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Director
Ecosystem Management Coordination
United States Forest Service
201 14th Street SW
Washington, D.C. 20250

Submitted via webportal: <https://cara.fs2c.usda.gov/Public//CommentInput?Project=65356>

RE: Comments Amendments to Land Management Plans to Address Old-Growth Forests Across the National Forest System Draft Environmental Impact Statement

To whom it may concern:

Thank you for the opportunity to provide input on the Amendments to Land Management Plans to Address Old-Growth Forests Across the National Forest System: Draft Environmental Impact Statement (DEIS). Cascade Forest Conservancy's (CFC) mission is to protect and sustain the forests, streams, wildlife, and communities in the southern Washington Cascades through conservation, education, and advocacy. We represent over 12,000 members and supporters, mostly based in the Pacific Northwest. We focus much of our efforts on the Gifford Pinchot National Forest.

As currently written, the alternatives in the DEIS do not meet the intent of the amendment which is to “foster the long-term resilience of old-growth forests and their contributions to ecological integrity across the National Forest System.” DEIS, S-1. Substantial edits are needed to ensure the proposed amendment does in fact achieve its purpose and need. Below we focus on a few of the more egregious problems with the amendment language that are preventing the proposal from meeting its stated purpose. CFC requests the Forest Service address these issues in the Final Environmental Impact Statement.

I. Improper focus on proactive stewardship for all old-growth

CFC is disappointed to see no changes were made to the active stewardship focus for all old-growth types. The draft amendment and all of the alternatives continue to place an improper

focus on proactive stewardship in old-growth forests of all types, even when passive management is the most appropriate type of management. Although some types of old-growth, like frequent fire forests, could potentially benefit from proactive management to return those forests to their more natural condition, it is certainly not the case that all old-growth should be actively managed. For example, forests west of the Cascade crest in the Pacific Northwest do not need active management and indeed could be harmed or their old-growth status undermined by logging. Standard 2 should be changed to make clear proactive stewardship should only happen when it would benefit old-growth characteristics and that sometimes passive management is the appropriate management direction.

Additionally, some of the examples or reasons for proactive stewardship are too broad and could lead to a degradation of existing old-growth or a loss of old-growth status. For example, section viii's purpose to promote "successional pathways and stand development" could be read to allow completely resetting the old-growth stand to an early successional stage. DEIS, 29. Having language that would allow for resetting the successional clock of existing old-growth is counter to the purposes and intention of the amendment and counter to the intentions of Executive Order 14072 which, as summarized in the DEIS, directed the Forest Service to "develop policies to institutionalize climate-smart management conservation strategies that address threats to mature and old-growth forests on Federal lands" DEIS, S-1. Allowing the successional clock of existing old-growth to reset through active management would not meet the DEIS's goals and White House directives. Therefore, section viii in Standard 2.a should be removed from the proposed plan components.

II. Exceptions in Standard 2.c are too broad

Not only does the amendment place an improper focus on proactive stewardship, it also creates exceptions to the proactive stewardship direction that are too broad. In fact the only exception that is appropriate in part is exception iv "for culturally significant uses as informed by tribes." DEIS, 31. All other exceptions should be removed from Standard 2.c to ensure the amendment achieves its objectives. Of particular concern is exception vi in Standard 2.c which would exempt management in old-growth when "in cases where it is determined – based on best available science, which includes Indigenous Knowledge – that the direction in this standard is not relevant or beneficial to a particular species or forest ecosystem type." DEIS, 31. This exception by the text is incredibly broad and could be used by line officers to exempt meaningful amounts of old-growth from the standards altogether for a wide variety of reasons. Without parameters, or an explanation of what this exception is meant to do, exception vi creates what could be an incredibly large loophole. CFC requests the Forest Service delete exception vi and all other exceptions (except iv for tribal use) to prevent circumvention of the standards and to help ensure the purpose and need of the amendment is met.

III. Return omitted previous Standard 1

The DEIS removed previous Standard 1 stating that it was redundant with Standard 2.a. DEIS, 28. CFC disagrees. Previous Standard 1 which prohibited a loss of old-growth characteristics is an important piece of ensuring the amendment meets the purpose and need. Currently nothing in the standards prevents a loss of old-growth characteristics when doing stewardship activities. Although the proactive stewardship requirement lists reasons or purposes for stewardship activities, those stewardship actions are allowed to degrade old-growth and the DEIS acknowledges that there is “no requirement that areas continue to meet the definition of old-growth when managed for the purposes of proactive stewardship.” DEIS, 16. Therefore, previous Standard 1, which included language prohibiting a loss of old-growth characteristics, should be added back into the amendment. Without this prohibition the amendment will continue to struggle to meet its intended purpose to foster abundant and resilient old-growth across the country.

IV. Mature forest conservation

The proposed action does not include any meaningful measures to conserve existing mature forests even though one of the stated purposes of the amendment is to:

[f]oster ecologically focused management across the National Forest System by *maintaining and developing old-growth forests while improving and expanding their abundance and distribution* and protecting them from the increasing threats posed by climate change, wildfire, insects and disease, encroachment pressures from urban development, and other potential stressors, within the context of the National Forest System’s multiple-use mandate. DEIS, S-6, 7 (emphasis added).

Although there is an identified purpose in the DEIS to expand the abundance of old-growth, the proposed Desired Conditions do not mention having any more old-growth on the landscape than we currently have now and there is no binding language in any proposed plan components to ensure recruitment of additional old-growth overtime. Therefore, the purpose identified in the DEIS to expand the abundance of old-growth will not be satisfied by the amendment’s proposed plan components. CFC requests the Forest Service add language to the Desired Conditions and other relevant plan components regarding expanding the abundance and distribution of old-growth. We also request language be added to the relevant plan components requiring a certain percentage of mature forest per national forest be conserved as future old-growth. These changes are necessary to ensure the stated purposes of the amendment are met.

V. Conclusion

In conclusion, CFC supports the stated intent of the proposed action to protect existing old-growth and recruit new old-growth forests across the country. However, none of the current alternatives currently meet the identified purpose and need. We request the Forest Service address these flaws within the amendment to ensure the proposed plan components protect existing old-growth and recruit more old-growth overtime inline with the identified purposes of this amendment and EO 14072.

Thank you for your time and consideration.

Sincerely,

A handwritten signature in black ink, appearing to read 'AS', with a stylized flourish extending to the right.

Ashley Short
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