

Director, Ecosystem Management Coordination
U.S. Forest Service
201 14th Street SW, Mailstop 1108
Washington, DC 20250-1124

September 8, 2024

letter submitted electronically via webform
<https://cara.fs2c.usda.gov/Public//CommentInput?Project=65356>

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

Dear Director:

I am commenting on the Amendments to Land Management Plans to Address Old-Growth Forests Across the National Forest System Draft Environmental Impact Statement, also known as the National Old-growth Amendment (NOGA), from my local perspective based on nearly 50 years of engagement with the management of the Gifford Pinchot National Forest, including the peak logging years of the late 1970s and 1980s when forest supervisors sought to liquidate the old-growth forests as quickly as possible. I have a file drawer full of copies of my comment letters on various management plans and timber sale proposals. My comments were routinely ignored by land managers who dedicated themselves to market-oriented logging and the conversion of natural forest ecosystems into timber plantations. Multiple use was just an afterthought to logging. Little thought was given to the loss of biodiversity, to the ecological health of an extremely complex system, which inevitably resulted from replacing ancient forests with same-aged plantations of uniform species of trees that more closely resembled crops of corn. The arrogance of forest supervisors was astounding as the Gifford Pinchot National Forest was logged at rates that could not be sustained for the long term. In roughly 40 years, land managers transformed the national forests of the Pacific Northwest from an estimated 70 percent old-growth in the early 20th century to just five percent remaining today.

The reputation and image of the Forest Service as a trusted government agency slowly eroded but the agency was blind to its loss of credibility. The failure of the Forest Service to respond to public values, to recognize the inherent value of old-growth forest, to acknowledge the harms resulting from transforming a rich ecosystem into a uniform “crop” led to the last resort available to the public – the courts --and today, to the President’s executive order.

I urge the U.S. Forest Service to significantly strengthen the NOGA to ensure meaningful protection for remaining old-growth forests. The draft amendment allows forest managers to do the bare minimum to conserve old-growth forests. Based on past performance, the U.S. Forest Service cannot be trusted with all the exceptions to old-growth protection and the refusal to protect mature forests to recruit additional old-growth undermines the objectives of the NOGA and contradicts the direction of Executive Order 14072 to protect the nation’s remaining old-growth and lay the foundation to increase its abundance and distribution. Further, what I see in the NOGA is far too much meddling and not enough passive management.

My specific comments follow:

1. Every acre of mature and old-growth forest on federal lands, including when those areas eventually burn or are reset by natural disturbances, must be protected in perpetuity. Because the vast majority of old-growth forests were carried off the landscape on logging trucks, the Forest Service must now protect all remaining old-growth trees through affirmative direction in this amendment.
2. Address the deficit in old-growth forests. The Desired Conditions should include statements about increasing the amount of old-growth forests across the National Forest System and particularly in the Pacific Northwest.
3. Eliminate exceptions to protection. The economic incentives for logging old-growth must be removed. These exceptions are too broad to protect old-growth forests over time and could be used to exempt large areas from this national old-growth amendment. While some ability to apply site-specific nuance, such as public safety, may be warranted, this exception could easily become a large loop-hole unless it is given specific parameters.
4. Provide more clarity regarding “proactive stewardship” and address the need for passive management by adding it to the definition. Proactive stewardship is used as a catch-all term to describe restoration actions such as thinning and prescribed fire that may not be appropriate everywhere. Logging old-growth trees to save stands from potential threats is a choice not supported by science. The NOGA needs more rigorous guidelines for proactive stewardship. Further, the non-degradation standard should be reinstated wherever proactive stewardship is applied.
5. Passive stewardship is a choice that is only included in the NOGA as an after-thought when it should be the primary choice in some places, such as forests on the west slope of the Cascades Mountains in Oregon and Washington. Dr. Jerry Franklin has said, “At this point in time and given their special nature, all remaining naturally regenerated mature and old-growth forests should be left to continue their natural development.” He repeated that sentiment at the Forest Service field meeting for the NOGA on July 10, 2024, as Forest Service staff talked about various proactive stewardship activities. The draft amendment has too much focus on intensive management, which is what got us into the current situation, when restraint also in important.
6. Recognize major disturbances to the landscape as opportunities rather than catastrophes. One of the primary ecological lessons from the 1980 eruption of Mount St. Helens is to simply let nature alone and let biological legacies restore the landscape. Post-disturbance salvage logging must be eliminated entirely. Our forests in the Pacific Northwest co-evolved with catastrophic events like volcanic eruptions, windstorms, floods and wildfires.
7. Mature trees and mature forests must be protected. The NOGA does not include protection in any alternative and does not address recruitment to increase the amount of old-growth. The NOGA should create a collaborative and science-based process for identifying and prioritizing areas on each national forest that can restore old-growth that has been lost to

past mismanagement and, in the interim, to provide habitat connectivity between fragmented old-growth stands. One option is to leave plantations alone and view time as the great healer.

8. The NOGA should require forest plans to be updated using the best available science regarding climate change, wildlife habitat needs, and old-growth forest development, conservation and resilience.

The NOGA presents a once-in-a-generation opportunity to realign forest plans to safeguard mature and old-growth forests, slow climate change, protect wildlife habitat, improve aquatic ecosystems, and enhance outdoor recreation.

Sincerely,

Susan Saul