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Comments: Comments - "Amendments to Land Management Plans to Address Old-Growth Forest System Draft Environmental Impact Statement (2024 DEIS)":

### 1. Critical Lack of Limits and Specifications in Forest Management

The 2024 DEIS fails to provide essential details and limitations on proposed forest management methods. It is well-documented by both agency sources and independent scientists that forest extraction practices like "thinning" and "fuels reduction" can actually increase the likelihood of high-severity fires. The omission of clear specifications and limits within the DEIS is a glaring oversight that seriously undermines the credibility and safety of the proposed management practices.

### 2. Incomplete and Misleading Analysis of Tree Mortality

The DEIS erroneously identifies wildfire as the primary threat to mature and old-growth forests while neglecting the critical ecological role of snags-standing dead trees formed by fire or insect activity. Snags are vital for the survival of numerous imperiled species, including the fisher and spotted owl, and do not inherently increase wildfire risk. By ignoring the importance of snags, the DEIS presents a skewed and incomplete analysis of forest health.

### 3. Failure to Address Cumulative Impacts

The DEIS completely disregards the tree mortality associated with thinning practices, leading to an inadequate assessment of cumulative impacts. This failure compromises the document's ability to accurately evaluate the long-term consequences of proposed management actions, making it an unreliable guide for sustainable forest management.

### 4. Selective and Misleading Use of Cited Reports

The DEIS relies heavily on the USFS report, "Analysis of Threats on Lands Managed by the Forest Service and Bureau of Land Management," while conveniently excluding critical findings that contradict its conclusions. Research consistently shows that intact, undisturbed mature and old-growth forests are more likely to burn with lower intensity compared to heavily managed forests. This selective use of data raises serious concerns about the objectivity and integrity of the DEIS.

### 5. Near-WUI Treatments Lack Critical Specifics

The DEIS proposes thinning or prescribed fire treatments over 6.2 million acres of old-growth forest within the WUI (Wildland-Urban Interface) without providing necessary details on the criteria for these treatments. The effectiveness of these actions depends on numerous factors, including the size of trees removed and the risk of spreading invasive species. Without this crucial information, it is impossible to accurately assess the impact on wildfire risk and forest health, rendering the proposal inadequate and incomplete.

### 6. Thinning Projects and Significant Carbon Losses

The proposed thinning projects in the DEIS are poised to cause substantial carbon losses, which are not properly accounted for in the context of wildfire risk and climate change. Instead of mitigating climate change, these

thinning practices could exacerbate it by releasing large amounts of stored carbon and diminishing the forest's capacity for carbon sequestration. This omission is both irresponsible and dangerous in the face of an escalating climate crisis.

#### 7. Neglect of Carbon Emissions from Forest Extraction

The DEIS shockingly omits any discussion of the carbon emissions associated with thinning and other forms of forest extraction, despite clear evidence that such activities can produce up to five times more carbon emissions than wildfires. This glaring omission is unacceptable, especially given the urgent need to curb carbon emissions to address the global climate emergency.

#### 8. Overlooked Post-Fire Regeneration and Biodiversity

The DEIS inaccurately portrays intense wildfires as purely destructive, overlooking the well-documented natural regeneration and biodiversity that often follow such events. Recent studies, for example, have shown abundant regeneration of giant sequoias in intensely burned areas, demonstrating the resilience of these ecosystems when left to recover naturally. By ignoring these processes, the DEIS presents a misleading and overly pessimistic view of wildfire impacts, which could lead to misguided management decisions.

#### 9. Flawed Assumptions About Wildfire Risk Reduction

The DEIS operates on the faulty assumption that vegetation management actions will necessarily optimize wildfire risk reduction. However, recent large wildfires have shown that treated areas can actually experience increased wildfire impacts. It is imperative that the DEIS critically reassess these assumptions and offer a more nuanced, evidence-based analysis of the relationship between management practices and wildfire outcomes. Without such a reassessment, the DEIS remains fundamentally flawed and unreliable.

[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>