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Comments: First, I would like to thank the USFS for its efforts to produce a monumental DEIS across 128 properties across the entire nation. I know that took a lot of work . And consider my comments feedback for improvement.

Comment 1:

There are many indications that it is not complete. Indeed you break the forests down into 4 categories of readiness to implement the NOGA. I live in Region 9, and I could not find what in particular were the implications of your classification of the region as level 3 except to say that changes in approach would be needed.

I encourage the USFS to reconsider its approach to the National Old Growth Amendment plan, project 65356. You are STILL unable to disconnect yourselves from the forest management methodology that you apply to every tree in the forest.

If you have any doubt about that, one only needs to look at Technical Guidance for Standardized Silvicultural Prescriptions for Managing Old Growth Forests on page 4 where the sections include the following:

"1. If the old-growth forest exhibits desired conditions and has high ecological integrity and is likely to be resilient to future conditions, then treatment may be deferred.

2. If the old-growth forest does not exhibit desired conditions or does not have high ecological integrity or is unlikely to be resilient to future conditions, consider treating the stand.

All stands considered for treatment, including those with deferred treatments, should be monitored, and evaluated."

The conclusion is that ultimately the forest service will decide whether a tree lives or dies if at all possible, and in Region 9 there are no quantitative descriptions of what IS old growth so that leaves far too much to human judgment.

Comment 2.

In Forest Ecology and Management Volume 548, 15 November 2023, 121373, Richard Birdsey argues that Middle Aged Forests in the Eastern United States have Significant Climate Change Potential. I request that the USFS consider the implications of leaving all middle aged and old aged trees in the public forests in the eastern US unmanaged for at least the next 30 years and that would match the intent of the Executive Order the best as it would put our forests to work in helping extract carbon during the bulk of the transition from fossil fuels to renewable energy resources.

Comment 3.

A recent article in the Proceedings of the National Academy of Sciences (Liu, Yunpeng et al, Biodiversity and productivity in eastern US forests, Proceedings of the National Academy of Sciences (2024).) argues that the measure of productivity in eastern US forests is the biodiversity of the tree species. This would indicate that the current differentiation in approach not only to age but to species is not in the best interests of productivity within the forests. This consideration should enter into the EIS for old growth.

Comment 4.

I urge the US Forest Service to adopt the following addition to its flow chart for silviculture consideration for old growth.

Is this area at least in the top 50% of old growth areas in the forest? If yes, leave alone and do not try to manage that area. Otherwise follow your old growth silviculture document. I think we need to give Creation a chance. I think that millions of years of evolution will enable the forest to adapt if needed. Then we compare nature to the human understanding of forests. This is not to say that humans add nothing, but to assume that humans will make the right choices is not wise either. As we define sustainability today, most of the actions relate to human activities. From the standpoint of evolution and ecosystem interactions we have not used nature as a decider in sustainability. This should be a substantial part of the approach. And we won't get significant old growth forests unless we allow them to become old growth forests.