Data Submitted (UTC 11): 9/15/2024 4:00:00 AM First name: John Last name: Quidachay Organization: Associated California Loggers Title: Forester Timber Specialist Comments: To: Director of Forest Management, USDA Forest Service

Please open the attached comments regarding the draft environmental impact statement on Old Growth.

September 16, 2024Submitting Comments: Land Management Plan direction Across the National ForestSystemSubject: Comments on Old Growth Draft Environmental AssessmentTo: Director of Ecosystem Management-Forest ManagementAssociated California Loggers (ACL) is a non-profit trade association with 500 members that employ over 5000 people whose livelihood depend on sustainably managed forests. In addition, ACL, relies on the support of heavy equipment and parts industry, employing fuel suppliers that Founded in 1973, ACL members have extensive, forestry and natural resource educations, experience, and generational knowledge of the forests of California. On behalf of ACL membership, we are pleased to submit comments on the Draft EnvironmentalImpact Statement protecting and sustaining our nation's old growth trees stands. ACL'scomments will be focused on the nations western forest in Arizona, California, Colorado, Idaho,New Mexico, Oregon, Washington and Utah. These states, while separated by geopolitical boundaries have similar forest biomes that should be analyzed differently, rather than a broadstroke that does not meet the needs of these forest systems, but rather should be separated todefine old growth more specifically based on a different set of criteria and active managementpolicy to prevent their loss. ACL believes there are a host of reasons these old growth tree standsneed to be sustained. Chief among and the number one reason to allow active management is therisk of loss from uncontrolled catastrophic fire, insects, rot diseases, and other atmosphericclimate changes. Put plain and simple, we need to actively manage these forests to allowintervention to protect and sustain their existence far into the future. It is no surprise that the decades of decisions over the past 40 years to drastically reduce forestmanagement activities have resulted in the loss of old growth trees to catastrophic mega forestfires. Designating hundreds of thousands of old growth tree stands for endangered and threatenedspecies such as the Northen Spotted Owl (NSO), Strix occidentalis caurina and the soon to belisted California Spotted Owl (CSO), Strix occidentalis occidentalis habitat since 1994 fromactive management on our public lands have left our national forests in a state of decline in ourwestern forests. The New Mexico Spotted Owl, Strix occidentalis lucida is also listed as athreatened and endangered owl which ranges into Arizona and Colorado. These forest biomes aresuffering the same fate. Decades of declining national forest's health translates to the suffering of the health of humans, in terms of the air we breathe, the water we drink, and the carbon emitted into our atmosphere vsthe carbon sequestered in our forests and the wood products derived from active forestmanagement. The Environmental Protection Agency estimated that carbon emissions fromwildfires in the United States increased by more than seven-fold between 2005 to 2018, from 20.5 million metric tons per year to 141.1 million metric tons per year.1 The Forest Service's

ffectiveness in achieving climate resilience and perpetuating mature old forests requiresimmediate action to increase the acres treated using active forest management practices. Mechanical Treatments and Prescribed BurningThe efficacy of mechanical treatments coupled with prescribed burning in the nation's forestshas been proven repeatedly. Most of the National Forest System (NFS) lands west of the 100thMeridian should focus their work on reducing stand densities in frequent fire return intervalforests, while creating age class diversity in forests adapted to less frequent fires. Malcolm Northand other researchers found that most fire prone Western forests have seen tree densities"increased by six to seven-fold while the average tree size was reduced by 50%." Thisprevalence of overstocked stands, North says, "suggest that treatments for restoring forestresilience may need to be much more intensive than the current focus on fuels reduction.2" Inother words, in fire adapted forests in the West (which occur preponderantly on the NFS), thechief strategy that should be employed is widespread

