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Comments: I am writing to encourage policy makers to take a measured approach to the issue of old growth. Many parts of the discussion surrounding old growth forests make the issues seem black and white. Common themes I hear regularly boil down to the simplified message of "old growth is best and actively managed forests are less than best". I am a forester and as part of what I do is see the in-between. There is rarely black and white when it comes to what we do when we (as humans) work with the natural world or anywhere else for that matter. Very few things are either wholly good or wholly bad; it's all a matter of perspective of what is most important which changes over time. In addition, the effects and impacts of our actions or inaction must be investigated at scales near and far, both temporally and spatially to develop policies and make decisions.

Old growth forests and their associated characteristics are important. This is true for both human and non-human communities and their benefits are wide-ranging. Responsible stewardship of forests can and does mimic old forest characteristics and can simultaneously provide humans and non-humans with other goods (i.e., forest products for one) and services (i.e., immediate diversity of species mixes and habitat conditions).

In our collective rush to develop solutions to address a changing climate which impacts all of us, and our desire to do something dramatic and impactful to do our part (both as humans and as Americans) it is important that we keep in mind the entire systems we're working with and their long-term sustainability. This is true for both natural systems and human systems. Specifically, as it relates to how the USDA Forest Service should address this issue, it is important to keep USFS's multiple-use guiding principle in mind. Continuing to balance existing goals of forest health (nebulous as that concept may be), diverse wildlife habitat, water quality, soil stability, recreation, and all the economic and human benefits associated with the sustainable production of forest products, combined with the somewhat newer goals of climate resilience, and continued capture and storage of carbon playing roles in part of the decision making is all important. Part of the resilience discussion is continuing to encourage size class, age class, and species diversity, all of which is a significant part of what the Forest Service already does under the overarching goal of promoting diversity.

Designating any area as an area that will intentionally be passively managed moving forward has long-term impacts which can be positive or negative for that area and others. It is important to keep in mind that there are many areas within USFS ownership that are already passively managed and are likely to remain so perhaps in perpetuity. In addition, there are many other federally owned lands on which active management is not practiced (most land owned by the National Park system as one example) which need to be taken into account when making decisions about passive management in perpetuity. Maintaining the USFS's ability to make decisions about land and forest management with changing conditions is critically important. Any land that has an in-perpetuity designation must be given such a designation with a thorough examination of all the known potential impacts, locally, regionally, nationally and even globally.

It is important to realize that there are impacts of preserving a piece of land here (i.e., intentionally managing a parcel passively in perpetuity) which are felt by human and non human communities at all levels. This relates to forest products, wildlife habitat, and in some places overall forest resilience. The part of this relating to the elimination of the production of forest products that results from a passive management approach is frequently overlooked. Forest products will continue to be needed, and they will be produced elsewhere. That represents an impact to the forests where the products will be generated (whether that is another part of the country or the world) and has an opportunity cost for us here when we decide not to produce what we use. In addition to the potential opportunity cost, there is a shirking of responsibility when we intentionally reduce our capacity to produce something ourselves in the global resource pool. Increasing our ability to sustainably produce wood and other forest products we use in America can be part of the solution to carbon demands worldwide.

As is noted in the summary for the proposed language (Land Management Plan Direction for Old-Growth Forest Conditions Across the National Forest System, Section 2c Item 5), there is no one size fits all policy that is applicable to all the forests within the USFS system. This heterogeneity applies to different forests in each region, but also to different blocks or even different stands within a single forest. It is necessary to view each situation within any area through the lens of that region's ecosystem, the condition of that stand, and the landscape in which it is found.

Where it is determined that promoting old forest conditions is appropriate, it is important to remember that achieving that goal is not necessarily a single stream linear decision model when it comes to the management of that forest. There are indeed regionally applicable methods of stewardship involving active forest management to enhance old forest characteristics intentionally in ways that occur faster and within the footprint of desired areas while still providing other benefits (including forest products and the creation of specific habitat conditions among others) in the relatively short-term (20-50 years). (D'Amato, A.W., and P.F. Catanzaro. 2022. Restoring old-growth characteristics to New England's and New York's forests. University of Massachusetts, Cooperative Extension Landowner Outreach Pamphlet, 36 pp.)

Efforts to find places that work well for perpetuating old growth forests and old forests characteristics should persist and be increased. Where and if any actual old growth forests (pre-European contact in terms of timing, or old forests with old growth characteristics in terms of structure) exist it is important to identify those areas and develop explicit policies on how they are to be managed and researched to protect important values, learn from their existing conditions, and observe how they change over time. [The first suggested definition of old growth - pre-European contact - suggested in the last sentence is somewhat fraught because may be an implicit supposition that there was limited human interaction with those areas, which negates the very real interaction that indigenous people had with the forests in which they lived. This also assumes that human interaction with a forest somehow negatively impacts a forest's ability to be old growth or provide the same functions that less manipulated forests provide, neither of which is absolute.] That needs to be carefully balanced with the needs of the communities (human and non-human) that depend on the multiple-use active management that the USFS has been doing for over 100 years. There is room for improvement, learning, and adaptation to modify the management that the USFS does to incorporate new and necessary goals, but a major shift in the guiding principle from multiple-use toward large scale preservation will not serve the human or non-human communities that depend on our forests well over the long-term.