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I thank you for the actions you have taken so far for our federal old-growth forests and I am writing with comments regarding the Land Management Plan Direction for Old-Growth Forest Conditions Across the National Forest System Draft Environmental Impact Statement (DEIS) published on June 21, 2024.

Through President Biden's Executive Order 14072 (EO 14072), the US Forest Service (USFS) and Bureau of Land Management (BLM) were directed 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 forest on federal lands." While the stated goals represent a strategy long needed for the country's forests, the DEIS Alternatives as currently stated do not represent the best of our available tools and approaches toward meeting that goal nor do they address the portion concerned with mature forests. Detailed corrections laid out in this letter could substantially improve the policy's ability to establish meaningful protections for old-growth forests on federal lands. In respect to the DEIS provided, I am commenting to support an Alternative not currently reflected in the DEIS as well as improvements on the currently provided Alternatives.

I am concerned that the Executive Order's original direction for "management and conservation strategies that address threats to mature and old-growth forests on federal lands" as they are addressed by the DEIS are built on a flawed representation of old-growth conditions and threats across all federal lands. The June 2024 Threats Assessment states that threats to old-growth forests in the eastern United States were not evaluated due to lacking inventory data. The DEIS cannot adequately propose conservation strategies to address threats that were not assessed. The USFS must explore more robust inventories of old-growth and develop regionally appropriate threat assessments for this area through the Adaptive Strategy for Old-Growth Forest Conservation.

Alternative 2, though it has been identified as the agency's preferred Alternative, should not be adopted because it codifies avenues to commercially log old-growth forests in ways that will undermine the intent of the Executive Order. Even if the policy specifies that commercial opportunities cannot be the main purpose of logging as a management approach in old-growth areas, there are still financial and commercial motivations involved and projects could easily be justified by using any other management purpose by name only.

The final record of decision would benefit from a modified Alternative 3 that maintains the updated Standard 3 (NOGA-FW-STD-03) in which "Proactive stewardship in old-growth forests shall not result in commercial timber

harvest." We support Amendment 3's provision to restrict commercial logging or timber harvest in identified old-growth areas. Any financial incentive to log these forests will undermine the goals of the amendment and the desired climate and conservation outcomes of EO 14072.

Alternative 3 would also benefit from more fine-grained and specific protections for old-growth trees as a component of old-growth stands. Old-growth trees should not be subject to commercial exchange and any logging of these trees should be done with only the most limited exceptions, such as trail maintenance, hazard tree removal, and individual tree selection for traditional and cultural uses by Native American and Alaskan tribes. Old-growth trees are essential parts of current old-growth definitions created by the US Forest Service across many forest types, and removal of these trees jeopardizes a loss of old-growth status according to these definitions. Old-growth trees also have outsized structural, ecological, and social benefits while also serving as important genetic repositories for forest resilience. Old-growth trees also store the most above ground carbon and are often more resilient to fire, drought, and disease than younger trees.

Management of existing and future old-growth areas should not allow proactive stewardship that results in commercial timber harvest because of the negative impacts on soil, seedlings, roots, and carbon sequestration and storage of the forests as whole, in addition to impacts on individual trees. Logging cannot truly mimic natural disturbance and cannot provide the resilience, ecological, and carbon-storage benefits that are created in forests with minimal active management. Even within vegetation management practices designed to mimic disturbance in fire-adapted forest communities that have long gone without their natural fire regimes due to human interference, large and old trees should not be removed because they are often fire-resilient with high canopies and thick bark. Any logging of non-old-growth trees that may take place within old-growth stands as a part of proactive stewardship within very limited exceptions should not be related to USFS timber targets or performance measures. In particular, no proactive stewardship that includes logging should take place in old-growth stands that are of infrequent fire regimes.

