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Comments: Date: September 19, 2024

Attn: Randy Moore, Chief of the USDA Forest Service

Subject: DEIS comments re. the Amendments to Land Management Plans to Address Old-Growth Forest Conditions Across the National Forest System #65356 (The National Old-Growth Amendment)

I applaud the USDA Forest Service's extensive work in response to EO 14072 and appreciate this opportunity to comment on the DEIS for the National Old-Growth Amendment (NOGA). I have always been interested in prudent, forward-looking approaches to natural resource management, and as a conservation voter living in the USFS Region 6/Pacific Northwest ecogregion, and having familiarity with the Pacific SW/Region 3, I am particularly interested in National Forest System protections for old-growth/mature-growth forests, including their watersheds and biodiverse fauna & flora.

I am hopeful that the Forest Service will adopt an LMP Direction for Old-Growth Forest Conditions that ensures strong, inviolable protections and unambiguous terminology in order to (1) preserve our remaining old growth and (2) strengthen tree recruitment using the Forest Inventory & Analysis Program and other tools to ensure the abundance of future old growth and diverse forest ecosystems.

First, recognizing that there have always been conflicting societal values regarding how national forests (and other public lands) should be managed, I believe that now is the time for everyone to place the highest value on the protection of old-growth forests. I respectfully suggest that all agencies and forest users, Indigenous Peoples as well as non-indigenous -- including those who anticipate old-growth timber revenue and those who enjoy recreating in old growth -- rethink activities that reduce or harm old growth. And, as some have suggested, those who use living old growth for art or crafts should instead either limit themselves to "carefully taking what they need from bark, branches, and trunks," or else find alternative materials in order to preserve the integrity of old-growth forests.

Second, recognizing that conflicting values impact wildland firefighting policies, and knowing that the USFS Analysis of Threats states "mortality from wildfires is currently the leading threat to mature and old-growth forests, followed by insects and disease," it is more important than ever to advance both the public's and agencies' understanding of fire-resiliency in old-growth stands, and not to view cutting old growth as a solution to forest fire threats. While I believe everyone knows that increased fire-suppression budgets will not sufficiently reduce the risk of catastrophic wildland fires and also that best practices for wildfire management requires solving complex

fire-technology and ecological puzzles, I hope that everyone will agree on the cessation of cutting old-growth/future-old growth forests, instead expanding conservation strategies such as judicious prescriptive burning and fire-adapted communities.

Third, the NOGA does not go far enough in directing forest managers to identify and steward mature forests. The final NOGA should include clear guidelines for designating mature stands that are best suited to become old-growth, and these guidelines should include a proper representation of all forest types within each management area, with connectivity and redundancy to account for future disturbance.

To this point, if I might add a personal concern, what the agency calls a "consistent" approach to managing old growth and mature growth is not clear. What about policy descriptors like "precise," "accurate," and "appropriate"? I cannot ascertain from the NOGA DEIS or LMP what the term "consistent" means in statements such as "There is concern over climate-amplified disturbance impacts that pose a threat to the persistence of old-growth forest conditions on the National Forest System lands, and an understanding that current management practices may benefit from consistent direction to reduce vulnerabilities and increase resilience to stressors." A dictionary definition of "consistent" -- "unchanging in nature, standard, or effect over time" -- does not allay my concern about this vague terminology.

Now, regarding the NOGA timeline: The DEIS period for NOGA comments, including questions about wildfire management as well as other NOGA components, has been too short to allow for complete, meaningful engagement. The timeline certainly has not allowed for resolution of the concern that the top-down approach in this national amendment has not fully addressed local/regional environmental conditions.

And regarding the two-year timeline for establishing a National Old-Growth Monitoring Network (in which the LMP directs the agency to "identify initial criteria indicating where these plan components will apply and include such identification in the biennial monitoring report or the broader scale monitoring strategy . . ."): Two years is far too short a period of time to integrate input, including from different levels of governance and local communities, both Indigenous and non-indigenous, and to fully coordinate with other policy proposals such as the Wildfire Crisis Strategy.

