

Data Submitted (UTC 11): 9/20/2024 4:00:00 AM

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Comments: September 20, 2024

Thomas J. Vilsack, Secretary of Agriculture

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Linda Walker Director, Ecosystem Management Coordination

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

Dear Director Walker and Secretary Vilsack,

Thank you for taking my comments on the DEIS for the Land Management Plan Direction for Old Growth Forest. I am very concerned about the direction that this DEIS is leading Old Growth forest. I enjoy all of the benefits that mature and Old Growth forests and untouched wilderness offers. I am an ecologist who is also spiritually invested in natural, unspoiled ecosystems. I also know that native, unharmed and untrammelled ecosystems are inherently good and don't only deserve to be protected because humans have a need or desire for it. Nature, including Old Growth forests, the trees and other living and non-living parts, and the mature forests that are on their way to becoming Old Growth, deserve the right to exist inherently - they deserve and should have Rights of Nature.

The way that the DEIS is written does not allow for the proper and inclusive protection of remaining Old Growth forest ecosystems, nor for increasing the amount of Old Growth forests. The original executive order refers to mature forests as well, which should also be protected. The plan direction states that the intent of this amendment is to foster the long-term resilience of old-growth forests and their contributions to ecological integrity across the National Forest System. The intent is supposed to be to increase the amount of Old Growth forests. The DEIS does not functionally address the goal of increasing mature and Old Growth forest except partially in Alternative 3, which needs to be changed in order to affect protection in a comprehensive manner, reasonable timeframe and to truly address the spirit of the Executive Order. The strategies and activities proposed do not

increase or protect any more than what currently occurs. It maintains status quo in most places in the country. The main threat to the existence of Old Growth forests is still the removal of trees and damage to the forest ecosystems by logging activities, regardless of their purpose. Incidental removal of trees is going to do the opposite of protecting and increasing Old Growth. Also, take note that not all forests across the U.S. are threatened by fire, least of all the forests in the Northeast. Increased roads and activities in forests actually increase the threats of fire. To reduce roads and therefore access will reduce the threats of fire, since in many places, forest fire is human caused. Reducing logging will reduce roads and activities that result in human caused forest fire. Sustainable use of forest ecosystems occurred prior to colonization, as well as sustainable fire management, but due to vastly increased population and current methods of resource extraction, sustainable use does not occur now. Logging and all silvicultural treatments, activities in Old Growth and mature forests are unsustainable and if maintained, will continue to decrease the amount of Old Growth forests and the biodiversity and climate benefits that they provide.

Essentially, the United States has such a small remaining percentage of Old Growth forest that it is important for all still remaining be protected from any resource extraction and any activities that will impact negatively the amount and inherent, natural integrity, including natural processes. The Executive Order addressed the minimal amounts of mature forest also. My recommendation is that all mature forests over the age of 80 years and all old growth forests inclusive, and all old trees, be protected to allow them to recover and to exist in their inherent right, as well as affording all the ecosystem services that we all enjoy. The DEIS states that around 50 percent of forested acres are mature, but that is an irrelevant figure. The relevant figure to state is the percentage of historical pre-colonization forests that are now in a mature or old state. Additionally, that percentage is far less when looking at the entire landscape, including non-federal lands. Additionally, in order to address our biodiversity crisis in addition to the climate change crisis, it was determined at COP 15 of the United Nations Environment Programme in Montreal in December, 2022, that we need to put 30% of our land aside for nature, and 30% of our degraded ecosystems under protection by 2030. Putting mature and old growth forests into real protection for nature, not for extraction, will help move towards that goal.

The first purpose of the proposed action is in conflict with itself, internally contradictory, because to "maintain and develop Old Growth forests", mature and Old Growth forests must not be managed the way it is proposed. Expanding abundance and distribution requires including mature forests, which have been left out of all of the Alternatives. Continuing multiple use in them also will decrease the abundance and distribution of some of them, while degrading others with impacts from activities related to management for wildfire, insects and disease.

