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Comments: The Forest Stewards Guild supports the USDA Forest Service's effort to ensure that old-growth forests survive and flourish. We provide the following comments in response to the agency's notice of intent to prepare an environmental impact statement to analyze the nationwide forest plan amendment to conserve old-growth forests.

The Guild is happy to see the Forest Service taking steps to maintain the existing areas of old-growth forests, and to foster the recruitment of future old-growth. Because of the small areas of existing old-growth forests and the threats they face, the proposed amendment should reflect the agency's clear intent to recruit additional old-growth forests to increase their abundance and distribution, and to provide that direction in the form of concise plan components.

As part of the effort to expand the abundance of old-growth, we recommend the agency establish an approach to identify the appropriate levels of old-growth forest abundance needed to sustain their ecosystem services and ecological integrity. Although the agency is not currently proposing a policy for the management of mature forests, the proposed amendment must provide clear direction for the recruitment of future old-growth and to identify specific areas of mature forest as recruitment opportunities and priorities. We are eager to help work through the ecological questions involved, though we recognize recruitment is largely a social / political question.

We are concerned about some of the exceptions to the proposed standards where they are too broad and lack accountability. For example, the exceptions proposed in Standard 2(b), such as 2(b)(ii) "to protect public health and safety," are too open-ended and too subjective. Of course, there is a legitimate need to protect public health and safety, but we recommend that the Forest Service better define what constitutes a public health and safety threat or risk. Standard 3 states that "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. Unfortunately, the qualifier "primary purpose" allows for economics to affect decision making around vegetation management within old-growth forests. Therefore, we suggest that the Forest Service eliminate the word "primary" from proposed Standard 3.

We applaud the inclusion of place-based reciprocal stewardship and the integration of Indigenous Knowledge in the proposed amendment. Similarly, we are enthusiastic about the collaborative development of Adaptive Strategies for Old-Growth Forest Conservation that seek to downscale conservation objectives to place-based reciprocal stewardship. We support this approach because it recognizes not only the role of Indigenous stewardship of old-growth forests, but also because it allows for restoration that addresses localized ecological conditions and needs. We are happy to share our experience building zones of agreement and collaboratively implementing restoration.

Based on our work in the fire-adapted forests of the Southwest, we believe that the proposed amendment is complementary and consistent with the Wildfire Crisis Strategy. Active management may be required to protect old-growth forests from uncharacteristic wildfires, invasive species, and other anthropogenic stressors. In fact, the proposed amendment may facilitate an increase in the pace and scale of treatment if it helps to codify the zone of agreement around maintenance and recruitment of old-growth forests.

Thank you for the opportunity to provide comments on the proposed national old-growth forest plan amendment. We look forward to working with you to conserve and restore mature and old-growth forests and ecological integrity across the National Forest System. Please let me know how we can help.

Sincerely,

Attachment: Guild_NOI_comment.pdf - is letter text above.