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Comments: J Schoen Comment on National Old-growth Amendment

This letter represents my personal comment on the "National Old-growth Amendment." I began my career as an Alaska wildlife ecologist in 1976 and have spent much of my professional work conducting wildlife research and developing conservation strategies for the Tongass National Forest. I received my Ph.D. in Wildlife Ecology from the College of Forest Resources at the University of Washington. I worked for the Alaska Department of Fish & Game, Division of Wildlife Conservation, from September 1976 through December 1996. I served as a wildlife research biologist in Juneau, regional research coordinator in Fairbanks, and statewide senior conservation biologist in Anchorage. Following my retirement from ADF&G, I served as executive director and senior scientist for Audubon Alaska from 1997- 2011. I have also served as an affiliate professor of wildlife biology at UAF. My research includes ecological studies of brown bear, black-tailed deer, and mountain goats and their relationships to forest management on the Tongass National Forest. My work with Audubon included conducting (in collaboration with the Nature Conservancy) a comprehensive conservation assessment and conservation strategy for the Tongass National Forest. I also served for a number of years on the Tongass Futures Roundtable. I am a Fellow of The Wildlife Society and previously served as president of the Alaska Chapter of TWS. I have published over 60 scientific papers, technical reports, and popular articles on Alaska wildlife ecology and conservation. I recently published *Tongass Odyssey: Seeing the Forest Ecosystem through the Politics of Trees* (University of Alaska Press 2020) and was co-editor and contributing author (with Gordon Orians) of *North Pacific Temperate Rainforests: Ecology & Conservation* (University of Washington Press 2013).

I strongly support the "National Old-Growth Amendment" to "conserve and steward old-growth forest conditions and recruit future old-growth conditions in light of increasing threats due to rapidly changing climate conditions." However, I am concerned that the "Southeast Alaska Sustainability Strategy" might allow commercial clear-cutting of additional old-growth forest lands on the Tongass. Based on my long-term research and conservation work on the Tongass, I support ending old-growth clear-cutting at once as proposed in alternatives 2 and 3. A small-scale, selective harvest (no clear-cutting) of individual trees for indigenous, cultural uses as described in the Southeast Alaska Sustainability Strategy, could be acceptable but nothing in the range of a five million board foot annual harvest.

There are two key issues I believe that should be explicitly considered in this National Old-growth Amendment as it applies to the Tongass National Forest.

First, the Tongass National Forest is likely the only forest jurisdiction in the world where we still have the unprecedented opportunity to conserve a largely intact temperate rainforest ecosystem that still contains all its ecological parts, including large old-growth trees, productive runs of five species of Pacific salmon, two species of bears, wolves, bald eagles, marbled murrelets, northern goshawks, and many other fish and wildlife species including a number of endemic species and subspecies. It is critical to recognize the unique opportunity we have for conserving the biodiversity of this natural forest ecosystem for the many ecological services and sustainable economic values, including carbon storage, that it provides.

Second, it is important to recognize that all old growth is not the same and that some specific forest communities on the Tongass are at serious risk of being reduced to the point that the forest ecosystem loses its natural diversity. I have excerpted below several sections from my recent book, *Tongass Odyssey*, to clarify the issue of high-grading the rare large-tree old-growth forest and also to highlight scientific concerns for conservation of this globally important temperate rainforest ecosystem.

In our 2013 Conservation Biology paper (Use of Historical Logging Patterns to Identify Disproportionately Logged Ecosystems within Temperate Rainforests of Southeast Alaska), Dave Albert and I retrospectively reviewed past logging patterns to document how logging has changed the structure of the rainforest, at the landscape scale, throughout Southeast. Although we had addressed this issue in our Conservation Assessment and Resource Synthesis for the Coastal Forests & Mountains Ecoregion in Southeast Alaska & the Tongass Forest (Audubon-TNC 2007), there was still an unwillingness by some timber managers to acknowledge that high-grading was a significant issue on the Tongass. In this peer-reviewed paper, we clearly demonstrated the extent of ecological changes that have occurred throughout Southeast and the Tongass. The abstract from that paper follows.

"The forests of southeastern Alaska remain largely intact and contain a substantial proportion of the Earth's remaining old-growth temperate rainforest. Nonetheless, industrial-scale logging has occurred since the 1950s within a relatively narrow range of forest types that has never been quantified at a regional scale. We analyzed historical patterns of logging from 1954 through 2004 and compared the relative rates of change among forest types, landform associations, and biogeographic provinces. We found a consistent pattern of disproportionate logging at multiple scales, including large-tree stands and landscapes with contiguous productive old-growth forests. The biggest rates of change were among landform associations and biogeographic provinces that originally contained the largest concentrations of productive old growth. Although only 11.9% of productive old-growth forests have been logged region wide, large-tree stands have been reduced by at least 28.1%, karst forests by 37% and landscapes with the highest volume of contiguous old growth by 66.5%. Within some island biogeographic provinces, loss of rare forest types may place local viability of species dependent on old growth at risk of extirpation. Examination of historical patterns of change among ecological forest types can facilitate planning for conservation of biodiversity and sustainable use of forest resources."

