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Comments: Dear Friends,

The US Forest Service's old-growth policy proposal misses the mark in two main ways:

1. It creates conditions for more logging of old-growth trees and stands in New England's National Forests, not less. The Forest Service is proposing that, so long as commercial timber harvest is not the primary rationale for a logging project, old-growth forests are fair game for cutting as long as they can create an ecological justification. As we and our partners have experienced time and time again, the Forest Service rarely - if ever - cites commercial timber harvest as a primary rationale for logging, and it has no problem manufacturing faux-scientific reasons to conduct harvests in even the most sensitive locations. Old-growth forests in the Northeast US are at greater risk from the impacts of logging than they are from climate change, insects, and disease.

The state of Massachusetts recently released its Report of the Climate Forestry Committee: Recommendations for Climate-Oriented Forest Management Guidelines. The committee was composed of foresters, ecologists, and scientists from the private sector, NGOs, and state government. Here are some highlights from their report:

"The Committee found no ecological rationale for salvage harvesting and noted that it usually represents a short term (10-20 year) carbon loss to the atmosphere in comparison to leaving the wood to decay" [emphasis added] (p. 6).

"The Committee strongly agreed that ecological disturbances, even when they are more frequent and intense due to human activity, are an important and necessary aspect of forest ecosystems as they serve to increase the structural and compositional complexity and dead wood that are often lacking in Massachusetts' forests because of the region's land-use history" (p. 30).

"The Committee was deeply skeptical of pre-salvage harvesting (removal before trees are affected by a pest or pathogen) and the notion that it is ecologically beneficial" [emphasis added] (p. 31).

And yet, the Forest Service is proposing to give itself leeway to do exactly the type of salvage logging that the experts behind the Massachusetts report argue is ecologically unjustifiable.

2. The proposal includes no substantive restrictions on mature forest logging, meaning the Forest Service will continue to heavily log the nation's future old-growth forests. Old-growth forests historically dominated New England's landscape prior to European arrival, but today they are nearly absent, comprising less than one-tenth of one percent of the region's land area. One of the most rigorous attempts at quantifying old-growth forests in the Eastern US calculated that 83.7% of what remains in the Northeast is located on state and federal public land. Mature forests, or "future old-growth," is also more abundant on public land than on private land across the Northeast.

In recent years, logging has increased dramatically in state and federal forests around New England to remove timber at its maximum economic value, which corresponds with the threshold of forest maturity, typically when stands are in the range of 80-150 years old. This also happens to be the age of a significant percentage of the forest managed by the US Forest Service in the Green and White Mountain National Forests.

The Forest Service's policy proposal provides no protection for mature forests, including much of the land

targeted for logging in the Telephone Gap, Lake Tarleton, Sandwich Range, and other projects that Standing Trees is working to stop.

Thank you.