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USDA Forest Service

Washington, D.C.

<https://cara.fs2c.usda.gov/Public/CommentInput?Project=65356>

re: DEIS, National Old Growth Amendment #65356

Dear USFS decision-makers,

I would urge the USFS to adopt and strengthen Alt 3, which would expand one of the standards to say: "Proactive stewardship in old-growth forests shall not result in commercial timber harvest." Anything else flies in the face of President Biden's 2022 executive order that requires the Forest Service to, among other things, "develop . . . conservation strategies that address threats to mature and old-growth forests on Federal lands."

Back in the 1980's, a retired forest biologist for a Region 1 national forest took a few of us out into the woods and taught us about old growth. She actually was lumping old growth and mature stands together as most of the mature stands have the basic characteristics of old growth. That day on the ground was eye-opening. The FS had proposed a logging program for that area. The project was stopped for the FS's failure, at the time, to recognize the breadth of values, in that case, the dependence of several threatened and endangered species of wildlife and plants. It brings to mind the old adage of not being able to see the forest for the trees.

I trust the Forest Service, as they move forward in this process, will not forget to look holistically at the forest and not just at using chainsaw medicine to pretend to make the forest healthy. Let me cover a few specifics I have gleaned.

Fire

It is past time for the USFS to use fire as an excuse to expand the timber program. I am afraid that what I read in and of this Old Growth DEIS still emphasizes this growing problem of USFS management.

An issue at which I am at loggerheads (bad pun) with the Wallowa-Whitman NF over is the mostly false premise that fire can be slowed or stopped by heavy thinning and logging. This summer there was an initially unstoppable fire on the forest that raced across a major drainage where 2 homes were lost, up the slope and across the higher hilly/plateau country and on to the edge of the proposed WWNF fire mitigation project [hellip] where it slowed considerably and became easier to handle. The exact opposite of what the USFS is saying. The speed and rapid spread of the fire was because it was mostly burning in open grasslands and sagebrush, and some previously logged areas with very few large stands of timber. It was the actual 'forest' that slowed the fire.

It is now common that logging, thinning and other vegetative management fail to slow the fires at all. There is a growing body of evidence to prove that - called the aftermath of the fires. The USFS is failing the public by failing to incorporate what is learned from climate-driven, high intensity fires.

It is critical that the USFS incorporate the actual 'facts' of how forest operate naturally, which has been honed by Mother Nature over eons of evolution. 'Management' by privateers, states, etc., not just the USFS, has pretty much been a failure.

The work of scientists like Dr. Jack Cohen, a retired USFS fire scientist with years of experience, should be given far more attention. There would have been a whole heck of a lot less damage from fire in the last 20 or so years if that had been the case. The National Fire Protection Association's Firewise work emphasizes that to protect homes and buildings in the WUI zone, you start at the building and work out. Any other efforts are nearly moot for home and building protection. Logging under the false flag of fire mitigation and prevention just plain is irresponsible management. You and I both know there is a long string of devastating, high severity fires that flew right through heavily logged and manipulated forest lands and burned homes. Paradise, CA, scorched by the Dixie Fire is the classic, ugly example of the truth. There are countless other examples.

As most honest scientists know, logging actually exacerbates the current problems we have with climate driven high intensity fires. It changes mesic forests to xeric landscapes that do the opposite of what the USFS is telling the public. That is just an inescapable fact.

I worked as a seasonal on the Bitterroot NF for a number of years. Crews I was on did extensive project work in the heavily logged and roaded areas on the eastern part of the Sula RD. Extensive logging had been done to create linear fire breaks for countless miles along roads throughout a very large area. (Understandably, everyone was wary after the Sleeping Child and Saddle Mountain fires in the area when I was a kid.) When major fire struck in the late 90's, FS daily mapping for the overhead team of fire spread/intensity showed logged over areas burned hotter & faster than unlogged forest. I know that because the FS person doing the GIS mapping was a good friend and shared with me the maps and data, knowing that I knew that country extremely well. Uniquely, the area in which the fire burned slowest was within the Anaconda Pintlar Wilderness. Just another example that the USFS should have learned from, but chose to ignore.

The FEIS must address the misconception that logging and thinning will save our national forests. It must address the facts of the changes in the fire scenario we now face and put the primary efforts for fire mitigation where it belongs: in the wildland-urban interface and start at the home, then moving outwards. Logging most any forest land, especially mature and old growth forests miles away from homes has proven to be a failed policy, probably politically driven.