One of the remarkable findings that came out of this study was the impact of high-grading on Prince of Wales Island. Northern Prince of Wales was historically the most productive timber producing region in all of Alaska. Based on our research, we determined that the amount of contiguous high-volume old-growth forest on northern Prince of Wales Island had been reduced by 93.8% from 1954 to 2004. Today, stands of large-tree old-growth have been significantly reduced in area, and the distance between these stands has been significantly increased compared to their original distribution. This habitat fragmentation will have a substantial impact on those species that rely on this old-growth forest habitat. We have already seen declines in deer populations where whole watersheds have been converted from old growth to second growth. Further, the population of the endemic Southeast Archipelago wolf, which preys largely on deer, has also declined. The significant change in ecological structure of the forest in this area will likely impact other species as well, including the Prince of Wales flying squirrel, Queen Charlotte goshawk, and others. Based on our previous conservation assessment, we estimated that about half of the original distribution of high-volume (large-tree) old growth has been lost region-wide in Southeast Alaska.

In the spring of 2014, I worked closely with a group of scientists to craft a letter to President Obama recommending a national policy prohibiting the logging of old growth on national forest lands. Remarkably, the Tongass is the only national forest where old-growth logging was still a standard management practice. On June 25, seventy-eight scientists from across North America-including former US Forest Service Chiefs, Jack Ward Thomas and Mike Dombeck-sent our letter to the President of the United States. Key excerpts follow.

"...we are seeking your support for a National Old-Growth Conservation Policy that would preserve existing old-growth forests within the United States. The remaining old-growth forests, from the redwoods of California, to the Douglas-fir forests of Washington, to the spruce-hemlock rainforests of southeast Alaska, provide the nation with many irreplaceable ecological benefits. These include clean water for millions of Americans, outdoor recreation, and key habitat for salmon and other important wildlife species. Because old-growth forests store vast quantities of carbon, protecting these remaining forests from logging could also play a role in reducing the effects of global

climate change...

"... The most important ecological characteristics of old growth take centuries to develop and, hence, are never achieved in managed forests with typical harvest rotations of 50-120 years...

Currently, only about 5-10% of the original old-growth forests that existed prior to European settlement remain in the United States (excluding Alaska's taiga) and most of that occurs in the Pacific Northwest and southeast Alaska... The largest extent of remaining old-growth forest is found in southeast Alaska. But even there, more than half of the largest trees have been logged, and pressure continues to cut the best of what's left. The diversity and productivity of forest communities, along with the myriad of ecosystem benefits that they provide to people, have been significantly reduced.

"We, the undersigned scientists, respectfully request that you direct the Secretary of Agriculture and Chief of the U.S. Forest Service to utilize their authority to craft a National Old Growth Conservation Policy that fully protects the remaining old-growth forests on national forests throughout the United States and also encourages the restoration of representative stands of mature forests where old growth has been depleted."

This letter was signed by many of the nation's eminent scientists from a broad range of academic institutions. It also included a number of former Forest Service scientists, some with specific expertise on the Tongass. As I communicated with many of these scientists, I heard a common refrain: "I can't believe the Forest Service is still clear-cutting old growth." Although our letter requested a national policy on old growth, we all recognized that the primary issue was to bring the Tongass into compliance with recent scientific understanding and modern management approaches.

Later that same year, we took another shot at seeking an administrative policy to end old-growth logging on the Tongass. Working closely with several colleagues, we drafted a joint letter from seven scientific societies to Secretary of Agriculture Tom Vilsack seeking a transition out of logging old growth on the Tongass. Attaining signatures on a letter from seven large organizations representing thousands of scientists is not a simple task. However, we did reach a consensus and a letter was sent to the Secretary on January 20, 2015 from the Alaska Chapter of the American Fisheries Society, American Ornithologists' Union, American Society of Mammalogists, Ecological Society of America, Pacific Seabird Group, Society for Conservation Biology, and The Wildlife Society. Excerpts from that letter follow.

"As the nation's premiere scientific societies engaged in studies of fish, wildlife, ecology, and conservation, we are writing to express our full support for an accelerated transition away from clear-cut logging of old-growth forests on the Tongass National Forest...

... Because it takes centuries for forests to develop fully, the ecological characteristics of old-growth habitats, once clear-cut, are essentially lost forever. The Tongass is the only national forest in the United States where clear-cut logging of old growth still occurs...

The Tongass National Forest has the greatest abundance of old growth remaining in the nation. Managing for its old-growth forests, carbon stores, and fish and wildlife populations, would provide an example to the world of the administration's commitment to climate change remediation as well as assure that the Tongass region will continue to provide robust natural resources for future generations. For these reasons, we request that you (1) provide additional guidance to the Forest Service to end clear-cut logging of old-growth forests during the forest plan amendment process, and (2) ensure that the timber industries' transition to second growth is completed as rapidly as possible, ideally within the next three years."

These seven scientific societies cumulatively represented a membership of over 30,000 North American scientists and natural resource managers.

My recommendation for this Amendment is to explicitly address the unique ecological role the Tongass plays globally and also address the importance of maintaining the natural diversity of all old-growth forest communities across the Tongass Forest (including the rare large-tree old-growth communities that provides valuable habitat for many fish and wildlife species).

Thank for your consideration of my recommendations. Aldo Leopold said that the first principle of conservation was to save all the parts. We still have that opportunity on the Tongass National Forest.

Sincerely,

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