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Comments: USDA Old-Growth Initiative public comments

To the Secretary of Agriculture:

Thank you for the opportunity to comment and please consider my questions and requests.

#### Definitions: Mature Forest Must Be Included in the Rule

This policy uses the same regional definitions of old growth that were used in the Mature and Old Growth Definitions and Inventory (see page 31 of that document). I have concerns that this policy covers only old growth, it does not contain any definition of "mature." Why was "mature forest" dropped from the rule? Section 2(c)(iii) of Executive Order 14072 directs USDA and DOI to "develop policies, with robust opportunity for public comment, to institutionalize climate-smart management and conservation strategies that address threats to mature and old-growth forests on Federal lands." The proposed rule, Land Management Plan Direction for Old-Growth Forest Conditions Across the National Forest System #65356, while an important step forward, inexplicably omits mature forest despite these preceding directives.

#### Primary Purpose of Management

"Economic reasons" should not be the "primary purpose" for old growth logging on public land and it is not a common practice of the USFS, but I argue it has happened and will continue if we don't strengthen our policies for climate resiliency. The flaw or the bias grows when there is no prohibition on selling trees when the cutting is justified by the USFS on ecological grounds. Currently, it is ambiguous to me whether economic factors can be a secondary purpose used to justify management in old growth. The language allowing for management in old growth "if necessary" given human behavior worries me that it will be used as a loophole to begin new management projects in mature and old growth forests. There is a Need for Change due to Climate urgency.

Management projects by the USFS are often proposed for the primary purpose of wildfire mitigation or ecological management. I prefer a policy where there can be no selling of mature and old-growth forests for timber, not for any reason, economic, wildfire mitigation and especially not from "ecological management". The primary purpose of protecting and conserving mature and old growth forests must change now and it must be reflected in policy that these designated and monitored forests will be protected for climate resiliency and not logged or burned. I hope that we can all come to an agreement on a clear policy where there is little chance of a justifiable "purpose" leading to cutting these designated mature and old growth trees. Need for Change.

Specifically, the Buffalo Springs project is most concerning to me. All of my life I knew of the "Buffalo Trail or the Trace" and I knew it was near where I grew up in both Lawrence and Orange Counties. I read about it in school when I was young and later Indiana State Highway signs were installed along IN 50, that marked the original Buffalo Trace and commemorated it as "Indiana's Historic Pathways". It was only in the past few years that I hiked into the Hoosier with guides to see the historic and undisturbed Vincennes Trace or rather Old Buffalo Trace, as I knew it. It had to be pointed out to me because it's part of the forest and is no longer obvious. There are parts of the Trace that are still intact in large sections and are obvious once pointed out. The Trace is an ancient road cut into the Earth originally by Bison and traveled also by Native Americans, frontiersmen and later settlers with wagons. The abandoned pathway in the forest resembles a leaf-littered "half pipe", a trail worn down into the Earth 4-5 feet deep in some remnants. It is true that most of the forest had been logged and cleared for agriculture long ago in what is now the Hoosier National Forest. But the forest is back and some old growth is present now and more is right around the corner. The Buffalo Trace is a cultural treasure and I cannot place a

value on it.

I oppose the Buffalo Springs project for two reasons.

If the USFS Buffalo Springs project is allowed to proceed the landscape of the forest will be forever altered from its natural state and the Buffalo Trace will be destroyed. The forest has regenerated and is in the most natural state it has been in for over 100 years. If this project moves forward it will allow huge tracts of forest to be logged and allow heavy equipment to drive over the Buffalo Trace, destroying the historic natural and manmade land feature carved into the forest floor by centuries of travel by animal and man. The Trace should be protected and celebrated as an "Indiana Historic Pathway". I oppose the scope and the timeline of the project. I question the value of vegetative management at this time and ask that it be reconsidered due to climate resiliency vulnerabilities. Need for Change.

I oppose both the Houston South and the Buffalo Springs vegetative management projects because they are not aligned to the relevant 2022 Biden EO. The Hoosier National Forest and other such forests on public land should be re-evaluated and included in the inventory and designation of protected Mature and Old Growth Forests for Climate Resiliency. Please consider these areas for Interim Protection. Need for Change.

