OG forests in each national forest.

The FS states that "commercial timber harvest" can be done "for many different reasons, including ecological restoration, community protection in wildland-urban interfaces and high-risk firesheds, habitat restoration, protection of municipal water supplies, and to contribute to economic sustainability through the production of timber".

These are all reasons that the FS can use to log OG forests. This means OG/near OG forests have little or no protection via this proposal because the FS has enough excuses/exceptions to log OG forests whenever it wants to.

The FS doesn't say anything in this section about OG/near OG forest soil protection, fungi connectivity protection, soil fauna protection, soil flora protection, etc. The FS ignores the damage that logging and other treatments have on OG/near OG forest soils and doesn't have a plan to protect them from logging and other treatment impacts.

Logging isn't "ecologically necessary". The FS proposes alternatives that log first and then looks later at what the

changes have done to OG forest and how climate change has been affected by more logging and other treatments. This proposal is bankrupt and the Sierra Club opposes Alternatives 2 and 3.

35. Pages 108-114, Sensitive Species [hellip] and Species of Conservation Concern, vegetation management has long-term, not short-term, adverse effects because it degrades or destroys OG/near OG forests now which means that centuries will pass before trees that grow after logging will be the same age as the OG/near OG forests that were cut. This is the "cut now, we'll worry about it later" philosophy that the FS exhibits with this unacceptable proposal.

The FS assumes that "most native plant and animal species" will benefit due to logging OG forests but provides no data to document that this is true. Those species that are harmed aren't listed or discussed in the DEIS. This ensures that NEPA isn't implemented as required by law.

Logging OG forests for "Modifying fire behavior" isn't compatible with protection of OG forests. The FS advocates logging OG forests to save them when OG forests are fine the way they area. The FS states that, "None of the alternatives remove existing OG guidance from plans, but rather supplement the guidance".

The problem with this is, in the NFGT, that the FS doesn't implement or implement correctly the existing OG forest requirements of the 1996 Forest Plan. The FS should require oversight of the OG forest requirements that we already have in the NFGT, but it doesn't do this. There is no auditing and willpower required in the NFGT so that the FS obeys the law and does what's right.

The FS is right that the OG forest amendment doesn't prevent vegetation management actions. The FS, with this proposal, encourages an increase in logging and treatments (vegetation management) in OG and mature forests. With this proposal OG forests will be treated like all other forests and will be logged!

The FS fails to state clearly what endangered, threatened, sensitive species, and special of conservation concern will be most negatively affected and how it will ensure that they are protected. The FS uses words that things will be taken care of but these words don't do what NEPA requires.

This proposal does more than "encourages units" to plan and implement OG forest projects. It requires that units do within a certain number of projects in a certain number of years (in some cases 2 years and in some cases 10 years).

When the FS states that, "The proposed OG plan components are designed to increase ecological integrity, it doesn't have a clue about what will happen in a rapidly changing climate for not just OG forests but all other vegetation and living species. The research hasn't been done and won't be done because the FS doesn't commit

to this.

After this explanation about how the proposed OG forest alternatives will help OG forests, the FS admits that, "these provide more restrictive direction for OG forests, the more restrictive direction should be adhered to". Using the word "should" means that these more restrictive requirements are optional, since the word "should" is voluntary. The FS should use the required words "will, must, or shall" to ensure that restrictive requirements are implemented.

This proposal is bankrupt and won't accomplish what it states because right now, the NFGT doesn't implement the law for OG forests in the 1996 Forest Plan and there isn't any will to do so at the forest, region, and Washington levels. Many times, the NFGT doesn't "provide site-scale analyses and considerations of impacts to species" or for other natural resources when dealing with OG forest requirements. Region 8 appears to be ignorant of this, or supports this attitude, or doesn't care that such resistance exists.

36. Pages 120-122, Overall Social and Economic Sustainability, the FS states that, "[hellip] could no longer meet the definition/criteria in the future - for example, due to natural disturbance". The FS forgets that OG forests are more than big trees. They also contain disturbed areas and OG forest soils. Just because trees have been blowdown or in other ways killed doesn't mean the forest isn't still an OG forest.

37. Page 124, Tribal Collaboration, Including Co-Stewardship, the FS should implement all tribal treaty rights. It's important that OG forests should be allowed to grow wherever it's appropriate biologically and ecologically and not be limited by human desires.

38. Pages 125-126, 3.3.4. Consideration of Programmatic Cumulative Effects, the FS states that this proposal is contingent on logging and selling forest products. This means that the FS supports logging OG/near OG forests and mature forests to save them.

This is like destroying the village to save it. There is no need for logging existing OG forests and the Sierra Club supports allowing them to grow, store carbon, and remain one of our best methods for the reduction and adaptation to climate change. Nature doesn't need logging to create OG forests, it simply needs time and a lack of human manipulation, which brings degradation and destruction to OG forests.

Logging of OG forests ensures in most cases that fire risk will increase because reduced density of forests means less humid forests which allow more wind to fan flames during fires and makes OG forests more flammable.

39. Page 127, Unavoidable Adverse Environmental Effects and Irreversible or Irretrievable Commitment of Resources, the FS says there are no adverse effects and or irreversible or irretrievable commitment of resources. The FS forgets to state that its' policies, as outlined in these regulations, will allow for logging and treatment of OG/near OG forests and mature forests. This action sets the tone and will be a setback for OG forest maturation by 100's of years due to logging. This means people won't be able to enjoy and benefit from OG/near OG forests in their lifetimes. The FS admitted earlier in this DEIS that 5% of OG forests in national forests, about 1.235 million acres, may be logged. This is significant for a vanishing resource like OG forests.

40. Pages 127-128, Natural or Depletable Resource Requirements and Conservation Potential, the FS states there are "negligible effects" for this proposal when it allows logging of OG forests to make money for its' budget and degrades and destroys existing OG forests by at least 5%, or over a million acres or greater. This isn't negligible effects and shows how biased this proposal is.

The Sierra Club appreciates this opportunity to provide comments on this important matter. Thank you.

Sincerely,

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