

Data Submitted (UTC 11): 9/11/2024 4:00:00 AM

First name: David

Last name: Yake

Organization:

Title:

Comments: Hello,

My name is Dave Yake. As a member of the USFWS and former employee of the Washington Department of Ecology, National Park Service, and as a former Sawyer myself, I cannot stress how much I am in favor of more restrictive protections for our dwindling old growth forests. Not just old trees, but the forests, their soil communities, their hydrology, their wildlife.

As a young man, I grew up in North Idaho, a state that celebrates it's natural wealth with one hand, while extracting that wealth with the other. I personally witnessed the decline and eventual extirpation of the Lower 48 Woodland Caribou in Washington and Idaho, in part due to habitat degradation for the express purpose of logging.

Reinstate Standard 1 in the final version of NOGA. Standard 1 from the Notice of Intent mandated that agency activities "must not degrade or impair" old-growth forests. Standard 1 was removed from the Draft Environmental Impact Statement (DEIS). Without a strong standard to protect the integrity of old-growth forests, NOGA offers little protections for old-growth forests and the wildlife that rely on them to survive.

Old-growth areas must not be removed from old-growth status for any reason. The DEIS does not require managers to preserve old-growth conditions. Management activities are allowed to destroy old-growth forests when "managed for the purpose of proactive stewardship." "Proactive stewardship" includes a laundry list of loopholes allowing agencies to degrade and impair old-growth forests to the point of losing old-growth status. Agencies must preserve and increase old growth not destroy it.

Include strong protections for mature forests. Mature trees are the future of old-growth forests. They must be protected to recruit future old growth. The Executive Order calls for protection of BOTH mature and old-growth forests, but mature forests are not protected or even mentioned in the current draft Environmental Impact Statement.

The Amendment must consider commercial logging to be the number one threat to old-growth forests. A comprehensive study (Berner et al) demonstrates that far more tree mortality is caused by logging than by wildfires and insects. Logging is the one mortality factor that is completely controllable.

This act must further Provide clear and measurable criteria for old growth that agencies and the public can use to identify old growth.

As we experience increased fire due to monocultured forests, desertification, and a myriad of problems related to erosion, our greatest tools in combatting this crisis are mature and old growth forests that have had time to grow, develop and become ecologically rich. When we log those, we undo literal centuries of work for only a temporary benefit. The idea that these economic projects benefit local working class communities has proven false, the only entities that benefit from logging these old growth stands are those that own and operate the logging communities, not the federal government, not the taxpayer, and not the health of the landscape itself. As a voter, taxpayer, recreationist and citizen of the US, I must stand firm in my desire to protect these forests from destruction and extraction at any costs.

After personally reading The Old Growth Amendment DEIS found at

https://www.fs.usda.gov/sites/default/files/fs_media/fs_document/old-growth-amendment.pdf I must express my

support and desire for the "More Restrictive (Alt 3)"

* The land management plans would be exempted or amended as described for the Modified Proposed Action (Alt 2).

* The plan components and content as described for the Modified Proposed Action (Alt 2) would apply, but Standard 3 would be updated to: "Proactive stewardship in old growth forests shall not result in commercial timber harvest."

Alt #3 specifically mentions restricting commercial timber harvest of old growth. As long as this plan is on the table, it must restrict commercial sale or it is at risk of becoming ineffective or non functional at it's stated goal of protecting old growth forests and the ecoregions they support. Commercial lumber, paper, and other industries that wish to seek out public resources now have sufficient alternatives that they no longer need the public's forests.