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August 30, 2022

RE: "Request for Information (RFI) on Federal Old-growth and Mature Forests."

Dear Secretary Vilsack and Secretary Haaland,

Okanogan Highlands Alliance (OHA) is happy to provide comments to inform the response to Executive Order Strengthening the Nation's Forests, Communities, and Local Economies.

OHA is a public interest conservation organization that serves the Okanogan Highlands area of the Tonasket Ranger District in north-central Washington State, and beyond. Our mission is to encourage and support education and public participation in decisions involving the integrity, sustainability, and prosperity of our community and the environment. OHA fosters conservation of natural resources and takes action to prevent environmental degradation. We offer the attached comments to provide our input about how to define and manage old-growth and mature forests on Federal lands.

Old-growth and mature forests should be defined and managed to avoid inadvertent damage to the few remaining old-growth stands on the forest. It would be tragic if these unique ecosystems were irreparably damaged because of failure to do the analysis, especially considering the unique characteristics of old-growth as a repository of ecological record and a refugia for flora and fauna that can be found nowhere else.

One of OHA's strategies to protect the environment is to help educate the public by creating opportunities for people to get out into nature and learn about what they find there. We frequently bring groups onto the National Forest in the Okanogan Highlands on field trips with experts. Recently we had a forest ecologist on such a walk who wanted to bring the group into an old-growth stand to explain some of the characteristics of the natural system that could be found therein. Unfortunately, there was none to be found within a reasonable distance from Tonasket in the Okanogan Highlands. **We encourage the agencies to define and manage old growth forests to prevent new levels of degradation of an incredibly special and already rare public resource: old-growth forest stands.**

While there may be an old-growth stand that might require treatment, it should be considered only after analyzing the site-specific resource issues and analyzing all other reasonable alternatives. **We suggest that forest-wide standards and guidelines maintain a strict standard of care for mature and old growth forests, and that any exceptions to strict standards and definitions be scrutinized and approved on a small, site-specific level.**

The agencies **should create detailed maps** with all the old-growth and mature forest areas indicated so that federal land managers and the public can assess the scope of any proposed actions on these forests.

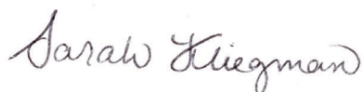
Protection of old-growth stands, which are rare and sensitive remnants of a forest that was at one time dominated by old-growth, should be prioritized over easing restrictions on treatment and timber harvest on a forest-wide scale.

While OHA shares the goal to maintain healthy forests in a fire-dependent landscape, we are concerned that harvesting marketable timber in an old-growth setting is not designed to improve forest health, given that old-growth forests are, by nature, more resilient to fire. An important characteristic of a healthy forest is the diversity of habitats. Undisturbed old growth forests, including standing dead trees, are a critical component, a piece of the mosaic, that make up a healthy forest and should not be open forest-wide to treatment and sale. **Allowing commercial timber harvest of any kind in ecologically unique old-growth environments should not be allowed.**

Fire resiliency is important across the landscape and can be achieved without harvesting commercial timber and firewood in the few and precious old growth stands that remain in the forest. Efforts to improve fire resiliency should be focused on the majority of National Forest lands that are not old growth.

Any action that involves action on mature or old growth forests (scheduled or unscheduled) should involve a full NEPA review (EA or EIS). There should be no exceptions to the environmental review process for mature or old growth forests. If treatments are going to be allowed in old growth, requiring treatment of natural fuels to maintain old-growth characteristics as described in the definition of “old growth stand” is a critical component. However, we are concerned about the consequences of conducting treatments on old growth stands because of our observations of old growth stands that were treated as part of the Healthy Forest Initiative (which was intended to reduce the threat of wildfires) on the north flank of Mt. Bonaparte (Red Mill Timber Sale). There, the treatment significantly changed the characteristics of the old growth stands so that they are now unrecognizable as old growth since they lack the diversity that is found in old growth stands.

Sincerely,

A handwritten signature in cursive script that reads "Sarah Kliegman".

Sarah Kliegman
Okanogan Highlands Alliance
co-Executive Director