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Comments: Thank you for proposing this National Old Growth Amendment. The protection of old growth forests on US National Forest lands is an long awaited, far-reaching, and, critical, conservation priority for our country's natural resources.

Forests provide many benefits, protection of watersheds, wildlife habitat, carbon conservation, clean air, recreation, and forest products. But we have long neglected to protect a core part of any forest ecosystem, its old growth component. Thus, we have lost the vast majority of our nation's old growth.

It's long past time to embark on a vigorous program to protect existing old growth, and to protect mature forests which are needed to ensure forests which can develop into future old growth.

This proposed amendment is a start, but it falls short in several areas.

The USFS earlier requested forest managers to survey and assess old growth in their districts to fulfill EO 14072 . That was a challenging and good initial step, but one that needs more follow-up and refinement. Forest types are complex and varied, definitions of old growth need to recognize that. Surveys for old growth need to be sensitive to that because when survey criteria are a mismatch to the ground level forest type, undercounting is sure to occur. This would likely result in loss of old growth.

Without improvements to old growth assessments, attempts to protect old growth will be handicapped from the start. The proposed National Old-Growth Monitoring Network is a promising idea. But it will need to be willing to take a hard look at forest diversity and survey methods. And that network needs to be able to correct past inconsistencies.

This amendment needs to provide more direct requirement now, on how and when forest managers need to improve their surveys and how to use survey methods which are not biased.

See <https://www.science.org/content/article/how-much-u-s-forest-old-growth-it-depends-who-you-ask>

The proposed amendment does not set requirements or even clear guidance on protecting mature forests, which can become future old growth. This is a major shortcoming. The proposal does mention "recruitment" as one part of improvement of old growth. But that is too vague. Forest management and protection is a long run endeavor . Without planning for enough mature forest protection, this amendment will not succeed.

The amendment needs to provide more clarity on how much old growth needs to be protected. The assessment does recognize that individual National Forests vary widely on to what degree, if any, they have already added some planned old growth protection within their Forest Plans. How to assess what was the pre-settlement presence of old growth, and how to assess the need for intact old growth in today's very fragmented forests, requires more clarity and guidance that is in the present proposal.

The proposed amendment is too flexible on permitting routine or even extreme management actions within old growth designations. Even in today's climate change world, the management of old growth's first principle should be hands off. Any actions beyond that should be taken cautiously and rarely.

Fire is a major factor in management of western forests, and to a lesser extent elsewhere. In many cases if managers approach old growth with the same type of pre and post fire management as younger forests, then old growth will be at great risk. Also, managers will not benefit from the fire limiting characteristics that old growth can sometimes provide. See: <https://fireecology.springeropen.com/articles/10.1186/s42408-021-00118-z>

The proposal's recognition of the impact of climate change is a welcomed acknowledgement. Climate change obviously presents challenges to forest managers. Approaches on public and private lands vary. Some more proactive suggestions are to adjust species mix towards those which are more likely to thrive in a changing climate.

But management of old growth should permit natural changes to occur. Old growth forests can provide a climate benefit by storing carbon.

Many of us look forward to engaging with our local National Forests to complete the job laid out in this proposal. We hope some of that engagement can also address the shortcomings outlined here.

Finally, the Dept of Agriculture should support sufficient targeted funding for local National Forests meet the actions required in the proposed National Old Growth Amendment. The many tasks involved in improving inventory, monitoring, planning, and engaging the public cannot be successfully carried out without specified funding.