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

September 19, 2024

re: **#65356 - Land Management Plan Direction for Old Growth**

I am writing to express my concerns over the Draft Environmental Impact Statement (DEIS) for the U.S. Forest Service (USFS) proposed Amendment to Land Management Plans to Address Old-Growth Forests Across the National Forest System.

Since the 1980s, I have submitted comments on hundreds of timber sales, mining operations, ski area expansions and other USFS development proposals. I have also submitted comments on a number of revised Land Management Plans (aka Forest Plans). I have visited most National Forests across the country and have been dismayed at how little old growth habitat the USFS has retained to sustain species dependent on these habitats.

Most forest lands that are private or in non-federal ownership have no mandate to manage for multiple-use or ecological functioning. These lands are therefore heavily logged and have virtually no quality habitat left. This increases the need for federal lands to preserve old growth wherever possible. Unfortunately, because of more than a century of intensive logging, most National Forests throughout the country have also been depleted of old growth.

A sad example is the Black Hills National Forest. Nearly every acre of this public forest has been logged and most areas have been logged repeatedly. According to USFS stand inventory data, less than 1% of this National Forest remains in an old growth condition, and the small amount that remains is mostly found near roads ... as "beauty strips" to give passersby the illusion the forest is old and healthy. A small amount of additional old growth is found in areas where site conditions prevented commercial logging (e.g., steep slopes), but these conditions also make these areas unsuitable for many wildlife species that depend on old growth.

Because these habitats are so vital to so many species, because these habitats are cherished by so many Americans, and because the federal government has allowed so much of these habitats to be destroyed for private profit by special interests comprising a negligible percentage of the US population, **the USFS should ban the future removal of any old growth nationwide.** It is time to step up and become a true force for forest conservation and shift away from privatizing and commodifying the trees-as-resources on these forests.

However, the USFS should go farther because, as noted, most National Forests have been depleted of old growth. For this reason, **the agency should also identify mature forest areas (e.g., SS-4B and SS-4C) and conserve them so they will become old growth in the shortest amount of time.** Managing mature stands to become old growth will also help replace some of the current old growth stands that will be lost due to catastrophic fires amplified by climate change.

Protecting old growth and mature forest stands will comply with President Biden's 2022 Earth Day Executive Order 14072 which committed the Executive Branch (which includes the USFS) to "conserve America's mature and old-growth forests on Federal lands." Even though the DEIS states (page S-3) the USFS is proposing this Amendment specifically because of this Executive order, in my assessment none of the alternatives considered in the DEIS would honor the commitment to conserve mature and old-growth forests on Federal lands. Astonishingly, it appears **the agency's preferred alternative would significantly increase logging levels in the mature and old growth stands.** See Figure 19 in the DEIS Threats Analysis. Alternative 3 would

prohibit commercial logging in old growth, but it allows these habitats to be destroyed by other activities, and it offers no protection for mature stands as replacement old growth.

In short, the agency has not evaluated a full spectrum of alternatives required by NEPA. NEPA was intended to be an action-forcing mechanism to help the federal government protect and restore the environment. Yet the USFS has not even developed an alternative that would best protect and restore the old growth components of the forest environment. By only considering a narrow spectrum of alternatives that all allow destruction of old growth habitat (and no protection of mature forest habitat to replace old growth destroyed by future fires), the agency is unfairly shifting the middle ground solution towards more logging and development.

Moreover, the agency is also proposing to log trees on the National Forests for “energy production” (DEIS at 75). Presumably, this would turn trees on public forests into fuel pellets for use in things like biomass boilers. However, studies have found biomass boilers are less efficient and emit more carbon per Btu than other carbon fuels. It would even release far more carbon than burning coal. See, e.g., <https://www.pfpi.net/carbon-emissions>. For these reasons, **the USFS should drop any proposal out of the Amendment about using trees and other vegetation from the National Forests for “energy production.”**

Beyond the ecological need to maintain old growth and mature forest habitats to prevent species from declining, protecting these habitats will also help the federal government achieve the climate change targets. These habitats store massive amounts of carbon that would be released to the atmosphere if they were logged.

The DEIS presents a biased and invalid assumption that logging these areas would reduce carbon emissions. This is a specious argument the timber industry has been using for years. The Black Hills offers a case study in why this is untrue: that National Forest has been depleted of old growth (and much of the mature forest) yet the number of catastrophic fires actually increased after the logging. There are different reasons for this but one is that the older trees with thick bark were more fire resistant and could tolerate more frequent lower intensity fires. When the old trees were removed, the younger trees were more susceptible to stand-replacing events. In any event, studies have found that old growth stands are atmospheric carbon sinks, whereas logging is a major carbon source. The Final EIS should discuss these studies.

In conclusion, I ask the USFS to Amend the old growth Land Management Direction to:

- **protect all remaining old growth forests on the National Forests nationwide;**
- **protect all remaining mature forest habitat in SS-4B and SS-4C to become replacement old growth in the future and provide some old growth qualities in the near term;**
- **abandon the proposal to use National Forest vegetation for “energy production.”**

The Final EIS should rigorously explore and objectively evaluate an alternative based on these constraints. If this is done, I believe the Forest Service will conclude this is the best alternative for conserving the public forests and their resident species, and will also best meets the wishes of millions of Americans.

Thank you for considering my comments.

Sincerely,

D.J. Duerr