Data Submitted (UTC 11): 9/21/2024 3:58:16 AM First name: Ed Last name: Bowen Organization: Title:

Comments: EIS No. 20240110, Draft, USFS, NAT, Land Management Plan Direction for Old-Growth Forest Conditions Across the National Forest System, Comment Period Ends: 09/20/2024, Contact: Jennifer McRae 202-791-8488.

First Point, this comment is submitted as a matter of record that I have provided such under the terms stipulated in the Federal Register Notice of Availability 21 June 2024 that does not stipulate what time zone or what time the comment period ends on this 20 September 2024; therefore, any and all up to the International Dateline in the Pacific is that determination is my claim. For this notification process the agency only provided guidance, which is not regulatory, in the web posting of how to comment: Your comments are requested through 9/20/2024 11:59:59 PM (Eastern Standard Time).

Point of Order: The agency contact did not respond to attempts to clarify this matter. And upon attempting to submit my comments in a timely manner to what is likely the agency's perception of not later than time, with the notice of availability being a product of the EPA and not this agency, attempting to submit through the online Federal Register posting rejects saying in short time is up...but it's not. That is just how vague and deceptive this government is operating, and I'm asked to have trust in this action; I'm not that stupid.

Second point as a matter of summary: I object to this action with the stipulation it appears I am not authorized to object; so, consider if that is true then my representative form of government has failed its constitutional responsibilities and accountability to this citizen as an individual. Even if the agency disagrees (my opinion the typical solicitor's viewpoint likely) I will not be denied my First Amendment Rights and thus my objection is at a minimum is an expression of this underrepresented citizen's opinion. (Environmental Justice claim)

Part B of Second point is such this action is a devastation to my freedom and survivability, creating complete unsurvivable conditions when the classification of the Forest became a tool to drive an unauthorized agenda by the agency: Congress has never given the authority to the agency to prioritize Indigenous Knowledge, thus a legal ramification now subject to Statutory Interpretation versus this action's Policy Interpretation; and in the matter of the Congress's failure in its core responsibility to authorize the agency it is now very likely a matter of the Nondeligation doctrine. I don't recall voting in giving up my culture in these policies either. This creates a bias towards the citizen; the agency becomes an accessory to violations of my individual treaty rights, the lack of representation in the environmental justice requirement as a minority and underrepresented population. This is just one of several areas of the abuse the agency is taking in this action, and no analysis was conducted to identify many of those areas that Congress has not authorize the agency to do so but implemented by the agency on such important matters.

Point Three: It is evident the materials presented in this approach to addressing our valuable National Forest, at both the micro level and the forest as a whole, this is a workaround to create more non-useable wilderness protocols that violate the legislative role the Congress has to designate wilderness under their duties afforded by the Constitution. But also, by a burdensome affect from the deferment to wilderness protocols because of an insinuation by the agency it must do so under an un-authorized set of rules. The scientific and economic data is significant to support this wrongful practice by the agency in such interpretations. The economic failure and the quality of life since the initiation of the original plan have not been evaluated to determine what remedies to impacts suffered are addressed or solved by any such altered management strategy.

Part B of Third Point: This action beyond "No Action" alternative, contributes negatively to the outdated Region's Forest Plan, in my case the NorthWest Forest Plan the Clinton Administration forced down our throats and now

30 years later there's an amendment process that is totally exclusionary of balanced representation (the FACA advisory committee) that results in further killing off the opportunities each and every citizens should benefit from this public land, especially in regards to Olympic National Forest and the burden this creates when it has a sibling adjacent (Olympic National Park) that locks up 95% of the sibling's assets in to wilderness-minimum tool-let it burn syndrome. Owls with spots and now Marbles of murrelet (stated in a form of satire) will never succeed in this most northwestern corner of the lower 48 with humans killing off other humans' opportunities and freedoms. A principal that exists is survival of the fittest is not addressed by any aspects of this action. The timber wars have never ended, the NWFP did not create peace let alone a functioning environment to co-habitate in; the alternatives submitted are continuing to fuel that war from a supply chain aspect for the resource and the pacification of a select interest that just wants me to accept more restriction; that is a taking.

Part C of the Third Point: What a work around to how a poorly representative from one in the Senate and one from the Congressional district keeps forcing "WILD OLYMPICS ACT" bills, year after year after year, down our throat that is nothing short of being a threat; this particular action supports that back door strategy and thus I the individual am not represented and fuels the reality of that threat. This action will directly provide another improper and illegal activity of the administration, very similar to the call in to question topic, of designating National Monuments outside of Congress.

Point Four: Rebranding and confusion, no confidence this solves the presumed problem since that problem isn't well defined and understood. Just what is Old Growth and in who's mind? Just what is Mature Forest and in who's mind? Who are you the agency to make that determination; it should and must be the Congress as a starter and then the voice of the people is represented. Any reference to the concept of Best Available Science does not create any level of confidence just as the point brought up, as one example, in regard to Indigenous Knowledge. Therefore, the action based on science is misrepresented if that is the agency's determination. The current designated harvest units in Olympic National Forest are not released for their purpose, having not even received Adaptive Management practices the original plan promised a solution, and not more lock- it-up-reality.

Resources such as timber are not a byproduct of some other purpose the agency and thus this action intends to prioritize, the purpose by law is not in alignment. In the local case the Late Successional Reserve and the Adaptive Management with the bias on no Matrix Forest management is the failure of the Old Growth plan for Olympic National Forest.

Thus, submitted by the Notice of Availability Period of Comment this 20 September 2024 Pacific Time Zone. Every ounce of this submission is relevant.

Olympic National Forest Affected Citizen, devastated in the Nineties with the roll out of the Northwest Forest Plan and now threatened by this further degradation of my freedoms and pursuits, this attempted action that becomes an accessory to that previous crime committed.