Given my values and concerns, I ask that the final record of decision be Action Alternative 3: No timber harvest or commercial exchange of forest materials on old-growth public lands. No agency should have discretion to reduce/cut old growth in pursuit of "proactive stewardship" goals. And old-growth/mature-growth forest management strategies should include not only ACTION area plans but also specific area NO ACTION plans: E.g., NOGA should clearly call for passive stewardship of certain old-growth/mature-growth areas like the rainforests of the Pacific Northwest and the Tongass in Alaska.

Accordingly, with Alternative 3, in keeping with "no timber sales" of old growth, if/when judicious thinning treatments or salvage operations are deemed necessary -- such as for Hazard Fuels Reduction or post-wildfire

management -- there should be a legal requirement that revenues from the operation be re-invested in the old-growth or mature-growth forest from which they were derived. And no old growth should ever be sent to mills.

There is compelling logic behind my asking that the NOGA decision will be to no longer permit any old-growth timber harvests/commercial logging on National Forests:

\* Economically, the small amount of old-growth timber supplied by USFS timber sales -- less than 3% of old-growth national forests -- is not needed to meet U.S. timber demand.

\* Ecologically, especially re. climate-change resilience and wildfire resilience, the value of old growth and old-growth/mature-growth forests -- in terms of climate-change stress mitigation, lower-intensity fire/natural fire resistance, carbon sequestration, watershed protection, flora & fauna biodiversity, and more -- is immeasurably greater than the monetary value of their timber. As the State of Oregon Natural & Working Lands Report stated (<https://climate.oregon.gov/natural-working-lands>), "While significant funding will be needed to achieve the sequestration and storage goals, the financial savings from avoiding the worst impacts of climate change and the value of the natural and working lands goods and services we protect will far exceed those costs."

\* Philosophically, the old-growth forests should be left uncut so that we humans may continue to learn from the wisdom of evolution in natural systems, and so that we may continue to benefit from recreating in these forests and enjoy what one writer called majestic beauty that is as awe-inspiring as "light pouring in through stained-glass windows in a Gothic cathedral."

\* And in terms of human health, community stability & safety, and habitat diversity, particularly in areas of urban-forest intersection and rural communities adjacent to old-growth/mature-growth forests, there should be prioritization of protecting these forests in order to maintain clean drinking water, reduce soil erosion, prevent landslides on slopes, and more -- like reducing risks from droughts and floods, which not only are increasing from climate-change stress but also are created by clear-cutting. The protection of old growth/mature growth also provides for healthy, stable forest-floor habitat and watershed ecosystems that have so many benefits for humans as well as wildlife and flora.

In summation, I support the adoption of the "More Restrictive" Action Alternative 3 with the addition of the Standard 3 clause stating "Proactive stewardship in old-growth forests shall not result in commercial timber harvest."

I therefore ask for

- \* The end to timber harvests of old-growth trees in all national forests, in all forest types.
- \* The end to any commercial exchange of old-growth trees and forest materials. And old-growth trees should not be sent to timber mills, not even in the rare circumstance where an old-growth tree is cut (e.g., for Hazard Tree Removal).
- \* The legal requirement that revenues from old-growth/mixed-old-and-mature-growth forest treatments and salvage operations be re-invested in the old-growth/mature-growth forests from which the revenues were derived.
- \* The elimination of agency discretion to manage old growth "out of existence" in pursuit of "proactive stewardship" goals or in using policy "loopholes" that allow for old-growth logging, including post-fire management and "de minimis" allowances for logging of old growth.
- \* The adoption of passive management strategies in old-growth/mature-growth stands in moist forest types like the Tongass, PNW rainforests, and coastal Redwood ranges.
- \* The reinstatement of Standard 1 from the Notice of Intent, which states that management activities "must not degrade or impair" old-growth forests.
- \* The establishment of clear guidance and broad communication of requirements for measurable goals and planning for recruiting future old growth, including from forests that are currently classified as mature to make up for historic losses of old growth due to logging.
- \* The inclusion of further directives and guidelines for forest managers to identify and steward mature forests within their forest types, individualized within each forest management area.

Thank you again for the opportunity to participate in crafting NOGA. And thank you for your work as protectors of our precious forests.

Sincerely,

DJ Fletcher