A guideline applies to areas that do not currently qualify as old growth but are identified in the Adaptive Strategy as a priority for future old growth. It aims to steer proactive stewardship toward increasing the amount, representativeness, redundancy, and connectivity of old-growth conditions. The guideline provides management direction but does not establish any specific protections. I hope that the Adaptive Strategy can be tailored to each forest successfully and I support the guidelines being created in this way and would hope for protections to be outlined more specifically in each Adaptive Strategy.

"Providing consistent national direction that recognizes the beneficial role that functional old-growth forest conditions play in enhancing forest resiliency to wildfire further strengthens efforts to abate the wildfire crisis." is valid if it is applied to a fire-adapted ecosystem.

Eastern Hardwood Forests are not the same type of forests as out west or up north, right? Regarding the statement, "The proposed action also recognizes the importance of strategic conservation and proactive stewardship for wildfire resilience efforts, including science-based vegetation treatments and restoring prescribed fire in fire-adapted ecosystems, for the long-term retention and future recruitment of old-growth forest conditions." I would hope that there would be a strategy in place for the correct type of forests to be managed for fire that receive government money for projects that are suitable terrain and that a non fire-adapted ecosystem would not be considered a valid applicant for such management funding.

"Given climate amplified stressors, management actions must be guided by science, including Indigenous Knowledge, intentionality, and commitment to evaluate the effectiveness of strategies designed to further desired old-growth forest conditions.

Objective- 1. Within ten years, at the unit level, at least one landscape prioritized within an Adaptive Strategy for Old-Growth Forest Conservation will exhibit measurable improvements in old growth desired conditions as a result of retention, recruitment, and proactive stewardship activities and natural succession." I appreciate the 10 year goal and would hope the results will be quantified and shared with the public along the way leading up to 10 years. It is a pleasure to be invited to review findings and to comment and I hope this process continues.

"Standards are proposed to prevent degradation of old-growth conditions and to enable conservation and proactive stewardship within old growth forest conditions to foster or increase resilience to disturbances and stressors that may have adverse impacts. Proactive stewardship includes ecologically appropriate management and recognition of when natural succession processes can support achievement of desired conditions. A guideline is proposed to encourage proactive stewardship to increase amounts and improve distributions and climate resiliency of future old-growth forest conditions."

I hope that Standards and Proactive Stewardship will be based on science that is available from many reliable

sources and alternatives will be considered to past practices for effective climate resiliency.

I am encouraged by this positive, respectful and open new process of gaining knowledge in areas where we haven't looked before, growing our ideas and considering new practices to be helpful to ourselves in our situation. I appreciate the Improvement of making decisions based on a wider pool of scientific data that includes Climate Science. I cannot find the date that the Office of Sustainability and Climate was established in the USFS but I am glad for it.

In writing a recent, peer-reviewed paper on forest-clearing for early-successional habitats, Kellett, et al., 2022 found that human manipulation of natural forests has questionable benefits and significant negative impacts. Kellett, et al., 2022 concluded that we need a lot more wildlands that are protected from logging and other human resource exploitation. Please also consider this peer reviewed science:  
<https://www.frontiersin.org/articles/10.3389/ffgc.2022.1073677/full>

I see my favorite, the Hoosier National Forest, is on the list to be considered for mature and old growth designation and protection. Please consider this as my testimony and my request for protection as a person that grew up with my family in southern Indiana and now have my own family that is growing up in southern Indiana surrounded by the Hoosier National Forest. I have lived in Lawrence, Orange, Monroe, Marion, Johnson and Bartholomew Counties and I have been in or near the Hoosier my whole life. I am of the opinion that the USFS Vegetative Management projects, Houston South and Buffalo Springs are too damaging and would be an irrecoverable set back. I ask that those projects be re-evaluated and considered for Interim Protection.

I appreciate the USFS Sustainability and Climate team and all those that have worked on the ANPR and continue to work and assess the Need For Change. I appreciate the national, professional and human effort that is going into this work.