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Title:

Comments: I'm glad to see this effort by the USFS to replace the antiquated forest-by-forest approach to old-growth and mature forest conservation. It's a step in the right direction. However, without greater clarity and stronger language, it falls short of protecting mature forests of today so that they can become the old-growth forests of the future. I support a stronger, more protective version of Alternative 3 in the DEIS.

**** Whenever possible, we must AVOID logging mature and old-growth trees, in all forest types. ****

In forests, savannas and grasslands alike, the USFS, BLM and state land agencies across the country must collaborate more with local indigenous communities whose ancient land tenure has led to an essential understanding of when and how to practice cultural (prescribed) burning. Wherever it's appropriate, we need more planned fire, including at times in mature and old-growth forest types. We do not need more logging. That's as true in Alaska's Tongass, with its intact old-growth watersheds, as in North Carolina or New Mexico, where only fragments of mature and old-growth forest remain. <https://ak.audubon.org/news/tongass-national-forest-and-new-old-growth-protections>

We need to avoid some current policy traps, like removing small-diameter trees from areas of old-growth where size doesn't necessarily equate to age.

I live in Western Montana, east and south of a shrinking number of isolated patches of old-growth forests. In the Yaak Valley of Northwest Montana, the Black Ram logging project would cut mature and old-growth forest. Here's an excerpt from an article about that controversial project, which is on hold:

"Leslie Caye, a member of the Kootenai, Yakama and Nez Perce nations, agrees. "It's time to consider the concept of leaving things alone," he says. "Let the forest be, without interference, without interruption." Caye grew up on the Flathead Indian Reservation southeast of the Yaak and on the Yakama Reservation in Washington State. Today he develops Kootenai language and culture programming, as well as curricula for youth, on the Flathead reservation. The Yaak, he says, "is a part of our ancestral lands-lands that we lost, that were taken from us." In times past, he says, "my people would go up there by the thousands to the Yaak Valley, and they would sing for a couple of nights in a row. For generations two forms of ceremony took my people there: the summer drumming ceremony that was part of our Sun Dance and what you might call, in layman's terms, the vision quest, which helped us understand how to live as a Kootenai person. Our holy lands, you might say, are up there in the Yaak, including in Unit 72."

Caye says, "We want to be able to return to that place, and other sacred places, to practice our cultural

lifeways.... This is part of the process of reclaiming our identity as Kootenai people-that rejuvenating religious force that is the underpinning of who we are. But if the forest is being logged, how can we return there to practice our ceremonies? This, too, needs to be a part of the conversation."

<https://www.scientificamerican.com/article/can-forests-protect-themselves/>