As the policy is currently written, there are issues with the outlined Standards that undermine the direction of the Executive Order to institutionalize conservation strategies for mature and old-growth forests:

1. Standard 2.a. allows vegetation management to occur in old-growth areas for the purposes of proactive stewardship. Despite being highlighted in the section 2.3.2 Misconceptions Regarding the Proposed Amendment, it remains unclear how an area will maintain qualification, consideration, and protection through this amendment if actions taken there make it no longer meet the definition of old-growth immediately following treatments. The existing conditions that qualify the forest as old-growth should be maintained as an aspect of proactive stewardship, not degraded or destroyed. The nondegradation standard should be reestablished in the final decision.

- a. Logging does not truly replicate the natural disturbance dynamics that have shaped old-growth forests. Even when trees are cut, permitting their removal from a forest degrades the inputs of standing and downed dead wood that are a critical component of old-growth forest conditions and contribute to carbon storage in these forests.

- b. Protections for old-growth forests under the policy should remain even if natural disturbance affects the narrow definitions of old-growth to which this policy applies. When natural disturbance does occur in an old-growth stand, such as a beetle outbreak, mortality or changes in aspects of one part of how it qualifies as old-growth should not disqualify it from meeting the definition, as old-growth forests are defined not just by tree age and size. At times, aspects of old-growth forests can be enhanced during natural disturbance events, such as coarse woody debris and areas should not be disqualified just from one facet of the definitions.

- c. The working definitions and minimum criteria developed by the USFS for old-growth areas should not be the targets for management and proactive stewardship. Treatments should not be based on retaining these

characteristics as the ceiling for what qualifies an area as old-growth, rather, they should be treated as a floor with the goals of old-growth areas exceeding these criteria as far as possible.

d. Non-degradation standards should apply at the stand or site-specific area level, not the plan level. Because plan levels can be vast, managing one area of old-growth out of qualification should not be justified by persisting old-growth elsewhere in the plan area.

e. Passive stewardship of old-growth forests should be the Forest Service's primary tool for managing old-growth forests and prioritized within this final decision. Passive Stewardship is suitable for a wide range of old-growth forest types and their current conditions and is a cost-effective climate solution that is immediately available. Logging and vegetation management are practices that cause immediate losses of carbon storage and carbon sequestration potential from a forest and in the context of all carbon loss from disturbance, is one we have immediate control over to mitigate.

2. The exceptions outlined within Standards are too broad for this policy to create meaningful protections for old-growth trees. These exceptions should be reduced and clarified in the final decision.

a. Standard 2(c):

i. The exception for "de minimis use for local community purposes" logging of old-growth trees is too vague and should be more narrowly defined. As currently written, it allows breadth that could include commercial logging. If it is intended for very small scale use by local communities of downed wood gathering, that should be specified.

ii. Standard 2(c)(vi): The exception outlined here for where the amendment is "not relevant or beneficial to a particular species or forest ecosystem type" is too vague, opaque, and potentially subject to abuse. If a particular species or forest ecosystem type would not benefit from or is not applicable to old-growth forest protection, it would already not be applicable under the amendment. This exception should be removed.

b. Incidental Cutting: Considering the high ecological and social values, rarity, and time it takes for old-growth stands to develop, retaining old-growth forest should not be deprioritized in the face of other activities. Instead, activities that would require cutting old-growth trees should be redesigned to avoid this. The final policy should include only permitting incidental cutting in old-growth forests after environmental review has determined that there is no other reasonable way to design activities that would avoid impacting these forests in such a way. Additionally, any incidental cutting should not result in commercial exchange of trees or relate to performance measures of personnel. Existing old-growth areas should be protected and prioritized within the multiple uses of national forest lands.

In addition to these revisions of Standards, the final decision should revise the sections regarding the Tongass National Forest to more clearly define robust protections from commercial logging in this area, which is our largest area of intact old-growth temperate forest in the world. The Tongass should not be excluded from any policy restricting commercial harvest in old-growth areas.

