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Comments on Forest Plan Direction for old growth forest conditions across the national forest system

I live near the Bitterroot National Forest (BNF) in Hamilton, MT. I enjoy old trees and the calming feeling I get when I walk through an old growth stand. I also enjoy seeing the wildlife that live in mature forest ecosystems. Even if I do not see wild creatures, I find solace knowing that they exist in the forest nearby.

I submitted comments on the advance notice of proposed rule-making published on April 21, 2023 (88 FR 24497) and incorporate those comments in these.

I am concerned that the BNF's is working to commercially log old growth and mature forests across the forest and that this proposed rule will assist them. A lawsuit stopped one project from clearcutting old growth, but the BNF came back with a Supplemental Environmental Impact Statement (SEIS) that will allow them to cut old growth to minimum criteria that "may" allow for functioning old growth. The minimum criteria is 8 large trees per acre, approximately the size of a football field. Forest Service studies found an average of 17 large trees per acre in old growth stands on the BNF. Essentially it will be cut in half. Old growth stands should not be cut to the point where they might not function. Old growth harbors biodiversity supporting countless species. If it no longer functions as old growth, it no longer functions as habitat for dependent species, many listed as endangered by the Endangered Species Act (ESA).

I am instantly suspicious when I see the word restoration. It seems the USFS has hijacked what was once a great word. True restoration means decommissioning roads, removing clogged culverts, and restoring streams. But now it seems to mean commercially logging and clearcutting. The BNF that recently signed the Decision for a project that includes 4800 acres of clearcuts. This is not only the BNF. The Revised Nez Perce-Clearwater Forest Plan allows clear cuts up to 200 acres. I had hoped that the Forest Service had learned that clearcuts are damaging and highly unpopular with the public. But clearcuts are back.

The Forest Service has already asked the public to consider how to address wildfire, climate change, and mature and old growth forests during public comment periods over the past few years. All the comments represent countless hours spent. The comments submitted to the following should be included in the record and considered when addressing climate change, our national forests and grasslands, and land management plan direction for old growth forest conditions across the national forest system: USDA Notice of Request for Public Comment on the Executive Order on Tackling the Climate Crisis at Home and Abroad, 86 Fed. Reg. 14403-14404 (Mar. 16, 2021); USFS Wildfire Crisis Implementation Plan #NP-3172, comments due by Jul. 6, 2022; USDA Forest Service and DOI Bureau of Land Management Request for Information (RFI) on Federal Old-growth and Mature Forests, 87 Fed. Reg. 42493-42494 (Jul. 15, 2022), and USDA advance notice of proposed rulemaking published on April 21, 2023 (88 FR 24497)

The Forest Service received hundreds of thousands of comments on the advanced notice of proposed rulemaking concerning this direction. Most supported the protection of old growth and mature forests. Yet, this rule scales back protections for old growth and leaves mature forests out of the mix altogether.

Old growth is not renewable. It will not grow back even in one lifetime let alone two. A strong rule to protect both old growth and mature forests must be implemented. It must be an enforceable rule that prohibits commercial exploitation of these forests and protects them to the highest degree possible. This rule should amend NEPA regulations at 36 CFR 220.6(b) to state that the presence of mature forests is an extraordinary circumstance. Timber mandates must be reduced not increased threefold as they are in the Revised Nez Perce-Clearwater

Forest Plan.

Old growth and mature forests should be chainsaw free, livestock free, connected and fire-inclusive. No roads should be built or machines used to manage them. Until this rulemaking process is complete, a moratorium on all logging in old growth and mature forests must be put in place and enforced. These are precious, irreplaceable carbon storage and carbon sequestration forces working hard to regulate our changing climate. Commercial logging can make a fire more likely to catch and spread quickly. Logging increases fine fuels on the ground. Opening the canopy increases sun exposure and dries out fuels. And removing trees and shrubs opens the landscape to wind. Climate is the driver of large fires, not fuels. Carbon sequestration will mitigate climate. Our forests are a big part of the answer.

Instate a moratorium on bulldozing of firelines in Wilderness, WSAs, Recommended Wilderness, and Inventoried Roadless areas. These areas abound with mature and old growth forests and are generally far from communities.

Include mature forests in this direction. Their omission will drive climate change. These forests must also be preserved for biodiversity and carbon. The direction must recognize the greatest threat to old growth and mature forests is logging. Logging threatens biodiversity and carbon storage.

The loopholes allowing old growth logging for forest health, fire management, and resilience are large enough to drive a train through. They should all be eliminated. Old growth forests have adapted to every natural disturbance out there, but they have not adapted to commercial logging, road building, and mechanical soil compaction. Protect mature and old growth forests regardless of natural disturbances that may occur.

Trees must be prioritized for their ability to sequester and store carbon. New tree growth that evolved after logging can emit carbon for up to 20 years. Logging large trees is literally a lose-lose situation. Forests must also be prioritized for biodiversity and habitat for sensitive and listed species.

Stop the exception to logging in the Tongass. This is a huge body of old growth and mature forests that must be left intact to mitigate climate change.

It is important to emphasize that even large wildfires, consume less than 2% of tree carbon. Thinning operations release a considerably higher amount of carbon compared to wildfires.

Old growth and mature forests, wildlife, and large trees in general are important to the public for many reasons. Please act in the public interest.

Thanks for considering my comments.