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

I would like to comment on the amendment proposal:

This is an important step in protecting our Old Growth and Mature Forests (future Old Growth Forests) and we support the strongest protective measures.

It is a huge and complex challenge.

Policy should be considered that would attain the requisite level of conservation for OG areas so as to meet President Biden's 30 x 30 EO.

North America has a fraction of the primary forests it once supported and we believe that increasing future old growth forests is a necessary goal. Along with that it is important to "manage" for increased mature growth as well. We believe that increasing biodiversity and carbon storage must be included in this as necessary pieces for environmental stability and recovery at the necessary large ecosystem level.

Please note that older and larger trees tend to be the most fire-resistant, so a policy that protects mature and old-growth trees from destructive logging practices coincides with goals to address wildfire.

We also want to stress that management of our national forests reflect such important to all values as clean air and drinking water, species habitat, native and full biodiversity of flora and fauna, ecosystem connectivity, space for cultural practices, outdoor recreation, tourism and other complementary non destructive uses. Actually, taking on the biodiversity crisis needs and achieving 30x30 will require a landscape level strategy across North America, not a region by region strategy. Yes, a very tall order. Do your best please.

Communities must be protected from wildfire, and it is important to do so in a way does not undermine other ecological and carbon values. We believe it will be possible (yes, and difficult) for mature and old growth trees to be protected, improved and expanded, in parallel with a national wildfire strategy.

Please keep in mind that the deficit of Old Growth, as well as some Mature, is a result of ecologically inappropriate past management practices. Management is wholly within the agency's control and we request that the plan clearly articulate the prioritization of natural succession over active management wherever possible. Habitat, biodiversity degradation and loss is accelerated and mistakes of the past must not be repeated. First, do no harm and be careful of "fixes" which often aren't.

We believe that, as drafted, the amendment allows for too much cutting of OG - it looks like substantial OG logging would continue. Under Section 3 of the Standards for Management Actions, though logging would not be promoted as primary purpose we think allowing it as a secondary gain as currently written would end up maintaining the status quo. Performance incentives for timber are problematic as they stand. Interpretation of the current proposed amendment would allow this, so please tighten it up and change incentives.

We believe the Tongass exception should be removed. SASS is not enforceable or durable and there is no need to continue the transition or ramping down of OG logging, as it has been transitioning since 2013.

Provisions of standard 2(a) and 2(b) are often too vague and several of the exceptions are too open-ended. We believe the agency should draft carefully and narrowly the rationales and exceptions to fulfil the NPI's goal. Further, management done using 2(a)-(b) must be subject to public comment and of a high standard. Stronger OG protections must be considered in one or more alternatives

Other thoughts:

Include tracking of potential future OG in the National Old-Growth Monitoring Network, in addition to tracking trends in current OG.

Establish the Secretary as the only authority to revise, amend, modify, or otherwise change the operative provisions of the policy.

Prioritize and incentivize the value of OG benefits over the incentives for timber and shift metrics accordingly.

Incorporate policies to advance EO 14072.

Heightened standard review for vegetation management.

Include policies that would set a firm Old Growth recruitment goal.

Eliminate the commercial exchange of OG trees, logging of OG trees everywhere and consider ending all logging in OG stands where fire is infrequent.

The definition of OG could be more inclusive and more consistent. The proposed definitions are narrow, overly complex, and would exclude substantial amounts of OG.

The minimum age of what constitutes a "large" tree is often too high.

The minimum diameter of what qualifies as a "large" tree is often too high.

The minimum number of "large" trees per acre is too high and artificially limiting. There is also a risk of this standard being used to justify removing OG, so long as the minimum number of trees remain, where there are a high number of trees per acre.

The minimum number and/or size of standing dead trees required to qualify the stand as OG is too high.

Consider a simple, age-based definition for identifying OG stands and trees, such as the example below we are aware of:

East of 100th meridian =

All stands 120 years and older

No less than the oldest 30% of the Forest's stands, whichever is greater

All trees 120 years and older

West of 100th meridian =

All stands 150 years and older

No less than the oldest 30% of the Forest's stands, whichever is greater

All trees 150 years and older

Specifically do not redesignate Old Growth stands following a disturbance event when natural disturbances are unlikely to render OG stands unable to provide their key benefits. For mature trees, the agency should demonstrate that management actions are unavoidable for conserving natural mature and/or OG values and the agency should make a written, site-specific finding supported by the best available science .

Additional ideas/suggestions/requests in no particular order:

The agency considers alternatives that better advance OG recruitment goals.

Consider an alternative that articulates a clear old growth acreage-based recruitment goal based on the high bound of the natural range of variation (NRV) for each forest type within each national forest.

Within ten years, each national forest should be required to demonstrate that all forest types exhibit measurable improvements toward the goal because of retention, recruitment, and natural succession.

Any such alternative should feature several key mechanisms:

Establish substantive and immediately effective protection with a national standard.

Ensure the protection of the robust bulk of the standing carbon across the National Forest System.

Include simple-to-administer limits on logging.

Provide for appropriate management of impaired ecosystems in dry forests.

Curtail commercial exchange of mature trees.

Impacts Analysis:

The EIS must disclose impacts to carbon stocks from disturbance events, including logging, and must analyze and disclose the co-benefits of protecting older forests.

Area cannot fully capture the impact of a disturbance on the density or age distribution of trees within stands and forests. Carbon content (biomass) makes for a better proxy of impact because it is a weighted metric that corresponds to a higher value in larger, older trees.

The EIS must provide a holistic analysis of disturbance events and the effects of management. When analyzing non-anthropogenic disturbances, the agency must consider/disclose the beneficial role such disturbances can play in a forest ecosystem.

The agency should analyze potential comparative mortality of old-growth trees from logging vs other disturbances and analyze the totality of carbon emissions from logging vs other disturbance.

Analyze the deleterious biological /ecological diversity and invasives impacts of removing dead old growth from a forest post-disturbance, as well as impact to a site's potential to become old growth again in the future.

Analyze the ecological benefits of post-disturbance old-growth stands that have entered a complex early seral stage.

Watershed conditions are a key metric when analyzing the impact of management for old-growth characteristics along with a metric measuring the degree of forest connectivity and quality of habitat features present.

Thank you for your time and consideration.

David Stern and Elizabeth Perry