The DEIS contained several statements that misrepresent the conclusions surrounding the effects and impacts of the Alternatives:

1. The stated conclusion that within Alternative 3 the "rate of restoration would be the slowest under this alternative because the agency's ability to restore old-growth resilience and achieve desired conditions would be more limited with the removal of commercial harvest as a management tool," does not accurately account for the ability for forests to restore their own old-growth conditions through time without the influence of active management and focuses too heavily on a rate of restoration rather than quality or negative impacts and byproducts. This analysis also reduces the restoration of old-growth conditions to tree sizes, ignoring the

complexities of the soil, groundcover, fungal, and epiphytic communities that are present within old-growth forests but cannot be restored actively and actually would be degraded through commercial tree harvesting.

2. Within Social, Cultural, and Economic Conditions, the statement "The lack of large log milling may hinder restoration and other vegetation management activities to improve ecological conditions in or near old-growth forests, creating some uncertainty whether the lack of capacity for large log milling may exacerbate ecological risk" assumes that trees must be milled and sold to improve ecological conditions, when standing dead and downed wood is an essential condition of many old-growth forest types. In particular, moist forest conditions would be irrevocably harmed by logging in these systems, and in particular, logging that would remove large trees. The Amendment policies should not create additional market incentives for logging within old-growth forests.

3. The Outdoor Tourism and Recreation benefits of old-growth forests were not adequately represented as a factor in how logging or proactive stewardship may affect social, cultural, and economic conditions of the DEIS.

Currently, multiple documents closely tied to and referenced within the DEIS are not subject to public and Tribal input or review, including the "Adaptive Strategy for Old-Growth Forest Conservation" and "Technical Guidance for Standardized Silvicultural Prescriptions for Managing Old-Growth Forests." Because these documents directly shape the management and recruitment of old-growth forests, these documents should be subject to public comment and Tribal consultation.

Technical Guidance for Standardized Silvicultural Prescriptions for Managing Old-Growth Forests (Technical Guidance herein):

1. When desired old-growth forest conditions are already met, the Technical Guidance should always prioritize the option of no treatment, not just deferred treatment. It is likely that treatment may never be needed but that is not currently represented in the flowchart. "Treatment may be deferred" should read "Treatment should be deferred" or "Treatment is not necessary" or "Monitor forest conditions". Passive management and monitoring should always be available and preferred considering how natural disturbances and forces can alter these forests at any point.

2. Stand-replacing disturbances are already naturally occurring and don't need to be included as a silvicultural option in old-growth forests. In particular, the flowchart on p. 6 clearly permits stand replacement treatments (clearcuts/seed tree) to occur if treatments are determined to be needed but unlikely to put the stand on trajectory to meet the desired condition. Desired Conditions should not be overly prescriptive, as we don't know how forests will be changing and adapting naturally into the future.

3. Additionally, this same issue is echoed in the section "Diagnosis of Old-Growth Treatment Needs"

The proposed Adaptive Strategy for Old-Growth Forest Conservation that identifies areas prioritized for old-growth retention and promotion is a necessary foresight for this policy. Because of the history of logging across public forest lands, the recruitment of more old-growth forests is needed and we urge the agency to create meaningful and concrete pathways that protect more mature forests from logging, which is one threat to older forests that remains wholly under the USFS's control. As it is currently described, the Adaptive Strategy for Old-Growth Forest Conservation lacks of any measurable goals regarding maintaining or recruiting old-growth There is no evidence that the amendment proposal or the future Adaptive Strategies will direct the land management plans to develop any specific, enforceable, and measurable target metrics for retaining old-growth or recruiting future old-growth and leave large vulnerabilities for existing old-growth forests to be lost. Additionally, targets for old-growth forests should consider landscape level representation of forest age, not just those represented on

national forest lands. Human-created disturbance is frequent across private forest lands but opportunities for sustaining old-growth is not. In particular, very little old-growth forest is left on federal lands east of the 100th meridian, which elevates the importance of protecting more areas of mature forests to a similar level outlined in the amendments. The USFS has the opportunity to be the national leader in old-growth forest retention and recruitment.

Finally, I urge the Forest Service to maintain the timeline to the amendment process. Thank you for the opportunity to provide input on this critical effort being developed for our national forests.

For the Forests,

Sarah Adloo, Ph.D.