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Here are my brief comments on the draft EIS for the mature forest and old growth amendment. The hubris that the Forest Service can somehow make and maintain old growth is astounding. Those forests developed historically without silvicultural practices and have been largely eliminated by those practices. The proposal is further fatally flawed for the reasons I list below:

- Many national forest plans, including the extant plans on the Nez Perce National Forest and Clearwater National Forest—forest plans with which I am very familiar—have protections far better than what is proposed under any alternative for old growth in the DEIS. Appendix N for the Nez Perce National Forest Plan (see also page II-19) and Appendix H (see also page II-23) for the Clearwater National Forest Plan. Both plans have percentage standards for old growth across the two Forests and in specific watersheds, stand sizes in terms of acreage in each watershed, and a general prohibition on manipulation in designated old growth stands. These are measurable criteria even if the agency has failed in its duties to complete the inventory of old growth. Yet, the DEIS behaves as if these two forests do not have criteria for maintaining mature forests and old growth.
- Neither of the two Forests have an updated inventory of mature or old growth forests. The FIA process cannot be a surrogate for old growth because of requirements for stand sizes and other factors (e.g. decay or down woody material). FIA plots are much smaller than requirements for old growth stands. Further, the seat-of-the-pants maps and charts in the DEIS are far too coarse scale to be meaningful on any scale at the Forest level.
- The DEIS proposed action would actually weaken protection for old growth on the two Forests by allowing logging, thinning, and so-called prescribed burning (human ignited) in them. Even Forest Service researchers like Evelyn Bull have found that manipulating old growth stands reduces bird species that depend on old growth. The science is clear, old growth forests are a function of lack of human disturbance and can't be improved or maintained by thinning, so-called prescribed burning, or logging.
- The DEIS does not include an alternative that would protect old growth or mature forests from agency meddling. Again, the best available science shows that old growth can't be maintained or enhanced by logging, thinning, or so-called prescribed burning.

In sum, the DEIS is a farce, promising protection of old growth by increasing exceptions to protection of old growth from timber management. The agency needs to be honest about what it is proposing-- putting old growth under timber management, which means the eventual elimination of old growth except in Wilderness. The DEIS should be dumped and a new one put out for public comment. That DSEIS should incorporate the following ideas into a new proposed action.

There should be no exceptions to old growth and mature forest protections (no logging, thinning, or prescribed burning) from agency meddling anywhere. For example, the final draft forest plan (not yet

approved, still in the objection review process) for the Nez Perce and Clearwater National Forests would offer virtually no protection for old growth, a reversal of existing direction. Further, it would target old growth with a major grand fir component for logging. Grand fir, a softer wood, provides excellent snag habitat for woodpeckers, cavity nesters, fisher, and marten—species dependent on old growth. This potential direction needs to be reversed and the current direction strengthened.

Longterm goals should be established for percentages of old growth and mature forests. This may vary between 30 and 70 percent or more, depending on forest types. It is doubtful any national forests, outside of Alaska, are anywhere close to historic amounts of old growth and mature forests.

Sincerely,

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