

I would like to submit the following comments regarding **Amendments to Land Management Plans to Address Old-Growth Forests Across the National Forest System: Draft Environmental Impact Statement** (DEIS) (U.S. Forest Service, June 2024) and its supporting documents. Thank you for this opportunity to provide input on the Forest Service's proposal to amend over 120 land management plans in response to President Biden's April 22, 2022 Executive Order (EO) 14072 *Strengthening the Nation's Forests, Communities, and Local Economies*.

### **The proposed amendment needs more focus on mature forest protection.**

Reading the DEIS, I was immediately struck by its lack of emphasis on conservation of mature forest areas, to allow their progression toward old-growth condition. This runs counter to the clear intent of EO 14072, which states in Section 1: "Conserving old-growth **and mature forests** on Federal lands while supporting and advancing climate-smart forestry and sustainable forest products is critical to protecting these and other ecosystem services provided by those forests." Section 2, paragraph 1 mandates that "to further conserve **mature** and old-growth forests and foster long-term United States forest health through climate-smart reforestation for the benefit of Americans today and for generations to come, the following actions shall be taken . . ." These actions include completion of "an inventory of old-growth **and mature** forests on Federal lands," analysis of "threats to **mature** and old-growth forest on Federal lands," and "conservation strategies that address threats to **mature** and old-growth forests on Federal lands. In fact, throughout the section related to national forests, mature and old-growth forests are always mentioned in tandem. (*Emphasis mine.*)

The DEIS notes that "mature forests comprise approximately 47 percent of forested acres" on federal lands and that "the goal is not to manage all mature forest as future old-growth forest." It further states: "However, the amendment does place an emphasis on identifying and prioritizing areas of mature forest to be managed for future old-growth forest, particularly in the Modified Proposed Action (Alternative 2)," noting that specific direction is included "as part of the *Adaptive Strategy for Old-Growth Forest Conservation* (Management Approach 1.b) and in a guideline that applies to management of those areas (Guideline 3)" (DEIS, S-5). Management Approach 1.b, which aims to "identify areas that have the inherent capability to sustain future old-growth forest . . . over time and prioritize them for proactive stewardship," includes as one of its eight listed purposes "to recruit and promote the development of future old-growth forests where current conditions in mature forest are likely to achieve the old-growth forest definitions and associated criteria in the shortest timeframe possible" (DEIS, p. 23). Guideline 3 provides for "the recognition and retention of old trees that exist outside of old-growth forests that have cultural or historical value" (DEIS, p. 34). Even Guideline 1, which seems more relevant, merely states that "in areas that have been identified in the *Adaptive Strategy for Old-Growth Forest Conservation* as compatible with and prioritized for the development of future old-growth forest, vegetation management projects should be for the purpose of developing those conditions" (DEIS, p. 33). To me, these portions of the proposed amendment hardly constitute an "emphasis" on mature forest conservation. There's really nothing here to constrain the Forest Service from conducting timber harvests and other disruptive management activities on mature forest lands at their sole discretion.

Living in southern Indiana (Region 9) near Hoosier National Forest, I have special reasons for concern about mature forest management. As mentioned in the DEIS, “combined, the Southern and Eastern Regions contain only about five percent of the old-growth on NFS lands. Across regions, **the extent of old-growth ranges from approximately three percent of the forested area in the Eastern Region** to 27 percent of the forested area in the Pacific Northwest Region and 76 percent of the Alaska Region” (DEIS, p. 60). Also, according to the Indiana Department of Natural Resources, “of Indiana’s original 20 million acres of forest, **fewer than 2,000 acres of old-growth forests remain intact**” (Indiana Department of Natural Resources, “Old Growth Forests,” <https://www.in.gov/dnr/nature-preserves/old-growth-forests/>). (*Emphasis mine.*)

Unless more mature forest is allowed to progress toward old-growth condition, this situation will not improve. And the only tracts in Indiana where this can happen on a truly significant scale lie within our state forests and Hoosier National Forest. It is *essential* that the Forest Service prioritize recruitment of future old-growth forest from mature forest, particularly here in the Eastern Region, allowing mature hardwood forest (approximately 80 years or older) on national forest lands to attain old-growth status. This would greatly expand the climate-mitigating impact of mature and old-growth forest in our region and be in keeping with the spirit and intent of EO 14072. As a further protection for old-growth forest, I also support **Alternative 3**, which would prohibit commercial timber harvest as a management tool for proactive stewardship in old-growth forests.

### **Use of prescribed fire regimes as part of proactive stewardship is inappropriate in eastern deciduous forests.**

Unlike many forests in the western part of the U.S., eastern deciduous forests, including Hoosier National Forest (HNF), are not highly vulnerable to burning. This difference is graphically illustrated by the 2022 United States Fire Risk Map (First Street Foundation, <https://www.usgs.gov/media/images/united-states-fire-risk-first-street-foundation>), which indicates that Indiana and other neighboring and eastern states are the least wildfire-prone in the nation. If anything, tree harvesting followed by repeated prescribed burns in eastern deciduous forests is apt to create drier conditions over time that will *increase* fire risk. The Forest Service should adhere to its Wildfire Crisis Strategy, which “calls for reducing wildfire risk through strategic all-lands, all-hands, science-based action that **focuses on the most at-risk landscapes**” (DEIS, p. 10). (*Emphasis mine.*) Clearly, eastern deciduous forests are not in this category.

