



Greg Johnson, Unsplash.com

"Every species is a masterpiece, exquisitely adapted to the particular environment in which it has survived. Who are we to destroy or even diminish biodiversity?" E.O. Wilson, Biologist

September 20, 2024

Re: Comments on Draft Environmental Impact Statement for Land Management Plan Direction for Old-Growth Forest Conditions Across the National Forest System #65356

Thank you for the opportunity to comment on the Draft Environmental Impact Statement (DEIS) for the proposed nationwide amendment to conserve old-growth forests across the National Forest System. While I appreciate the Forest Service's efforts to address this critical issue, we have several concerns about the current proposal:

Lack of Clear Old-Growth Definitions and Mapping

The DEIS fails to provide a clear, consistent definition of old-growth forests or require accurate mapping of existing old-growth stands. Without precise identification of old-growth areas, it will be impossible to effectively implement protections or measure progress. I urge the Forest Service to:

- 1. Develop scientifically-based, regionally-appropriate definitions of old-growth forests.
- 2. Require comprehensive mapping and inventory of existing old-growth stands on each national forest within 1 year of the final decision.
- 3. Make all old-growth inventory data and maps publicly available.

Inadequate Protections for Existing Old-Growth

None of the proposed alternatives provide adequate safeguards for existing old-growth forests. I recommend:

- 1. Prohibiting commercial logging and other extractive activities in all identified old-growth stands.
- 2. Establishing buffer zones around old-growth areas to protect them from edge effects.
- 3. Implementing strict limitations on road construction near old-growth.

Lack of Standards for Mature Forests

The DEIS fails to establish clear protections or management standards for mature forests, which are critical for future old-growth recruitment. I urge the Forest Service to:

- 1. Develop science-based definitions and criteria for mature forests.
- 2. Establish specific protections and management guidelines for mature forest stands.
- 3. Set targets for increasing the total acreage of mature forests over time.

Concerns with "Proactive Stewardship" Approach

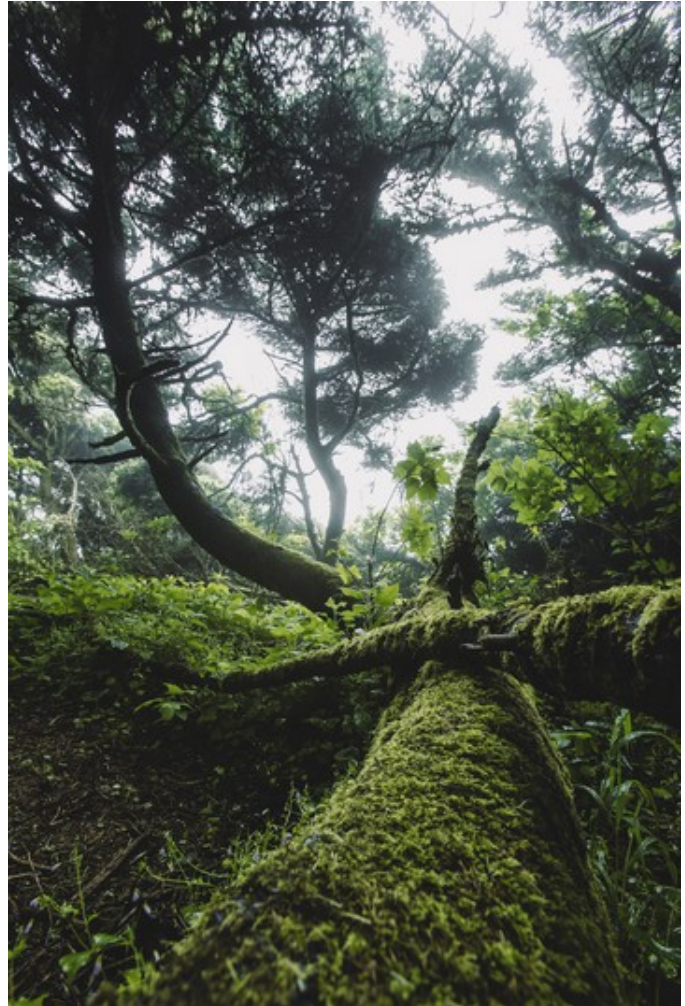
The preferred Alternative 2 relies heavily on a vague concept of "proactive stewardship" that could potentially allow continued logging in old-growth areas. I recommend:

- 1. Clearly defining allowable management activities in old-growth forests, with a strong emphasis on hands-off approaches except where active restoration is scientifically justified.
- 2. Establishing an independent scientific review process for any proposed management activities in old-growth stands.

