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Comments: Please see the attached document for the Comments of the Maryland Ornithological Society regarding the Land Management Plan Direction for Old-Growth Forest Conditions Across the National Forest System #65356.

September 19, 2024

Submitted electronically at: <https://cara.fs2c.usda.gov/Public/CommentInput?Project=65356>

RE: Land Management Plan Direction for Old-Growth Forest Conditions Across the National Forest System #65356

Dear Forest Service:

The Maryland Ornithological Society (MOS) appreciates the opportunity to comment on the Land Management Plan Direction for Old Growth Forests, specifically the Draft Environmental Impact Statement (DEIS,) which was released in June 2024. Our members frequently visit such forests to enjoy the diverse bird life to be found there. We were heartened when we learned that the Forest Service and Bureau of Land Management (BLM) would inventory Old Growth Forest and Mature Growth Forest managed by the two agencies. That inventory found that the Forest Service and BLM held 32 million acres of Old Growth Forest, and 80 million acres of Mature Growth Forest. In other words, Old Growth Forest accounts for 18% and Mature Growth Forest for 45% of the lands held by the two agencies.

We had hoped that this inventory would lead to protection of Old Growth Forest from logging. But there are numerous loopholes that would still permit logging of Old Growth Forest.

Specifically, the DEIS recommends 'thinning' (a euphemism for logging) to reduce fire hazards. Numerous studies have shown that thinning can actually promote the risk of fire.<sup>1</sup> We urge that the utmost protection be extended to Old Growth Forest, and such trees should only be removed under the rarest circumstances, when no other alternative exists

In addition, we urge the Forest Service to include robust protections for Mature Forests since they will be the foundation for future Old Growth Forest. The recruitment of Mature Growth Forest to Old Growth Forest will help replace the huge areas of Old Growth Forest that have been lost to logging. We note that some 37% of Forest Service lands would still be eligible for logging if Old and Mature Growth are protected, which is still a vast acreage.

We also urge an end to all commercial, clearcutting of Old Growth Forest in the Tongass National Forest. It is incredible that such 'management' is even contemplated.

We are concerned the concept of "proactive stewardship" may be too broadly applied. Proactive stewardship includes fuel treatments such as prescribed fire and mechanical treatments. While this may be appropriate in dry forest such as in the Sierra Nevada, in wetter areas such a western Cascades, a passive, hand-off approach is more appropriate. Regardless, stewardship projects should not degrade old growth forest characteristics.

The long list of exceptions for old growth conservation is troubling. We urge that exceptions be curtailed. And we certainly oppose the cutting of old growth in order to implement other activities, such as recreation and trails.

Old and Mature Growth Forest forests sequester large amounts of carbon dioxide. On the other hand, when Old Growth is logged, it will release 40-65% of its sequestered carbon dioxide into the atmosphere. It takes 200 years for a second-growth forest to recover the amount of carbon dioxide stored in a 300-year-old Old Growth forest.<sup>2</sup>

They provide valuable wildlife habitat, recreational opportunities, and promote tourism. Old and Mature Growth Forests serve as refuges for declining wildlife and as banks of carbon storage. Climate change is an existential threat to our bird populations. National Audubon predicts that some 398 birds species will be vulnerable to extinction if global warming exceeds 1.5 degrees centigrade. In eastern forests, 69 species are vulnerable, while the number of vulnerable species in western forests stands at 73.3 These forests provide valuable nesting habitat for forest interior dwelling bird species (FIDS). Some 5% of western birds and 27% of eastern forest birds are in decline according to the 2022 State of the Birds report.<sup>4</sup>

MOS is an all-volunteer organization dedicated to study, enjoyment, and conservation of birds and their habitat. We were established in 1945, and now stand at 2000 members drawn from all walks of life. Our members travel far and wide to see birds, to include public lands throughout the United States.

In conclusion, we ask that the final document provide for a virtually total ban on logging of Old Growth Forest, and robust protections for Mature Growth Forest.

Sincerely,

<sup>1</sup> <https://johnmuirproject.org/wp-content/uploads/2024/04/JMP-fact-sheet-thinning-and-fire-28Feb24.pdf>

2 Carbon Sequestration and Storage, Old Growth Forest Ecology, 2024,  
<https://oldgrowthforestecology.org/ecological-values-of-old-growth-forests/ecological-processes-and-functions/carbon-sequestration-and-storage/>

3 Survival by Degrees: 389 Bird Species on the Brink, National Audubon Society,  
<https://www.audubon.org/climate/survivalbydegrees>

4 State of the Birds 2022, North American Bird Conservation Initiative,  
<https://www.stateofthebirds.org/2022/state-of-the-birds-at-a-glance/>

ATTACHMENT: MOS Old Growth Amendment USFWS September 2024.pdf - this is the same content that is coded in text box; it was also included as an attachment