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Comments: Comments on the 2024 DEIS for "Amendments to Land Management Plans to Address Old-Growth Forests Across the National Forest System Draft Environmental Impact Statement".

Omissions and unsupported biases weaken the intended protections.

1. The draft lacks standards and defined limits for "forest management", leaving a giant loophole to allow human intervention that has been shown to do more damage than good.

2. There is an implicit and unsupported assumption that "vegetation management actions" can "optimize wildfire risk reduction," ; in fact an increase in wildfire impacts within previously treated areas has occurred in recent large wildfires. Both agency[1] and independent scientists[2] published in the scientific literature have shown that forest extraction ("thinning," "fuels reduction") does NOT reduce fire severity, and in fact increases fire severity by exposing stands to increased wind and dehydration. These results caution against large-scale management focusing on extractions. 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.

3. A misguided focus on tree mortality fails to consider that snags (standing dead trees) and diseased/deteriorated trees are a natural part of forest ecology, provide critical habitat for endangered species such as fisher [3] and spotted owl, and contribute to a biodiverse forest litter habitat necessary to retain moisture and beneficial microbes. Even selective clearance disturbs these symbiotic ecosystems and compacts soils, lessening the success of saplings that regenerate naturally.

4. Impacts from "forest management" such as thinning are not evaluated AFTER those actions to assess and quantify cumulative impacts. There is no before and AFTER quantitative assessment to ensure that management activities are not further damaging stands instead of improving health. Thinning related tree mortality[4] is not mentioned or accounted for, therefore cumulative impacts are not being considered.

5. The totality of carbon emissions from thinning and logging activities is omitted. 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]. There is no mention of machinery, transport and milling emission related to "thinning" actions and other forms of forest extraction, which has previously resulted in 5 times more carbon emissions than wildfire[6].

6. Poorly defined standards. 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, introduction of invasive species on equipment, which can exacerbate rather than reducing the spread and severity of wildfire.

7. 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. In fact, high intensity fire is required to open cones and allow sapling regeneration; disturbing forest floors impedes this process.

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[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>

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