I am especially concerned about two large-scale, multi-year projects the Forest Service has slated for Hoosier National Forest—Houston South and Buffalo Springs. In both cases, it plans to log in mature forest areas to create early successional habitat and to conduct prescribed burns for promotion of oak-hickory regeneration. I disagree with this approach, especially since ample early successional habitat could be recruited on privately owned lands within the HNF purchase boundary, leaving mature forest areas intact to progress toward old-growth condition. Also, oak-hickory is by far the dominant forest type in HNF and Indiana as a whole. While the Forest Service repeatedly touts oak-hickory’s importance for

wildlife, it fails to acknowledge that mixed mesophytic forest provides habitat for an equal abundance of native plant and animal species that thrive in a moister interior forest environment.

The DEIS also maintains that “structure and composition of old-growth forests in the eastern United States are threatened by mesophication, a process characterized by the transition of oak, hickory, and other frequent-fire deciduous forests to shade-tolerant, late successional species-dominated forests” (DEIS, p. 65). Has the Forest Service considered that this shift may prove to be a beneficial adaption of eastern forests to changing climate conditions, resulting in moisture-retaining older growth forest more resistant to hotter temperatures, drought, and fire? Also, as I mentioned in comments submitted November 20, 2023 concerning the Draft Supplemental Environmental Assessment for the Houston South Vegetation Management and Restoration Project Supplement:

Not so long ago, historically speaking, Indiana’s forests were considerably more diversified. The USDA publication *Indiana Forests, 2013* notes on page 13 that “the forest composition and size structure in Indiana . . . are dynamic and are a product of past disturbances. Sixty years ago forests in Indiana were dominated by oaks (Winters 1953), but the original land surveys prior to widespread European emigration indicated a **balanced mix of oak and beech-maple forest**” (*emphasis mine*) ([https://www.in.gov/dnr/forestry/files/fo-IN\\_Forests\\_2013.pdf](https://www.in.gov/dnr/forestry/files/fo-IN_Forests_2013.pdf)).

Beech-maple forest is clearly not some aberration or invasive encroachment to be eradicated. I have to wonder if the Forest Service’s emphasis on oak-hickory promotion has as much or more to do with timber value than with forest health and diversity or wildlife habitat needs.

**Suspend all Forest Service projects in mature and old-growth forest until Land and Resource Management Plans have been amended and adapted as needed to promote conservation of BOTH mature an old-growth forest.**

Most of our national forests’ Land and Resource Management Plans (LMPs) are overdue for revision, including the 2006 Plan for Hoosier National Forest based on the 1982 Planning Rule. I find it very inappropriate that the Forest Service wants to move ahead with two massive logging/prescribed burn/road-building projects in HNF, basing its management decisions on an outdated LMP created without public input.

*A Citizen’s Guide to National Forest Planning* notes that “the 2012 Planning Rule focuses on engaging with and listening to the public at all phases of the planning process. **Ensuring that the public is involved in the development (and not just the review) of plans is one of the ways forest planning has changed** ([https://www.fs.usda.gov/Internet/FSE\\_DOCUMENTS/fseprd520671.pdf](https://www.fs.usda.gov/Internet/FSE_DOCUMENTS/fseprd520671.pdf), p. 12, ¶12). (*Emphasis mine*). As I stated in my June 10, 2024 pre-decision objection to the Houston South Vegetation Management and Restoration Project Supplement: Final Supplemental Environmental Assessment (SEA), Draft Decision Notice (DN) and Finding of No Significant Impacts (FONSI): “The Forest Service’s lack of focus on

adhering to its own regulations means that citizens were denied the opportunity guaranteed under the 2012 Planning Rule to weigh in on revision of the HNF 2006 Forest Plan **before** HNF began its push to implement the massive Houston South and Buffalo Springs projects based on the outdated plan.”

The DEIS also notes an atypical circumstance for Region 9 relative to NOGA-FW-STD-01:

Currently in Region 9 there are no regional old-growth narrative definitions or criteria for units to tier to for field applications, and most units have either a narrative definition without quantitative criteria or a narrative definition and an age threshold. While the region is currently working with the Northern Research Station to develop operational definitions, they are not expected to be available until completion of the Adaptive Strategy for Old-Growth Forest Conservation (NOGA-FW-OB01). Therefore, most units in Region 9 will not have regional criteria by the time the proposed amendment is to go into effect. Region 9 LMPs acknowledge the importance of old-growth on ecological integrity by describing desired future conditions that strive for encompassing all ecosystem seral stages. Therefore, the desire to move in the direction of promoting representation of old-growth follows the intent of NOGA (DEIS, p. 101).

I did a search and found that the term “old-growth” appears in only three places in the Hoosier National Forest LMP, in the following contexts:

Natural succession is the dominant process within the Charles C. Deam Wilderness. In the future there will be extensive areas of old-growth vegetation. Some younger trees and openings occur as a result of natural processes. Timber harvesting is not appropriate in this area. (Chapter 3: Management Direction, 3-34)

Old-Growth Forest - The (usually) late successional stage of forest development; old growth forests are defined in many ways. (Glossary, A-12)

The major items of interest in the Pioneer Mothers' Memorial Forest are the trees in the 88-acre, old-growth timber area, a prehistoric Native American village site, and the memorial development. (Appendix H, H-8)

I do not think these cursory references in the Hoosier National Forest LMP amount to expression of “the desire to move in the direction of promoting representation of old-growth,” as maintained by the DEIS.

Because the MOG amendment has yet to be applied to national forest plans and because the majority of LMPs are outdated and not likely to be updated for some years, it is imperative that the Forest Service put a moratorium on big projects that involve mature and/or old-growth forest, like Houston South and Buffalo Springs in Hoosier National Forest, until the MOG

amendment has been added to LMPs and adapted as necessary to protect **both** mature and old-growth forest.

Thank you for your consideration of my comments.