

Data Submitted (UTC 11): 2/2/2024 5:00:00 AM

First name: Adam

Last name: Rissien

Organization: Wildearth Guardians

Title: ReWilding Manager

Comments: Dear Director Walker, On behalf of WildEarth Guardians and the more than 8,800 undersigned supporters, please accept these comments regarding the Forest Service's nationwide proposal to amend land management plans (i.e. Forest Plans) for each national forest across the country in order to protect existing old growth forests and ensure mature forests can develop into these unique ecosystems. The agency explains that the [ldquo]intent is to foster the long-term resilience of old growth forest conditions and their contributions to ecological integrity across the National Forest System.[rdquo] 88 FR 88042. Sadly, the proposed action fails to fulfill this intent and, absent significant changes, may even weaken existing protections for mature and old growth ecosystems. Even though the policy implies the agency may adopt a ban on old growth logging, the proposed action falls far short of actually ending the commercial exploitation of old growth forests. For example, the proposed action includes a standard (the most enforceable provision in forest plans), that reads as follows: [ldquo]Vegetation management within old growth forest conditions may not be for the primary purpose of growing, tending, harvesting, or regeneration of trees for economic reasons.[rdquo] 88 FR 88047. Qualifying the standard with the term [ldquo]primary[rdquo] undermines any protections the plan amendment may provide, and causes us to question the Forest Service's commitment to reigning in its timber sale program as it pertains to old growth logging. In fact, the agency provides a long list of exceptions that will allow the Forest Service to continue its business as usual, especially since the proposed standards allow for [ldquo]ecologically appropriate harvest[rdquo] that are [ldquo]proactive stewardship activities,[rdquo] which include the [ldquo]return of appropriate fire disturbance regimes and conditions.[rdquo] Id. In other words, the agency will be able to log old growth forests in order to artificially replicate fire disturbance conditions, which the Forest Service often provides as a rationale for its logging projects, including clearcutting. In fact, we often see Forest Service officials claim logging will mimic natural disturbances, but there are major differences between natural events and logging projects. Notwithstanding all the harmful ecological consequences that result from logging itself, and the associated impacts such as road construction, chainsaws cannot replicate the actual benefits natural disturbances provide as one scientific article explains: [ldquo]Natural forests (i.e., those protected and largely free from human management) tend to develop greater complexity, carbon storage, and tree diversity over time than forests that are actively managed; and natural forests often become less susceptible to future insect attacks and fire following these disturbances. Natural forest stewardship is therefore a critical and cost effective strategy in forest climate adaptation.[rdquo] Faison et al., 2023. At a minimum, we urge the Forest Service to adopt a plan amendment that better protect existing old growth forests and sets clear objectives for expanding old growth ecosystems that will, at a minimum, support fish and wildlife species that depend on those conditions to thrive. Such an amendment would direct each forest to identify old growth dependent species of conservation concern, and to monitor the population trends for each species to ensure their long term viability. More generally, it is crucial for the Forest Service to revise the proposed action in a manner that meaningfully addresses the severe loss of biodiversity and the worsening impacts of the climate crisis. Toward this end, we urge the agency to analyze and adopt an alternative with significantly strengthened old growth protections. As written, the amendment includes numerous unacceptable allowances for commercial logging of old-growth. The Forest Service should, with very limited exceptions, end all felling of old-growth trees everywhere and cutting of any trees in old-growth stands where fire is infrequent. In old growth stands that evolved with frequent wildfire, the plan amendment must limit any cutting or removal to immature, small-diameter trees with the specific purpose of creating conditions that allow for future disturbance events (wildfire, insect, or disease) so they may safely serve their natural ecological role. Such limited tree cutting or removal may also facilitate the return of traditional cultural burning practices. Further, in all events, the amendment language must be strengthened to completely eliminate the commercial exchange of old-growth trees. Any financial incentive to log these trees will undermine the goals of the amendment and the desired climate and conservation outcomes of EO 14072. We also urge the agency to include amendment language that requires definitions to be fully inclusive of all old growth conditions. The current

direction allows for regional variations that artificially limit the amount of old-growth forests that would ultimately be protected by the proposed action. And, consistent with the recognition in the notice of the importance of expanding the distribution and abundance of old growth forests, we encourage you to consider and adopt a preferred alternative that ensures mature forests can develop into tomorrow's old growth ecosystems. We need transformational change, not the status quo or incremental steps towards nebulous future outcomes. Done properly, this Nationwide Forest Plan amendment could have a meaningful, near-term impact on confronting the climate crisis and on addressing the loss of biodiversity if the Forest Service changes course and truly achieves the amendment's intent.

ATTACHMENT: WildEarth Guardians Supporter Comments.pdf - Comments copy/pasted to textbox; coded/completed.