As an example, back in 1988 when I was working on the Nez Perce NF as a seasonal, there were two articles that were side by side in The Missoulian (Missoula, MT, newspaper). One was about the growing problem of science ignorance, especially amongst teachers as I remember. The other article was that expression of said science ignorance by members of the Montana and Wyoming congressional delegation spewing pandering rhetoric about the failures of the USFS and the NPS (the Yellowstone fires) for failing to stop the fires.

Threatened and Endangered Species

A significant failure of the USFS's preferred alternative is that it continues the historic threat of 'over-management' of our national forests which impact, sometimes heavily, ESA-listed threatened and endangered species. I have been involved with wildlife federations and associations pretty much since I was a member of the Ranger Rick club of the National Wildlife Federation as a child.

Where we live today, for instance, we are seeing less and less pileated woodpeckers. It could be lots of things, but I suspect it is the private (and some FS) logging of the mature forests that start a short hike from our home. I have not seen or heard a pileated since last spring. I hear logging trucks daily coming off of the private lands interspersed with national forest lands behind us. We like the pileated's better.

Pileated woodpecker populations have both declined due to logging activity as well as the widespread habitat destruction, often called 'management' of mature and old growth forests.

In the Custer-Gallatin NF, I had a pine marten scurrying about a campsite in a wonderful, mature area of the forest. What a treat. But the modern USFS concept of forest manipulation to achieve a healthy forest eliminates the very habitat these little critters need. And that is unconscionable. This National Old Growth Amendment must bend over backwards to protect this habitat. The preferred alternative does not, I am afraid.

I am not a botanist, but many others I am sure are laying out those concerns well. When I had a fall job one year doing timber stand exams for the Custer-Gallatin, the contract called for doing TSE's in whitebark pine. That is another disappointing case of the USFS not seeing the forest for the trees. It was an amazing stand. Not only should we not have been working in there, but the FS plan for the area should have set up a sound buffer around the area to help protect the whitebark. Now it is a listed species.

Other mature and old growth favoring species I am familiar with are the grizzly bear and the wolverine. I have had both in backcountry camps, though with a little more trepidation on my part than when Mr Pine Marten visited.

Wildlife Security Habitat

For years, back on the Gallatin NF, we wildlife advocates were constantly trying to get the USFS to recognize the sound science of the need for wildlife security habitat. Whether to seek security cover, hunker in the mesic Doug fir (old growth and mature forest types) in the heat of the summer, or seek thermal cover in the winter, elk, deer and other ungulates require mature and old growth habitat to meet especially the latter two needs.

A group of wildlife biologists in Montana, in the '80's, issued a study on road density issues as it relates to the needs of elk. The USFS somehow always managed to downplay sound science to get the cut out. I no longer have a copy of the Elk Logging Study, but its conclusions were that the land managers needed to reduce existing roads where the density was high, and not continue to build more roads.

Since then, Dr. Scott McCorquodale, a wildlife research scientist with the Washington Department of Fish and Wildlife, wrote a paper 'A Brief Review of the Scientific Literature on Elk, Roads, & Traffic' by is one paper that delves into the significant problem with roads and ungulates. Pretty much just a newer version of the Elk Logging Study of the 80's, saying much the same thing.

The McCorquodale paper notes that as road densities increased above 2 miles of open roads per square mile, habitat effectiveness - the percent of expected use - declined rapidly with a loss of habitat effectiveness ranging between 55-80%.

Roads, logging and most so-called management programs the USFS do today defeat the needs of wildlife. The USFS must recognize that road density must include any closed road that has not been ripped out enough to preclude motorized use. Where we live now, on the Wallowa-Whitman NF, I have seen nearly no 'closed' roads that are not traveled by motorized vehicles. Even the FS admits it is a problem (though I doubt they would put it in writing). In less than an hour I can get to 'closed' roads that even 4x4 trucks are using, not just motorcycles and OHV's. There is exactly zero enforcement.

