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

Forest System #65356

Thank you for this opportunity to comment on the Land Management Plan Direction for Old-Growth Forest Conditions Across the National Forest System. Safe Alternatives for our Forest Environment (SAFE) and the Northcoast Environmental Center (NEC) request that all of our comments in this input be included in the forthcoming management plan.

President Biden's Executive Order 14072, prioritizes climate-informed strategies to enhance forest carbon, increase wildfire resilience, and mitigate climate impacts on federal lands.

Unfortunately the Forest Service proposed plan has fallen short of these goals, and does little to ensure lasting protection and health of our dwindling mature and old growth forests.

The Forest Service's stated plan is to amend all land management plans across the national forest

system in order to promote ecologically driven management, address threats to old-growth and mature forests, and to increase their dispersal, distribution and abundance. Additionally, it seeks to facilitate adaptive strategies, and monitor old-growth forest trends and distribution patterns. To Have any chance of success in achieving these goals there needs to be major changes to this proposal. Clear and strict guidelines need to be adopted within the policy on how to treat mature and old growth stands in order for it to be effective in protecting and enhancing existing old growth and mature trees and forests. The current vague parameters within the policy will not be effective in ensuring lasting benefits or the long-term health of mature and old-growth stands.

The Forest Service needs to start by developing unique parameters for defining mature and old growth forests specific to individual species traits and long-term health. The definition and identification of mature and old-growth will vary by species, and clear guidelines need to exist for making this determination. These parameters need to include preserving mature trees for species that have shorter overall life expectancies or smaller Diameter at Breast Height (DBH) at maturity. Unique management tactics need to be applied depending on the target species, while also ensuring the health of the biome the target species resides in. These parameters need to include standards for maintaining these species' health within their specific biome, and where applicable, utilizing tactics that promote their health across multiple biomes. Management tactics need to promote the recruitment of mature and old growth trees in order to establish long-term preservation, health, and expansion of mature and old-growth forests.

The Forest Service needs to stop prescribing chainsaw therapy as a primary or even common management tool. The Forest Service should adopt a Passive Management Strategy when dealing with old growth and mature trees and forest stands. It is important to recognize that most existing old growth and mature trees, like those in the Pacific Northwest, do not require active management. It's time for the Forest Service to practice restraint as a valuable management tool,

and require standards that adhere to Passive Management Strategies.

Clear standards must be adopted instead of being left to individual forest managers. These newly established guidelines must be consistent across the landscape to protect the last remaining mature and old growth forest so that they can begin to nurture a future abundance of mature and old growth trees. It is critical for the survival of our National Forests into the next century, that we protect, enhance, and expand these last remaining stands of old growth and mature forest to be conserved and managed to achieve the broader goal of increasing old-growth distribution and abundance.

Old-growth forests and mature trees are invaluable in terms of cultural and biodiversity values. These forests provide clean drinking water, support diverse plant and animal life, offer cultural resources for indigenous tribes, and contribute to recreational activities that promote overall well-being. They also play a crucial role in capturing and storing significant amounts of carbon. By conserving and recruiting old-growth forests, we can effectively mitigate some of the impacts of climate change and preserve these cornerstones of our wildlands.

By incorporating these changes, the U.S. Forest Service can ensure that this proposal not only protects existing old-growth forests but also promotes their expansion and resilience in the face of climate change. We insist that the Forest Service adopt these crucial improvements to make this policy as effective as possible in safeguarding our nation's forests for future generations.

Thank you for this opportunity to comment. We look forward to engaging throughout this process.

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FS-Old-Growth-Forest-Mgmt-Plan-Comments-9-18-2024.pdf - This is the same content that is coded in text box;
it was also included as an attachment