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National Old Growth Amendment - Public comment

The NOGA does not go far in protecting old growth forests. I could find no mechanism or requirement for any district to protect old growth. It appears districts will be given the option to designate stands as old growth and what management is done. This is concerning because some districts have clearly not prioritized protection of old growth in the past and are unlikely to voluntarily do so now.

There does not appear to be any review process (NEPA or otherwise) to ensure proactive management is appropriate. The aggressive push for proactive management is wrong. The rush to manage as fast as possible is counter to developing sound plans for management prior to putting boots on the ground. In reality, most old growth forests should just be left alone. Proactive management will likely involve thinning and the removal of dead wood as well as removal of species that are considered undesirable to meet silvicultural goals. Reductions in density and deadwood disrupt old growth function and reduce old growth dependent species. It causes soil drying and heating and shifts energy and food webs. In other words, it shifts an old growth forest that has developed over time to its current state to something else. The term proactive management is ambiguous and would allow just about any kind of treatment. For example, the USFS Wildfire Crisis Strategy will likely drive management objectives that override the protection of old growth with significant degradation to old growth and even its loss. The NOGA does not recognize that big old trees alone are not old growth. Saving big trees while managing the vegetation, deadwood and species composition around them turn them into museum stands rather than them as an old growth ecosystem. Damage to the viability of old growth dependent species that are threatened is commonplace and will not aid in protecting old growth species under this document.

Contrary to the NOGA, old growth forests that are already protected should remain so (wilderness, roadless areas etc.) and additional old growth and mature forests be added to others by designating them as old growth and then leaving them alone. Further, mature forests need protection to replace old growth that is lost naturally and in locations that support effective population sizes of old growth biota and connectivity. While this is suggested in the NOGA, there is no incentive or requirements to do so, and they are unlikely to be implemented.

Old growth forests buffer disturbance. In most, when they are altered by typical management actions (thinning, etc.), their ability to buffer disturbance declines. Rather than actively managing forests, passive management has many added values. It allows the forest to continue to support old growth specialists and biodiversity and ensures continuity of the ecosystem services such as water purification and retention. This buffering capacity can be

leveraged by placing appropriate old growth forests into climate refuges that concurrently sequester large amounts of carbon. Such refuges are touched on in the NOGA but presented as mere suggestions making their reality unlikely. Amazingly, the NOGA gives short shrift to the value of mature and old growth forests in carbon sequestration. Given the USA's international commitments to reduce forest degradation and to work to sequester more carbon, this is a huge disconnect by the USFS from federal directives. Indeed, proactive management will release carbon and reduce sequestration (e.g. Glasgow Forest Leaders Pledge, Paris Climate Agreement, etc.).

The NOGA does not work toward supporting these commitments in any way. Forests are still evolving and can evolve fairly rapidly to new stressors if we don't apply practices that counter evolution. Large scale disturbances create more rapid evolution (adaptation) compared to small disturbances. The scientific studies showing the role of natural disturbance promoting genetic adaptation in forests is ignored here. In sections on lodgepole pine, management is suggested to be required due to climate change, but it is recognized that management can't stop outbreaks, and evidence is accruing that surviving lodgepole are genetically different and may be more resistant to beetles and better adapted to new climatic conditions. As such, outbreaks may help forests adapt more rapidly. As described in this amendment, exceptions that allow cutting old growth for projects are not restrictive enough to protect old growth. Clearly, management in the Wildlife Urban Interface (WUI) makes sense. Unfortunately, WUI definitions are being wrongly altered and broadened to include remote areas with low or no human habitation (see Green Union Forest Plan, WY; Yaak region in Kootenai National Forest, MT). That is a problem that needs to be addressed, or the designation becomes meaningless as a tool to protect human communities and gives carte blanche permission to log in remote areas including old growth. Incidental take allowances as written do not encourage the development of creative approaches to avoid cutting old growth such as re-routing new trails or roads.

Proactive management encourages cuts that pay for themselves which will, in part, direct what is done rather than what should be done. Since a district will determine what management should be done without outside review this is an opening and incentive for commercial logging. See P. 127. "Agency funds will go further under Alternatives 2 and 4 and treat additional acres of old-growth with the sales of commercial products covering a portion of restoration costs or "goods for services". In Alternative 3 extractive actions would be less attractive and less incentivized because 'appropriated funds will be needed to treat acres". Dis-incentivizing extraction, in the case of old growth, should be a positive not a negative. The statement "could also be interpreted that stewardship relies on logging. It is understandable that many people, ecologists included, would be quite wary of the big push for proactive management in this amendment. Logging old growth to save it is a hard sell if protection of old growth is the goal. This incentivizes unnecessary and heavy-handed management and damaging entries into old growth become more likely. It is stated "However, NOGA-FW-STD-2 clearly stipulates that vegetation management in defined old-growth areas "may only be for the purpose of proactive stewardship" (emphasis added). This sole purpose of the standard limits the risk of commercial incentives influencing the decision-making process" but this is not convincing given the vagueness of 'proactive stewardship'.

This amendment implies that clearcuts, early seral stages (clearcuts), thinning can be done in old growth if not detrimental. Leaving the word "detrimental" open to subjective interpretation leaves old growth forest vulnerable to any practice of management, no matter how damaging its effects. Restoring non-old growth habitat in old growth habitat is contradictory and given how little old growth remains and how abundant early-seral forest are in most areas, this argument does not hold water.

The need for logging in old growth to support local economies and keep mills open is false. Old growth is a small portion of our overall forests and if current logging is so sustainable and restoration of degraded forests is so pressing as is often touted, then logging in these smaller remnants is not needed. If it is needed to keep a mill open, what happens when we run out of old growth to log? Then we are without both.

Finally, I believe much of the plan as described is not based on the scientific literature on old growth ecosystems since the only outside review was from agencies and NGOs. Why the avoidance of academic researchers?

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