The latest fire mitigation project, mentioned above, on the WWNF talks of opening up the area for elk to graze. I guess the biologists for the FS failed to actually walk the area. There is plenty of open ground for grazing, so that is not even an issue but a poor excuse to log. Again, disappointing and unconscionable. The greatest benefit to wildlife in this project area would be to rip out the existing 'closed' roads that are now well used by motorized users, and not build any new ones. The existing road density in the area is very high. It is disingenuous for the USFS to claim this project will enhance elk habitat.

Virtually no management program of the USFS in the last many years has honestly addressed those needs. This DEIS also fails to adequately address the issue. That must be rectified in the FEIS.

As I remember, the Montana Elk Logging Study recommended no more than a mile of road per square mile to retain existing habitat effectiveness. The areas they were addressing had some of the healthiest populations of elk in the nation, and probably still do.

When we are dealing with an important part of our natural biosystem, wildlife, land managers should be erring on the side of caution to minimize the impact of any project on the wildlife. This proposed amendment is no exception.

Intent of Old Growth Protection

In 2022, President Joe Biden issued an executive order that required the USFS to, among other things, "develop . . . conservation strategies that address threats to mature and old-growth forests on Federal lands."

The USFS (and the Bureau of Land Management) prepared an inventory of mature and old-growth (MOG) forests. Like a lot of national environmental analyses, such as RARE I and RARE II, it is far too general. There must be sound direction in the DEIS to each National Forest to follow through with a scientifically sound completion of this inventory as their planning processes move forward.

Studies by Oregon State University, I believe it was, show that mature and old-growth trees and forests help protect our climate by absorbing and storing carbon, boost resilience to fire, help regulate temperatures, filter drinking water and shelter wildlife.

After the inventory, the Analysis of Threats document the USFS (and BLM?) released on threats to MOG forests that somehow found that logging by the agencies is not a significant threat. Rather, MOG forests are threatened mostly by too much fire, not enough fire, insects and disease, extreme weather events, and/or climate change. This, of course, misses the reality on the ground. Logging and other forest manipulation is surely the greatest threat as seen by the history of USFS decision-making in the last number of decades.

For the USFS to say that "the lack of large log milling may hinder restoration and other vegetation management activities to improve ecological conditions in or near old-growth forests" is proof in the pudding that there is a serious lack of the recognition of sound science within USFS decision-making. I would urge the agency clearly correct this in the DEIS.

The preferred alternative clearly does not meet the basic intention of President Biden's executive order.

Summation

The proposed amendment is intended to provide a consistent management framework to conserve and steward old-growth forests in response to rapidly changing climate conditions and other threats such as wildfire, insect and disease.

I would urge the USFS to significantly strengthen the final record of decision to ensure meaningful protections for the nation's remaining old growth and all mature forests. It is a good opportunity to lay the foundation to increase the abundance and distribution of mature and old growth for future generations.

The preferred alternative in the DEIS allows forest managers to do the bare minimum to preserve old-growth forests and creates loopholes that could lead to the continued or even increased logging of old-growth trees. Here in Oregon, we regularly see mature and old-growth trees targeted for commercial logging. Logging old-growth trees to save stands from potential threats is just plain poor management.

I urge the adoption and expansion of Alternative 3. It must be expanded to create meaningful standard to meet the existing statement: "Proactive stewardship in old-growth forests shall not result in commercial timber harvest."

I would strongly suggest that the FEIS and Record of Decision:

- a) Eliminate exceptions and end all logging of old-growth trees in National Forests.
- b) Prohibit sending old-growth trees to the timber mills. The economic incentive for logging old-growth must be removed. If the logged tree cannot be sold or exchanged, it will likely prevent all but truly rare removals of old-growth trees.
- c) Include durable protections for mature trees and stands. This is paramount to the future of old-growth. Mature forests and trees - future old growth - must be protected from the threat of commercial logging in order to recover old growth that has been lost to past mismanagement.
- d) Be consistent with the need to address the real danger of wildfire as discussed above. Protecting older trees and forests can increase forest resilience to wildfires, and may help slow climate-change related impacts such as

flooding and drought.

Mature and old-growth forests may play in fighting the climate and biodiversity crises. The USFS must establish meaningful safeguards for the conservation of these forest lands. Failure to do so undermines the objectives of this amendment, contravenes the direction of EO 14072, and ignores more than half a million public comments the agency received on last summer's advance notice of proposed rulemaking.

Thank you for your time. Please be sure to include these comments in the record.

Sincerely,

Richard R Meis