use of heavy thinning to reduce forest standdensities. Aerial and ground imagery shows wildfires burn less intensely in treated areas. In some cases the low density of ground and ladder fuels in thinned areas made them function as a fire break, with no burning happening in the thinned area.3 This also aided in the containment of wildfiresby firefighters. To reduce carbon emissions and increase sequestration the Forest Service should moveaggressively to active forest management activities aimed to protect old growth trees and reforestunreserved National Forest System lands that have been damaged or destroyed in catastrophicfires.ACL cites Title 16 -Conservation[sect] 1611. Timber (a) Limitations on removal; variations in allowable sale quantity; publicparticipation The Secretary of Agriculture shall limit the sale of timber from each national forestto a quantity equal to or less than a quantity which can be removed from such forest annually inperpetuity on a sustained-yield basis: Provided, That, in order to meet overall multiple-useobjectives, the Secretary may establish an allowable sale quantity for any decade which departsfrom the projected long-term average sale quantity that would otherwise be established: Providedfurther, That any such planned departure must be consistent with the multipleuse managementobjectives of the land management plan. Plans for variations in the allowable sale quantity mustbe made with public participation as required by section 1604(d) of this title. In addition, undersubsection (b) Salvage harvesting Nothing in subsection (a) of this section shall prohibit theSecretary from salvage or sanitation harvesting of timber stands within any decade, which are substantially damaged by fire, windthrow, or other catastrophe, or which are in imminent dangerfrom insect or disease attack.ACL recommends a serious look at the provisions in the National Forest Management Act(NFMA) and the subsequent amendments after enactment in 1976. The USFS has not been compliant. Over the past 40 years, the agency has shifted away from the spirit and purpose of thelaw. That is to manage our National Forest on a sustained yield for goods and services for the reater good, for the greatest number, over the long term in perpetuity. We urge you to considernot setting aside additional areas that limit sustainable forest actions aimed at keeping our forestheathy and communities that rely on forests for economic growth. The first sentence of Title 16is important to highlight. The departure from this has largely resulted in the destruction of millions of acres of the National Forest and therefore the loss of old growth. The loss of habitatis alarming. For example, in the Eldorado National Forest, the 2021 Caldor Fire resulted in theloss of thirty protected activity centers for the California spotted owl. Loss of owl habitat is acommon occurrence duplicated throughout California Region 5 forests over the past threedecades due to catastrophic mega forest fires. What is more alarming, the complete destruction of entire rural towns and communities resulted in the loss of life and property.ACL "You Have to Cut Trees to Save Trees"Solution: Analyze a coherent approach to the above question and theme, by overlaying themature old forest layer with the fireshed analysis then create a network of defensible fuel profilezones adjacent to mature old forest stands; assess stocking levels of existing mature forest standsand prioritize treatments to reduce stocking levels. The Forest Service found in the Mature andOld Growth Inventory4 that 13.4 million Acres of "Old Growth" on National Forest Systemlands was already in Congressionally designated Wilderness areas, more that 54 percent of thetotal old growth. Similarly, 25.6 million acres of "mature" forests were in these restricted landuse areas (38 percent of the total). Outside of these already restricted land areas, the ForestService should actively manage all mature and old growth forests to ensure that they remainresilient to current and future conditions. For some species, this includes using regenerationharvest to recreate desired forest types - such as Jack Pine, Aspen, and several different types ofhardwood species that do not regenerate without canopy removal. The literature establishing the effectiveness of management - particularly thinning in fire pronestands - is voluminous5. Just because the dominant trees in a stand are very old for a particularforest type does not mean that the correct management approach is to cease all management andtimber removal from that stand. Some forest types, like Lodgepole Pine, Jack Pine, Douglas Fir, and Aspen are adapted to significant disturbances that frequently result in mineral seed beds orroot suckering, which fosters regeneration. The most effective strategy to "maintain" olderforests of these types would be through periodic cutting to ensure age class diversity, withdifferent stands maturing at different times. In forest types that are adapted to more frequent fires, thinning should be used to maintainappropriate stand densities, followed by enough regeneration harvest to ensure age classdiversity over time. Just because the dominant trees in a stand have reached or are approaching the age classes identified in the regional definitions of old growth does not mean that the bestway to conserve that stand is to leave it choked with uncharacteristically high basal area, madeup in part by trees which do not contribute to overall resilience. Given that the Mature and Old Growth Inventory found thirty-nine million acres of mature andold growth forests

