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Comments: National Forest Service:

Thank you for giving me the opportunity to provide comments on The Land Management Direction for Old-Growth Forest Conditions Across the National Forest System #65356. First I'd like to stress the importance of mature and old-growth forests in sequestering carbon, The bigger and older the tree, the more carbon is stored within that tree. When it comes to logging, mature and old-growth trees are the "low hanging fruit". Obviously more lumber can be obtained from one gigantic tree than from many smaller trees which makes mature and old-growth trees an easy target for the logging industry. In fact, areas in which I have observed post logging I have seen the smaller trees left in the slash piles to be burned. This practice releases even more carbon into the atmosphere.

I am very happy that the Forest Service has proposed an amendment to all forest plans to restrict logging of old-growth forests and to direct stewardship of future old-growth forests. This is an encouraging step towards permanent protections for our forests and the trees that are critical to the climate and biodiversity of our nation. Mature trees hold the majority of the carbon stored on our national forest system. Conserving them is part of a climate solution.

The root systems of mature and old-growth trees run deep and are an integral part of our watersheds. When these trees are cleared it leads to flooding, stream bank erosion, sediment deposited in streams, a loss of fish habitat and a decline in water quality. Deforested watersheds are unable to properly filter water and regulate the amount of water for the communities that depend on them. Our old-growth forests play an essential role in providing wildlife habitat, species diversity, watershed protections, nutrient cycles, and many other ecological processes in addition to carbon storage.

This amendment to the forest plans is a great first step but the administration must develop a strong rule to protect mature forests and trees. There must be real protections for both mature and old-growth trees. This would include the threats of logging and mismanagement by the agencies.

As we begin to experience the effects of climate change we recognize that a century of fire suppression and over logging of our national forests has brought us to this critical moment in time. Older and larger trees are more fire resistant. Protecting them from logging as a policy will help the administration's goals in addressing wildfire. Communities must be protected from wildfire but the threat cannot be addressed at the expense of other ecological and carbon values. Protecting mature and old-growth trees should be a part of a national wildfire strategy.

An old-growth forest plan amendment is a first step toward a national rule that vigorously protects mature and old-growth forests. There is a deficit of old-growth forests as a result of inappropriate management. This needs to be acknowledged. Improving and expanding old-growth should be in balance with maintaining and developing old-growth conditions. However, natural succession should be prioritized over active management where possible. Logging needs to be acknowledged as a significant threat which should be within the agency's control. There are far more values in the benefits of protecting mature and old-growth forests than the shortsighted capitalistic incentives for timber.

I would like to propose including tracking of potential future old-growth in the National Old-Growth Monitoring Network in addition to tracking trends in current old-growth so that maturing trees have the protections necessary to become old-growth in the future rather than lumber.

Under section 3 of the Standards for Management Actions, not promoting logging projects where economic reason is the primary purpose allows for the more common practice of characterizing the project as ecological or for stewardship purposes, leaving economic gain as a secondary purpose. This would allow old-growth logging to continue under the guise of stewardship. I don't see that there would be much change where performance incentives for timber still exist.

In one or more of the alternatives stronger old-growth protections should be considered. The commercial exchange of old-growth trees should be eliminated. All logging of old-growth trees should be ended in stands where fire is infrequent and everywhere else. The Tongass exception should be eliminated. It is important that the definition of old-growth be consistent and inclusive. A narrow and overly complex definition will exclude substantial numbers of old-growth trees. The minimum age, diameter, and number of large trees per acre are too high and limiting. This leaves too many openings for justification of removal of old-growth trees that do not fall into this specific criteria. Instead the agency should consider the age of the trees as the definition for old-growth stands and trees. For example, all stands or trees 120 years or older or no less than the oldest 30% of the forest's stands whichever is greater or simply all trees 120 years or older. Following a fire, flood or other natural disturbance old-growth should not be redesignated since the stands will continue to provide benefits. Vegetation management that impacts mature trees should be justified by the agency in writing that the impacts are unavoidable for conserving old-growth values and should be site-specific based on scientific findings and informed by public input.

Alternatives should be considered that better advance old-growth recruitment goals. Each national forest should be required to show that all forest types demonstrate measurable improvements toward the goal due to retention, recruitment and natural succession within 10 years. Any such alternative should establish a national standard for substantive and immediate protection, include simple to administer limits on logging, provide for appropriate management for impaired ecosystems in dry forests, cut back on the commercial exchange of mature trees and ensure protection of the bulk of standing carbon in our National Forest System.

The Environmental Impact Statement (EIS) should disclose impacts from disturbance events including logging. It must provide a comprehensive analysis of disturbance events and the effects of management by disclosing the beneficial role non-human disturbances can play in a forest system. The agency needs to analyze potential comparative mortality of old-growth trees from logging to other disturbances and they need to analyze carbon emissions from logging compared to other disturbances. The EIS must analyze the harmful impacts of removing dead old-growth from a forest after a disturbance, keeping in mind the impact to a site's potential to become old-growth again in the future. The ecological benefits of post-disturbance old-growth stands in the first stage of forest development following any disturbance, including wind, ice, fire or logging should be analyzed. A holistic approach should be taken when analyzing risk mitigation techniques. The EIS must analyze and disclose the co-benefits of protecting older forests and when analyzing the impact of management on old-growth, water shed conditions should be examined closely.