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Organization:

Title:

Comments: Dear President Biden, Agriculture Secretary Vilsack, and U.S. Forest Service Chief Moore,

Thank you for this opportunity to comment on the Draft Environmental Impact Statement (DEIS) entitled "Amendments to Land Management Plans to Address Old-Growth Forests Across the National Forest System." As Drafted, the DEIS fails to include a range of alternatives that would protect mature as well as old growth forests from commercial logging, other management, and extraction-related actions, and is therefore inadequate as a document that addresses climate change. Logging-related impacts are also ignored. Overall, the plan lacks essential details that are well-established in the scientific literature, including the following:

[middot] Forest extraction ("thinning," "fuels reduction," clear-cutting) actions have resulted in high severity fire when they burn - as shown by government scientists[1] as well as independent scientists[2] published in the scientific literature.

[middot] Careful field based measurements show that carbon emissions from logging (including commercial fuels reduction/thinning), far exceed carbon emissions due to wildfire[3], thereby showing the climate impacts of logging have been far greater than wildfire.

[middot] Cumulative impacts of commercial extractions including tree mortality[4], loss of soil, loss essential understory, and associated biodiversity.

[middot] Scientific data shows that an abundance of standing dead trees (snags) do not increase fire spread or fire severity.

[middot] Scientific data showing that an abundance of snags (standing dead trees created by wildfire and/or insects etc.) provides critical habitat for multiple listed and imperiled species including fisher [5]and spotted owl.

[middot] Restoration actions, as described in the DEIS, include clear-cutting[6] - has negative impacts clearly identified in the scientific literature.

[middot] Post-fire regeneration has been demonstrated in multiple studies (e.g., abundant giant sequoia regeneration[7] within intensely burned patches).

Best regards,

Maya Khosla

[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.congress.gov/117/meeting/house/112540/witnesses/HHRG-117-II10-Wstate-LawB-20210429.pdf>

[4] <https://www.mdpi.com/2073-445X/11/7/995>

[5] 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

[6] <https://therevelator.org/postfire-logging-ecology/>

[7] <https://www.mdpi.com/2571-6255/7/2/44>