on National Forest System Wilderness, Roadless, and National Monumentareas strongly suggests that these types of ecosystems are already well distributed across thelandscape. In fact, when incorporating lands managed by the Department of the Interior's Bureauof Land Management, there are over 112 million acres of mature and old growth forest, over175,000 square miles. This is an area larger than all but three states, and is larger than the statesof West Virginia, Maryland, Vermont, New Hampshire, Massachusetts, New Jersey, Hawaii, Connecticut, Delaware, and Rhode Island combined. It is important to note that these impressive acreages of old growth and mature forests werefound based on a review of less than 20 percent of total forest area of the United States (notably, the review pointedly did not include any analysis of the millions of acres of forests found in theNational Park System, which is not open to commercial timber harvest). It is not clear at all thatCongress has established that the "challenge" before the Forest Service is to "maintain and growolder forest conditions while improving and expanding their distribution." The agency should incorporate conservation (not preservation, which has proven ineffective) of mature and oldgrowth Forests into existing forest plans, in concert with the other legally binding statutorymandates which remain in effect. Stand densities in set aside areas need to be reduced to protect the vegetation that provides the habitat for threatened or endangered species it relies on forsurvival. If we fail to do this, the consequences will eventually be catastrophic from a mega fireevent that destroys all species within a set-aside area. We should not allow this to occur.Not putting any additional mature or old growth forests on National Forest System lands into nomanagementstatus - Wilderness, Roadless, or National Monument - would be a good start. Asnoted, over 39 million acres of Mature and Old Growth is already located in unmanaged areas.Reserved forests in the Northwest and in California do not seem to be exhibiting "ecosystemresilience to climate change." Rather, they are experiencing high levels of forest mortality, largescale wildfires (with significant associated carbon emissions), and widespread conversion to nonforest. There is evidence that set-asides or reservation from management is not an effective" adaptation practice" for both "mature and old growth" forests and certain wildlife species. AsSteel et. al. has found6. "Recent disturbance trends in western forests create a test" of theassumptions behind a static approach to habitat conservation in disturbance-prone systems."Results from the Pacific Northwest suggest that in dynamic, disturbance-dependent forests, this assumption is not well supported[hellip]" and that "Under climate change, a static approach to matureforest conservation may be even less effective in drier and warmer regions such as the southernSierra Nevada."Steel et. al. also found that over the course of just one decade. "50% of moderate or high-densitymature forest habitat saw canopy cover decline below 40% constituting a transition to lowerdensity forest (22% of the original extent) or non-forest vegetation (28% of the original extent). Within the mature forest classification, higher density areas experienced more extensivedeclines, with 85% of this subclass falling below the 60% canopy cover definition of highdensity."7 We've witnessed significant mortality and forest loss in areas where set asides have been theprimary "conservation" strategy. Given this "strategy's" proven ineffectiveness, it would be would be to expand its use. The Northwest Forest Plan (NWFP) 25-year Monitoring Report onlate-successional and old-growth trends concluded that "wildfire remained the leading cause forolder forest losses on federal lands, accounting for about 70 percent of all losses since 1993.ACL urges you to review this important report. It cannot be dismissed, therefore must beconsidered.A study out of the University of California-Berkeley confirms that prescribed burning, the use of controlled fire to clear debris; restoration thinning, in which slow-growing or damaged treesare removed to make space for others; or a combination of both strategies effectively reduce the risk of catastrophic wildfire while also improving forest health, according to arelease. 8How might the Forest Service better support diversified forest economies to help make forestdependent communities more resilient to changing economic and ecological conditions?The best way for the Forest Service to incentivize economic development, diversification, andstrengthening communities is through a reliable and growing supply of wood fiber to meet theneeds of existing wood products facilities, but importantly the needs of the American People Aswe noted above, the National Forest System is not currently functioning this way: We've seenmultiple mill closures even during periods of record-breaking prices for commercial woodproducts.Congress has given the Forest Service unprecedented new authorities (Farm Bill CE's, permanent Stewardship Contracting Authority, expanded Good Neighbor Authority) and fundingstreams (Great American Outdoors Act funding for facilities, roads, and trails maintenance, permanent mandatory funding for land acquisition through the Land & amp; Water ConservationFund). The Infrastructure and Inflation Reduction Acts provided the Forest Service with roughly\$7 billion for fuels reduction, forest thinning, and the creation of fuel breaks. The Forest Service has between three

and five years remaining with those pots of availablefunding, and yet we have seen the agency select areas as "priority firesheds" that have little to noforest management capacity: The individual forests sometimes have few if any timber staff, withlimited experience in planning or administering timber sales. In many cases there are few (if any)outlets for wood fiber, and little to no logging or trucking capacity. Instead of allocatingresources to forests with fuels reduction needs AND management capacity, the Forest Servicehas instead opted to use other criteria and to allocate resources to regions with limited prospectsfor success. The Forest Service should direct all remaining funds from the remaining Infrastructure andInflation Reduction Act to Forests that have internal management capacity, capable externalpartners, and functioning wood supply chains, they will bolster the resilience of neighboringcommunities while generating revenue from commercial timber sales to extend non-commercial

