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Linda Walker, Director, Ecosystem Management Coordination
United States Forest Service
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Dear Ms. Walker:

Thank you for accepting these comments from the Society for the Protection of New Hampshire Forests (Forest Society) regarding the draft Environmental Impact Statement on the U.S. Forest Service's proposed national old growth amendment.

As you may know, the Forest Society is a nearly 125-year-old land trust and forestry non-profit organization whose mission is to perpetuate the forests of New Hampshire through their wise use and their complete reservation in places of special scenic beauty. The impetus for the formation of the organization was to protect the White Mountains, which at that time were rapidly being cleared. In reaction to those irresponsible forestry practices, the Forest Society led the lobbying effort in support of the Weeks Act. That effort resulted in the establishment of the White Mountain National Forest (WMNF).

Because of the multiple benefits that publicly and privately-owned forests provide to society, we continue to take an interest in ensuring the forest resources in the WMNF will always be managed with their long-term health and resiliency in mind. As an example of this commitment, the Forest Society was actively engaged in the development of the current management plan for the WMNF when it was approved in 2006.

This historical connection to the WMNF drives our interest in the agency's proposed rule. It is our understanding the overarching purpose behind the agency's proposed national old growth amendment is to provide consistent direction to conserve and steward old-growth forest conditions, especially as the nation's forests face changing climate conditions. Under that main purpose, we further understand the agency intends to create a consistent framework to manage for the long-term protection and sustainability of old-growth forests across the National Forest System.

This goal is laudable given how deeply the public cherishes the aesthetic, spiritual, cultural and ecosystem benefits these places provide. It is also a challenging one to achieve. The Society of American Foresters made that point in the comments it submitted earlier this year in response to the Forest Service's Notice of Intent (NOI) to prepare an environmental impact statement. The SAF notes that there is no scientific consensus for a uniform management strategy for mature

and old-growth forests across the National Forest Service. The organization further notes that a “nationally consistent approach cannot come at the expense of local expertise that reflects the differences in forest ecology, management needs, and cultural perspectives present at the unit-level.”

That is an important point for the US Forest Service to take into consideration. For example, the current WMNF Management Plan contains definitions for Old Growth Forest, Old Growth Enriched Upland Forest Community and Old Forest Habitat that are specific to the conditions in the WMNF. The definitions of old growth used in the agency’s old growth inventory are not the same as the WMNF’s Forest Plan definition of old growth, which is what the WMNF staff currently use to identify old growth site-specifically. Moreover, the WMNF Plan explicitly states that timber harvests are prohibited in forest stands that meet the old growth characteristics described in the Plan.

As an example of this point, the definition of Old Growth Forest in WMNF plan is “*Uneven-aged (three or more age classes) forest with an abundance of trees at least 200 years old, multiple canopy layers, large diameter snags and down logs, and a forest floor exhibiting pit-and-mound topography. There should be little or no evidence of past timber harvest or agriculture. Northern hardwood old growth consists primarily of sugar maple and American beech; softwood old growth is largely made up of spruce and hemlock. Stands need to be at least 10 acres in size to be identified as old growth. Anything smaller is a patch of old trees within a younger stand, not a habitat.*”

Whereas, the definition of Old Forest in the Sequoia National Forest Management Plan is “*late successional stands in the montane and upper montane zones that are characterized by the presence of large and old trees (generally exceeding 30 to 40 inches in diameter and more than 150 years in age) and contain unique structural features, such as large snags, large logs, and variable tree size classes, that contribute to high structural complexity and heterogeneity. Structural complexity of old forests includes a mixture of individual trees, tree clusters, and canopy openings, with and without shrub or tree regeneration patches, which vary over space and time.*”

Those differences in definitions reflect the distinctions in forest types and conditions from one National Forest unit to another and the necessary differences in management approaches.

Further, as noted by SAF in its August 30, 2022 response to the Forest Service’s Request for Information on Federal Old-Growth and Mature Forests “the greatest threats to mature and old-growth forests are the compounding disturbances from climate change, wildfire, insects, disease, and drought. An attempt to define, inventory, and map mature and old growth forests presents an opportunity to facilitate science-driven policies that aim to balance conservation and climate-smart outcomes by directly addressing these documented threats.”

We appreciate the USFS's focus to find ways to better manage our country’s publicly owned forests. As the Forest Service takes steps to protect old growth forest stands, we would urge you to continue to undertake management activities that will result in diverse age-class forests across

the entire National Forest System. Such a focus will promote wildlife habitats, recreation, wood products, climate change mitigation and the other benefits society derives from our forests.

Ultimately, we would ask the Forest Service to ensure the land managers in the WMNF have the tools, resources and flexibility to ensure the forest stands in the White Mountains continue to be healthy, diverse and resilient for the long-term, based on the conditions and needs of the local forest resource. Thank you.

Sincerely,

A handwritten signature in blue ink, appearing to read "Matt Leahy", with a long horizontal flourish extending to the right.

Matt Leahy, Public Policy Director
Society for the Protection of NH Forests

