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Comments: Howdy,

After reading this draft EIS, appendices, and silvicultural guides, my opinion is this:

There are several things that I like about the plan, namely the thorough, well-written chapter on engaging with and respecting the rights of tribal entities, as well as the draft's acknowledgement that there are \*some\* very specific cases where active management needs to take place to maintain resilience, stand integrity, and old growth character. As well, I liked the system of categories that you all used to outline which forests would see changes to their management plans.

So before I get in to the parts where I have concerns, let me give an example that is in-line with that example prescription in the silvicultural guide to get you to understand my mindset.

What I see as a viable silvicultural treatment in old growth would be something along the lines of entering a Sequoia stand for fuels management with CTL logging systems, specifically cutting down the dense fir understory to reduce fuel loads, using thick slash matting and other Operational restrictions under C(T)6.24 / C(T)6.314# such as no logging equipment within 25 ft of any extant Sequoia to protect their fine root structure, followed by removal of included merchantable timber, lopping and scattering of that slash matting, and then a prescribed burn. That would be a valid prescription under the guide you've built, and an excellent management plan for maintaining resilient Old Growth character in that Sequoia Stand.

However, there are one or two things in this dEIS that concern me, and may lead to some form of litigation which I am sure that the ID team would wish to avoid in favor of producing a more sound document. This is namely some things I noticed in your categorization of changes charts in Appendix C cross-referenced to the Silvicultural guide.

Now this is an example, so do bear with me. I note that the Tongass is in Category 2, and I note that in the silvicultural guide that even-aged management is, while considered a last resort, allowed as an option. I've read the entirety of the Tongass Forest Plan, the Central Tongass LLA, the Prince of Wales LLA, and the South Revillagigedo dEIS. Yes, I'm both Alaskan and a Former FS Timber Sale Administrator so, I do things like that. Now I'm confident that you're all generally familiar with the outcome of the 9th Circuit decision regarding the POW LLA. we don't need to go into the fundamental flaws of those NEPA documents, but we do need to consider them as relevant data points in order to make this NEPA document at-hand a better product for the American People.

So with those NEPA decisions in mind, look back at those two items I mentioned (The Silvicultural guide and the categories in Appendix C). Consider that Old Growth Management on the Tongass involves clear-cutting Old Growth stands on extremely sensitive soil types, with steep slopes, on Karst bedrock, in a place which gets well over a hundred inches of rain per year. Consider the number of landslides, and the lack of any form of erosion prevention and control that happens when a stand is managed like that, and consider that the erosion in those areas is sometimes so severe, that there is no possibility of it ever regenerating to what it was.

My interpretation of this draft is that it would allow such activities to continue. Even-aged management is not conducive to maintaining old growth character. No two squirrels about it. It's appropriate for Quaking Aspen, Red Oak, Black Cherry, Paper birch, and those sorts of mid-tolerant trees, but it does \*not\* maintain or restore old growth character. This is but one example among many. I know of several EAs that have either been signed or are in draft phase that would have similar deleterious effects, but knowing that you all are having to read hundreds, possibly thousands of comments of this nature in order to get the ROD out, I'll offer a suggestion or two of directions you \*could\* go, that would preserve the overall integrity of your dEIS as well as protect these special places and guarantee their persistence on the landscape.

The most extreme option would be to remove even-aged management as an option. The only exceptions being for sanitation cuts after a stand-replacing event like a wildfire, beetle outbreak, or windstorm.

the second option, which I believe may be the best one, would be to require The Chief to sign off on any subsequent decision featuring even-aged management of old growth character stands, but possibly excluding cases such as the sanitation cuts mentioned above which could be placed at Regional Forester Authority.

Why? If you place that signing power at the Bigshot GS-Fantastic level and it'd make any timber beast think twice before making a volume grab because they know the RF or the Chief's office is deep in their business with a magnifying glass and a stethoscope.

These two options would allow the decision to go forward with a bit more armor against litigation.

through my years in FS, I understand the benefits of using the 2400 series timber sale contracts (6, 6T, 13, 13T) and, if properly supervised, believe that they \*can\* lead to excellent land management results that conservation-minded folk can, if grudgingly, accept. But please keep in mind that we are a short-lived species compared to these systems we are managing; future generations will see the scars that we leave on the land and every time we biff the execution, we leave our resources more vulnerable to collapse in the face of threats like climate change.

with my concerns being the above, I recommend Alternative 2 with minor guardrails put in place to prevent shenanigans. Barring that, I can live with Alternative 3.

please extend my regards to the entire Interdisciplinary team. You've put my tax dollars to good use and I see the level of care you've put into this document. I'm looking forward to seeing the ROD and your response to this public comment in the Appendix