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Organization: Washington Native Plant Society

Title:

Comments: September 18, 2024

Re: Amendments to Land Management Plans to Address Old-Growth Forests Across the National Forest System
Draft Environmental Impact Statement

Dear Director Walker,

The Washington Native Plant Society (WNPS) is a non-profit organization with 12 local chapters and 2,500 members statewide. For over 45 years, WNPS members have prioritized conservation of intact native plants and plant habitats for their intrinsic ecologic function and value. WNPS promotes native plant appreciation with a variety of educational and conservation activities that are open to the public. These activities include studying plants in their native habitats. Our botanizing activities often occur on national forest lands in Washington, including old-growth forests which are one of the greatest assemblages of native plants and ecosystems in our state.

Currently, the U.S. Forest Service (USFS) lacks a national policy that specifically governs management of old-growth forests and protects them from threats posed by wildfire, road-building and commercial logging. Local forest management plans provide limited protection of old-growth forests and those protections often are outdated, do not represent the best available science, and are inadequate in our changing climate. National forests in Washington state still are recovering from decades of unsustainable logging that resulted in a roaded and fragmented landscape and huge losses of mature and old-growth forests.

The Amendments to Land Management Plans to Address Old-Growth Forests Across the National Forest System Draft Environmental Impact Statement, aka the National Old-Growth Amendment (NOGA), is a step in the right direction in proposing important reforms to national forest management plans. Positive actions include:

- * affirming that conservation of our old-growth forests is a desired action for ecological integrity;
- * recognizing the contribution of old-growth forests for many ecosystem functions;
- * providing some protection for remaining old-growth forests from logging;
- * creating guidance that promotes collaborative, community-led approaches for conserving old-growth forests;

* elevating the role of Tribes and Indigenous Knowledge in forest management through co-stewardship agreements.

The draft NOGA needs to be strengthened to adequately protect existing old-growth forests and provide pathways to recruit new old-growth forests. It fails to address the alarming deficit of old-growth forests due to decades of intentional liquidation between 1950-1990. "At the turn of the twentieth century, over 70 percent of western forests were old-growth stands..." Today, only five percent of western forests are old-growth.

Further, the draft NOGA fails to address the need for ecosystem connectivity between existing old-growth forests. The Desired Conditions section should include language supporting the increase in the amount of old-growth forests from the current level.

The draft NOGA focuses on allowing "proactive stewardship" in all old-growth forests, including thinning, prescribed fire, and other vegetation management treatments. At the USFS Field Meeting on the Old Growth Amendment on July 10, 2024, however, Dr. Jerry Franklin spoke out during our visit to the old-growth forest and emphatically stated that "the best thing you can do is just leave it alone." A focus on proactive stewardship for all old-growth forests is inappropriate. Although management to reduce wildfire risk may be appropriate in some forest types, it is not beneficial in all forests, such as those on the west slope of the Cascades Mountains or the Olympic Peninsula. The NOGA should be revised to acknowledge that some old-growth forests should be passively managed.

The draft NOGA includes many exceptions to the proposed standards, including exceptions from the proactive stewardship requirement that could lead to loss of old-growth forests. While some exceptions, such as public safety, are warranted, others could result in vast areas of national forests being exempt from the NOGA. All old-growth forests should be reserved from logging, including post-fire salvage logging, to conserve wildlife habitat, genetic diversity and carbon storage.

The draft NOGA explicitly exempts mature forests from its requirements. Mature forests provide many of the ecological roles as fully functional old-growth. Over time, mature forests will recover depleted areas. Mature forests, besides being future old-growth forests, also can provide connectivity between existing old-growth stands to conserve plant and wildlife movement corridors, gene flow, nutrient cycling, and seed dispersal. Connectivity also facilitates shifts in the ranges of plants, animals, and natural communities in response to environmental and climate change. The NOGA should be revised to reserve some mature forests from logging and salvage to provide pathways for future old-growth forests and forest connectivity.

Thank you for the opportunity to advocate for stronger protections for mature and old-growth forests.

Sincerely,

President Conservation Chair

Washington Native Plant Society Washington Native Plant Society

ATTACHMENT: 09.18.2024_WNPS_Comment Letter_National Oldgrowth Forest Plan Amendment Draft EIS_EC Review.pdf - this is the same content that is coded in text box; it was also included as an attachment