Implementation and Funding Concerns

The proposed two-year timeline for developing Adaptive Strategies seems unrealistic given current staffing and budget constraints. I urge the Forest Service to:

- 1. Extend the implementation timeline to allow for thorough, science-based planning.
- 2. Seek additional funding from Congress specifically dedicated to old-growth conservation efforts.
- 3. Prioritize completion of accurate old-growth inventories before implementing other aspects of the plan.



Climate Change Considerations

Given the critical role of old-growth forests in carbon sequestration and climate resilience, I recommend:



- 1. Incorporating the latest climate science into old-growth management strategies.
- 2. Prioritizing protection and restoration of climate refugia and corridors for species migration.
- 3. Setting specific targets for carbon storage in old-growth forests.

Regional Approach and Biodiversity Enhancement

While I appreciate the Forest Service's efforts to address old-growth forest management within National Forest boundaries, I believe a more comprehensive, regional approach is necessary to truly protect and enhance biodiversity. I urge the Forest Service to consider the following:

- 1. Ecosystem-wide Management: Forest ecosystems do not stop at administrative boundaries. The DEIS should explicitly require consideration of land uses and management practices on adjacent private, state, and other federal lands when developing old-growth and mature forest management strategies.
- 2. Collaboration with Other Landowners: Establish formal mechanisms for collaboration with private timber companies, state forest agencies, and other federal land management agencies (e.g., Bureau of Land Management) to create cohesive, landscape-scale management plans that prioritize biodiversity conservation.
- 3. Biodiversity Impact Assessments: Require comprehensive biodiversity impact assessments that consider the cumulative effects of management decisions across all land ownerships within a given ecosystem or watershed.
- 4. No-Logging Zones: Consider establishing no-logging zones on National Forest lands adjacent to heavily logged private or state lands to provide critical habitat refugia and maintain biodiversity at a landscape scale.
- 5. Incentives for Private Land Conservation: Work with other federal agencies and Congress to develop incentives for private landowners to manage their forests in ways that complement and enhance biodiversity conservation efforts on National Forest lands.
- 6. Connectivity and Corridors: Prioritize the protection and restoration of forest corridors that connect old-growth and mature forest patches across different land ownerships to facilitate species movement and genetic exchange.
- 7. Adaptive Management Across Boundaries: Develop adaptive management strategies that account for changing conditions and management practices on adjacent lands, allowing for flexible responses to maintain biodiversity at a regional scale.
- 8. Research and Monitoring: Establish a robust research and monitoring program that tracks biodiversity trends across land ownership boundaries, informing management decisions on National Forest lands.
- 9. Public Education and Engagement: Develop outreach programs to educate private landowners and the public about the importance of managing forests for biodiversity at a landscape scale, fostering a shared sense of responsibility for forest ecosystem health.
- 10. Policy Recommendations: Include recommendations for policy changes or new legislation that would facilitate better coordination between public and private forest management for biodiversity conservation.

By adopting this regional, cross-boundary approach, the Forest Service can more effectively contribute to the protection and enhancement of biodiversity across entire forest ecosystems. This may indeed result in scenarios where no logging occurs on National Forest lands in certain regions to offset intensive management on adjacent private lands, ensuring the overall health and resilience of forest ecosystems and the species they support.

In conclusion, while I support the overall goal of conserving old-growth forests, the current DEIS falls short in providing the clear, science-based direction needed to ensure effective protection of these irreplaceable ecosystems. Therefore, I urge the Forest Service to address these concerns in the final Environmental Impact Statement and Record of Decision.

Respectfully,



Albert J. LePage, M. Ed. Science, B.S. Biology
Member, *Society for Conservation Biology*