work onto additional acres. There are considerable amounts of work to be done on the roadedland base of the National Forest System. The Associated California Loggers (boots on theground) and forest products industry want to partner with the Forest Service to accomplish thismuch needed work. We have made serious investments in technology and state-of-the-art lowimpactequipment. Let us work together to save our treasured National Forest Lands with asensible collaborative approach.ACL is recommending for the integration of actively managed, selective logging and fuelsmanagement practices in and around old-growth forests in alignment with the National ForestManagement Act. This action is imperative to address the multifaceted impacts stemming from the absence of natural fire cycles, reduced logging activities, closure of 75% of California millssince the 1980s, and the effects of climate change-induced drought on forest health. Thetransition away from active forest management has resulted in profound and lastingconsequences for both our forests and the rural communities reliant on them. The decrease inlogging activities and the absence of natural fire cycles have rendered our forests increasinglysusceptible to catastrophic wildfires, leading to extensive depletion of old-growth forest areasand significant loss of vital wildlife habitat. Furthermore, the cessation of mill operations hasdrastically impacted the rural communities that depend on the forest industry for their economiclivelihoods, leading to economic hardship and a shift towards tourism-based economies. This haseroded the resilience of these communities in the face of natural disasters like the Rim Fire, Caldor Fire, Dixie Fire, and King Fire, to mention a few. The Forest Service's planning and comment period after these fires results in no work being completed after these fires resulting ina massive economic loss as well as a forest that will never be close to being restored in ourgrandchildren's lifetime. It is of utmost importance to address these challenges through a holisticapproach that encompasses selective logging in and around old-growth forests. By adoptingscience-based, active forest management practices, we can mitigate the risk of catastrophicwildfires, enhance overall forest health, and support the long-term sustainability of rural communities dependent on the forest industry. I urge the agency to thoroughly consider thesignificance of integrating selective logging as part of the solution to the challenges faced by ourforests and rural communities. It is crucial to strike a balance that protects old-growth forests, while also fostering forest health and resilience. Our national forests are being hijacked by selfservingpoliticians and extreme activists. Stop this amendment from the outcome of applyingpolitical demagogue to forest management.Politically Driven Nationwide Old Growth Amendment Fails to Address Primary Threats to OldForests, Harms Efforts to Address Wildfire Crisis. To consider as the current administration's approach with this broad stroke approach to amend all 128 national forest plans is frankly andbad idea. Solution: ACL recommends the Forest Service should focus on implementing effective strategies that are guided by local Forest Plans and informed by science, public input, and onthe-ground conditions. In conclusion, ACL members represent a large segment of rural communities working class, loggers, woods workers, truckers, farmers, cattle ranchers, and variety of support industries. Our communities are at risk from large landscape catastrophic forest and wildland fires. We expect athorough revision of the DEIS that considers a "bottom-up strategy". In other words, acentralized forest management system with an analysis covering all 128 National Forest is arecipe for failure. Revisions or individual forest plan amendments covering small geographic

areas would allow detailed local involvement. This is the way forward to protecting and sustaining old growth trees. ACL looks forward to your consideration of our comments.Respectfully,Russ HawkinsPresident Associated California LoggersEric CarlesonExecutive Director, Associated California Loggers1 Inventory of U.S. Greenhouse Gas Emissions and Sinks 1990-2018 U.S. Environmental Protection Agency April20202 Operational Resilience in Western US Fire Prone Forests Malcolm P. North et. al Forest Ecology and ManagementVolume

507, 1 March 2022, 1200043 healthyforests. (n.d.). Logging and Thinning Helps Reduce Wildfire Risks - Healthy Forests, Healthy Communities.https://healthyforests.org/2021/07/logging-and-thinning-helps-reduce- wildfirerisks/4 Old-Growth and Mature Forest: Definition, Identification, and Initial Inventory on BLM and Forest Service LandsFulfilment of Executive Order 14072 Section 2(b); USDA Forest Service (2023)5 See, for instance: M.T. Stoddard, et. al.; Forest Management & amp; Ecology 493 (2021); Forest Service Rocky MountainResearch Station Bulletin No. 59, (2023); S.J.Prichard et. al Ecological Applications, vol. 30, no. 5 (2020); T.B. Jain et.al.; Forest Science, vol. 66, no. 2 (2020), among many, many others.6 Mega-disturbances cause rapid decline of mature conifer forest habitat in California Z.L. Steel, et. al.; EcologicalApplications December 20227 Davis, Raymond J. et al., Northwest Forest Plan[mdash]The First 25 Years (1994-2018): Status and Trends of NorthernSpotted Owl Habitats (2022). Pacific Northwest Research Station, General Technical Report PNW-GTR-1003.8https://www.bing.com/ck/a?!&&p=09f6b98d47077ca7JmltdHM9MTcwNjQwMDAwMCZpZ3VpZD 0xYjk2YzdkYy0wMG11LTY5NDItMDVmMS1kNmYwMDEzZDY4NDImaW5zaWQ9NTIwMg&ptn=3&ver =2&hsh=3&fclid=1b96c7dc-00b5-6942-05f1-

d6f0013d6842&psq=Berkeley+prescribed+burning+and+thinning+study.+&u=a1aHR0cHM6Ly9uZXdzL mJlcmtlbGV5LmVkdS8yMDIzLzEyLzEyL3R3ZW50eS15ZWFyLXN0dWR5LWNvbmZpcm1zLWNhbGImb3JuaWE tZm9yZXN0cy1hcmUtaGVhbHRoaWVyLXdoZW4tYnVybmVkLW9yLXRoaW5uZWQ&ntb=1ATTACHMENT: Comments to USFS DEIS Old Growth..pdf - this is the same content that is coded in text box, it was also included as an attachment