There is a very simple way to increase Old Growth forests, but the USFS is making a complicated plan that is ineffectual at best. Management of mature and Old Growth forests using heavy equipment and including logging and many of the "multiple uses" in the forests will not increase the abundance or distribution of Old Growth, or of biodiversity, or of carbon storage, the basis and impetus of this work. It will degrade and eliminate Old Growth and decrease biodiversity and carbon storage and sequestration.

Alternative 1, No Action, does not address the need to increase and protect Old Growth forests. Alternative 2 allows actions that will continue to decrease the amount of Old Growth forests and does not meet the need for increasing and protecting Old Growth or the ecosystem services it provides. It's difficult to understand why Alternative 4 was offered, since it will do the opposite of what this plan is supposed to address.

Alternative 3 is the closest option to protect Old Growth Forests. It needs modification in order to achieve the goals of protecting and increasing Old Growth forest and its distribution. There should be no commercial timber harvest in any mature forests contiguous to Old Growth, in order to protect and increase the amount. In no cases should timber from mature or Old Growth forests, or Old Growth trees, be sold nor should anyone including the USFS derive any economic benefit from harvest or incidental removal. All old trees should be un-logged, un-harvested, and should remain in their location, no matter the stand age or forest type. The old trees should be left standing, as well as preserving a buffer of the existing trees surrounding them, regardless of their age, to protect the old tree from the increased vulnerability to wind and water damage that didn't exist before the logging around them.

The statement that some native species require non-Old Growth conditions is very misleading in this document, and doesn't belong here. Old Growth forests include characteristics mentioned: early seral stages, small forest openings, bare ground, frequent disturbance. They already exist in the amounts, sizes and frequencies that are appropriate to natural conditions and natural processes of the Old Growth forests of each particular region. There is no management necessary to create them since they are inherent parts of Old Growth forests. The management of the USFS to date has created these conditions in an unnatural size, frequency and scale, resulting in species in places other than where they have occurred naturally, and at levels that they didn't occur naturally, resulting in the biodiversity crisis now at hand. Management has been for only particular uses, wildlife and vascular plants with economic potential. A great number of Old Growth forest species and interior forest species are rare, threatened and endangered, or extinct. The USFS is not addressing in this DEIS many old growth and mature forest species of insects, arthropods, lichens, fungi, bryophytes, herbaceous, mollusks, reptiles, amphibians, etc. There is no need for management to create habitat aside from protecting and increasing interior, mature, and Old Growth forests. Allowing mature forests to age into Old Growth will increase the native species that utilize natural openings at the scale they need. Rare, threatened and endangered species of Old Growth and interior forests will benefit from the increase in size and abundance of mature and old forest, rather than being managed out of existence with the typical silvicultural treatments that logging provides. The percentage of National forest that is mature should be looked at as a percentage of all land in our nation, not just a percentage of publically held "National Forest" lands, so that a more realistic amount of land be restored to its original condition. In the Northeast, allowing all the mature forest to continue into Old Growth conditions would still be far less than the original amount of Old Growth forest that existed prior to deforestation. At most, continue to use existing National Forest land in early seral stages to maintain that age class. Prohibit the creation of early Successional habitat from mature or Old Growth stands.

The language in the DEIS on ecosystem services as related to the alternatives incorrectly lists cultural uses, recreation, mineral and energy resources and research as ecosystem services. It also incorrectly states that alternative 3 may be less beneficial for provision of ecosystem services. In fact, Alternative 3, especially if improved with these suggestions, would provide the most of all the alternatives, in providing a carbon sink, higher levels of biodiversity, habitat, clean water and air, flood mitigation, aquifer recharge, erosion control, climate regulation, etcetera.

To conclude, these Old Growth forests could and should be designated wilderness. All roadless areas, inventoried or not, should also be included in the protected areas to become mature and Old Growth, if they are

not already protected. Roadless, Mature and Old Growth lands, should be protected as Wilderness Areas, and will protect and increase abundance and distribution of Old Growth forests, which will help to mitigate the biodiversity loss and climate change crises.

I appreciate your consideration of my comments. I look forward to a response and a change in the Draft Environmental Impact Statement for Land Management Plan Amendments to Address Old-Growth Forests Across the National Forest System.

Sincerely,

Cheryl Joy Lipton

Attachment - Comment DEIS NOGA September 20 2024.docx is the letter text above.