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submitted electronically via web portal

Re: National Oldgrowth Policy Amendment Scoping Comments

Dear Director,

For nearly 50 years, I have engaged in recreation in the Gifford Pinchot National Forest in Washington, including hiking, camping, backpacking, birding, botanizing, wildlife viewing and landscape photography. Those activities led me to deeper engagement through volunteer advocacy for the Mount St. Helens National Volcanic Monument, the six legislatively designated wilderness area on the forest, and the many inventoried roadless areas. I have a file drawer filled with copies of my comment letters on timber sales that contain objections to logging oldgrowth forests which were, of course, ignored. It took federal listing of the northern spotted owl under the Endangered Species Act in 1990 to finally slow the logging, but the damage to the distribution, abundance and resilience of the oldgrowth forests in Washington's South Cascades already had been done.

I support the Forest Service's intention to implement President Biden's Executive Order 14072, "Strengthening the Nation's Forests, Communities and Local Economies," through the nationwide amendment of all national forest management plans. This is an important step in recognizing and conserving oldgrowth forests so they can do what they do best - store carbon, stabilize ecosystems, and support clean water, fish and wildlife.

I support the proposal to develop standards to prevent the degradation of oldgrowth conditions and to monitor implementation of the amendment. I am concerned, however, about the future durability of a plan amendment versus federal rule-making as federal government administrations and Forest Service leadership change over time.

The proposed Environmental Impact Statement (EIS) must fully consider alternatives with significantly strengthened protections of oldgrowth forests and protection of mature forests that, if left unlogged, can grow to replace some of the oldgrowth that has been lost. The Forest Service should, with very limited exceptions to address human safety, end logging of oldgrowth forests on lands it manages.

After reviewing the proposed amendment, I recommend the following changes be analyzed in at least one alternative in the EIS:

Strengthen the Amendment to Eliminate Commercial Logging of Mature and Oldgrowth Forests

The proposed amendment allows five exceptions to the standard limiting commercial logging to active stewardship. These exceptions are broad loopholes that allow commercial logging in mature and oldgrowth

forests. These exceptions should be strengthened to completely eliminate commercial logging and they should have better definitions and specificity since they currently are too open-ended and subjective.

The first exception is to reduce fuel hazards. The amendment and EIS should recognize that climate, not fuel accumulation, is the driving force in acres burned by wildfire. Thinning forests, for the most part, does not prevent large blazes under extreme fire weather. Since most of the acres burned by wildfire are caused by a few huge fires burning under extreme drought, high temperatures, low humidity, and high winds, thinning doesn't significantly alter those conditions. Indeed, thinning may open up the forest to excessive drying that makes it more likely to burn more severely if there is a fire. Advocates of thinning as a fire prevention measure seldom consider the loss of carbon storage and trees that result from logging.

Definitions Should Be Simple and Clear

Definitions of mature and oldgrowth forests for each forest type should be simple and clear so they can easily be applied on the ground. The structural complexity definition should focus on measurable structural characteristics.

Strengthen Conservation of Mature Forests

The proposed amendment should provide clear direction and guidelines on the recruitment of mature forests to evolve into future oldgrowth. The amendment should be strengthened to require either a minimum amount of acreage or a percentage of mature forests or some other specific measure to ensure that sufficient mature forest is protected in the recruitment pipeline. Recruitment should focus on high quality forests in natural stands rather than old plantations.

Strengthen Habitat Connectivity

Climate resiliency should include providing habitat connectivity for all species - plants, fish and wildlife - to ensure their survival. Mature and oldgrowth recruitment should help connect remaining patches of high quality oldgrowth habitat.

Strengthen Monitoring and Accountability

The proposal makes a good start at monitoring oldgrowth and mature forests to identify measurable changes under the amendment. Monitoring should track the development of mature forests into oldgrowth forests to replace those lost by past logging, wildfires, and insect and disease outbreaks. Monitoring should ensure the value of oldgrowth forest as a natural carbon sink is optimized over time.

Prioritize Carbon Storage

We need bold solutions that match the magnitude of today's existential climate change threats to both our national forests and our planet. Oldgrowth forests contain the bulk of all forest carbon. Logging oldgrowth forests releases 40 to 65 percent of the ecosystem's carbon to the atmosphere, even when off-site carbon storage in wood products is factored in. When trees are replanted on the site and begin accumulating carbon, it may take up to 200 years for those younger trees to sequester the carbon lost by logging.

Support Tribal Inclusion

Climate change has affected the interactions between humans, fire and vegetation for over 9,000 years in the Cascades Mountains. Over millenia, the integration of different Tribal cultures sculpted the ecosystems that occurred on the Gifford Pinchot National Forest at the time of its establishment, including cultural fire regimes that included seasonality, frequency, intensity and severity, specificity of site selection, topography and fuels, and ignition patterns. Tribal cultures burned for a range of resource objectives and to respond to shifting climate conditions. I support incorporating Traditional Ecological Knowledge along with western science to inform the purposes of protecting existing oldgrowth forest and recruiting future oldgrowth.

I urge the Forest Service to adopt a clear, meaningful, and enforceable nationwide forest plan amendment that ends the commercial logging of our remaining oldgrowth forests and provides stronger protections for the mature

forests needed to recover more oldgrowth over time.

Sincerely,

Susan Saul