

Data Submitted (UTC 11): 9/16/2024 4:00:00 AM

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Comments: My background: BA in English from the University of Washington, smoke jumper for several years out of the Missoula base, helped the Forest Service draft multiple-use areas in Washington State, long-time Montana citizen, with years of hiking, hunting and skiing there and in Washington State's North Cascades.

As I read through the National Old Growth Amendment (NOGA) it became apparent to me that the document has serious shortcomings in order to accomplish its stated intent to protect old growth forests. It needs to correct these deficiencies. The following are my comments and suggested solutions for improvements.

1. Stating a preferred alternative (Alt.2) while people are still commenting has the effect of prejudicing the comments by implying that the decision has been made. It makes me wonder if what I say matters. The document reads like a sales pitch for Alt.2.

2. The lack of a map delineating old-growth areas makes it hard for commentators and decision makers to see the scope and scale of the problem. It would be helpful if cartographers could depict regionally and nationally what we have left of old-growth forests and, ideally, what has already been lost. The relative scarcity of what we have left should dictate a more restrictive approach such as Alt. 3.

3. The NOGA's focus on "proactive stewardship" or "proactive management" seems to favor the timber industry. But these terms are vague and could mean almost anything from timber harvests to thinning projects to removal of hazardous fuels to prescribed burns. The Forest Service seeks to defray some of the associated costs through timber sales, though evidence shows that this can cost taxpayers money. The issue needs to be fleshed out.

4. I am concerned that the Wildfire Crisis Strategy would predominate over protecting old- growth forests and not be compatible with the intent. It could justify or excuse departing from protecting old-growth forests, which in many cases are already resistant to fire.

5. The artist sketches (page 97) of how fire is spread are simplistic and depict crowning fire before and after thinning. It might be used to justify departing from protecting old-growth. There is no discussion of the importance of wind and firebrand or ember spread. Thinning in some cases can allow wind to spread embers faster. Fire-wising of structures should be included. Fire scientists like The Fire Sciences Laboratory in Missoula should be consulted.

6. Wildland Urban Interface (WUI) definitions are changing and expanding to include remote areas (such as the Yaak area of the Kootenai National Forest which I have visited), where there is little human housing. This change needs to be addressed to make mitigation meaningful and not just drive more logging.

7. Timber industry trends (NOGA p.S14) clearly show that they have been gearing up to handle smaller logs. As mentioned in NOGA, most lumber consumed is from imports and state and private land. The timber industry in the west has declined due to longer growing times for trees to mature and has shifted more to the southern states. A proposed timber sale in the Yaak would require logs milled in Bonners Ferry, Idaho, where many of the mills have either been sold or are for sale. Much of the old-growth forest in the Yaak has already been logged. This is likely also the case in other national forests.

8. Climate refugia designations would go a long way toward conserving biodiversity and carbon sequestration. (NOGA p. 66) "At finer scales recent research has shown how climate refugia -- small areas that are relatively buffered from climate change -- play a disproportionately large role in the long-term persistence of species and ecosystems." This is long-view thinking and needs incentives to make it happen.

9. The issue of climate change needs more emphasis in the document. Priority should be given to the benefits of preserving old-growth forests as carbon sinks, including the carbon stored in soils. Section Z(c)ii of Executive Order 14022 directed the Department of Agriculture to "develop policies to institutionalize climate-smart management and conservation strategies that address threats to mature and old growth forests in Federal lands."

In conclusion, Alt.3 provides the clearest option if the intent is really to protect and foster old-growth forests. Alt.3 eliminates much of the vagueness that surrounds "pro-active stewardship" or management. It comes closest to keeping old-growth forests as old-growth, with all the ecological services that these forests provide from biological diversity to carbon sequestration.