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Comments: To: Director of Forest Management, USDA Forest Service

Please open the attached comments regarding the draft environmental impact statement on Old Growth.

September 16, 2024 Submitting Comments: Land Management Plan direction Across the National Forest System Subject: Comments on Old Growth Draft Environmental Assessment To: Director of Ecosystem Management- Forest Management Associated California Loggers (ACL) is a non-profit trade association with 500 members that employ over 5000 people whose livelihood depend on sustainably managed forests. In addition, ACL, relies on the support of heavy equipment and parts industry, employing fuel suppliers that Founded in 1973, ACL members have extensive, forestry and natural resource educations, experience, and generational knowledge of the forests of California. On behalf of ACL membership, we are pleased to submit comments on the Draft Environmental Impact Statement protecting and sustaining our nation's old growth trees stands. ACL's comments will be focused on the nations western forest in Arizona, California, Colorado, Idaho, New Mexico, Oregon, Washington and Utah. These states, while separated by geopolitical boundaries have similar forest biomes that should be analyzed differently, rather than a broadstroke that does not meet the needs of these forest systems, but rather should be separated to define old growth more specifically based on a different set of criteria and active management policy to prevent their loss. ACL believes there are a host of reasons these old growth tree stands need to be sustained. Chief among and the number one reason to allow active management is the risk of loss from uncontrolled catastrophic fire, insects, rot diseases, and other atmospheric climate changes. Put plain and simple, we need to actively manage these forests to allow intervention to protect and sustain their existence far into the future. It is no surprise that the decades of decisions over the past 40 years to drastically reduce forest management activities have resulted in the loss of old growth trees to catastrophic mega forest fires. Designating hundreds of thousands of old growth tree stands for endangered and threatened species such as the Northern Spotted Owl (NSO), *Strix occidentalis caurina* and the soon to be listed California Spotted Owl (CSO), *Strix occidentalis occidentalis* habitat since 1994 from active management on our public lands have left our national forests in a state of decline in our western forests. The New Mexico Spotted Owl, *Strix occidentalis lucida* is also listed as a threatened and endangered owl which ranges into Arizona and Colorado. These forest biomes are suffering the same fate. Decades of declining national forest's health translates to the suffering of the health of humans, in terms of the air we breathe, the water we drink, and the carbon emitted into our atmosphere vs the carbon sequestered in our forests and the wood products derived from active forest management. The Environmental Protection Agency estimated that carbon emissions from wildfires in the United States increased by more than seven-fold between 2005 to 2018, from 20.5 million metric tons per year to 141.1 million metric tons per year.¹ The Forest Service's effectiveness in achieving climate resilience and perpetuating mature old forests requires immediate action to increase the acres treated using active forest management practices. Mechanical Treatments and Prescribed Burning The efficacy of mechanical treatments coupled with prescribed burning in the nation's forests has been proven repeatedly. Most of the National Forest System (NFS) lands west of the 100th Meridian should focus their work on reducing stand densities in frequent fire return interval forests, while creating age class diversity in forests adapted to less frequent fires. Malcolm North and other researchers found that most fire prone Western forests have seen tree densities "increased by six to seven-fold while the average tree size was reduced by 50%." This prevalence of overstocked stands, North says, "suggest that treatments for restoring forest resilience may need to be much more intensive than the current focus on fuels reduction."² In other words, in fire adapted forests in the West (which occur preponderantly on the NFS), the chief strategy that should be employed is widespread

use of heavy thinning to reduce forest stand densities. Aerial and ground imagery shows wildfires burn less intensely in treated areas. In some cases, the low density of ground and ladder fuels in thinned areas made them function as a fire break, with no burning happening in the thinned area.³ This also aided in the containment of wildfires by firefighters. To reduce carbon emissions and increase sequestration the Forest Service should move aggressively to active forest management activities aimed to protect old growth trees and reforest unreserved National Forest System lands that have been damaged or destroyed in catastrophic fires. ACL cites Title 16 - Conservation [sect] 1611. Timber (a) Limitations on removal; variations in allowable sale quantity; public participation The Secretary of Agriculture shall limit the sale of timber from each national forest to a quantity equal to or less than a quantity which can be removed from such forest annually in perpetuity on a sustained-yield basis: Provided, That, in order to meet overall multiple-use objectives, the Secretary may establish an allowable sale quantity for any decade which departs from the projected long-term average sale quantity that would otherwise be established: Provided further, That any such planned departure must be consistent with the multiple-use management objectives of the land management plan. Plans for variations in the allowable sale quantity must be made with public participation as required by section 1604(d) of this title. In addition, under subsection (b) Salvage harvesting Nothing in subsection (a) of this section shall prohibit the Secretary from salvage or sanitation harvesting of timber stands within any decade, which are substantially damaged by fire, windthrow, or other catastrophe, or which are in imminent danger from insect or disease attack. ACL recommends a serious look at the provisions in the National Forest Management Act (NFMA) and the subsequent amendments after enactment in 1976. The USFS has not been compliant. Over the past 40 years, the agency has shifted away from the spirit and purpose of the law. That is to manage our National Forest on a sustained yield for goods and services for the greater good, for the greatest number, over the long term in perpetuity. We urge you to consider not setting aside additional areas that limit sustainable forest actions aimed at keeping our forests healthy and communities that rely on forests for economic growth. The first sentence of Title 16 is important to highlight. The departure from this has largely resulted in the destruction of millions of acres of the National Forest and therefore the loss of old growth. The loss of habitat is alarming. For example, in the Eldorado National Forest, the 2021 Caldor Fire resulted in the loss of thirty protected activity centers for the California spotted owl. Loss of owl habitat is a common occurrence duplicated throughout California Region 5 forests over the past three decades due to catastrophic mega forest fires. What is more alarming, the complete destruction of entire rural towns and communities resulted in the loss of life and property. ACL "You Have to Cut Trees to Save Trees" Solution: Analyze a coherent approach to the above question and theme, by overlaying the mature old forest layer with the fire shed analysis then create a network of defensible fuel profile zones adjacent to mature old forest stands; assess stocking levels of existing mature forest stands and prioritize treatments to reduce stocking levels. The Forest Service found in the Mature and Old Growth Inventory⁴ that 13.4 million Acres of "Old Growth" on National Forest System lands was already in Congressionally designated Wilderness areas, more than 54 percent of the total old growth. Similarly, 25.6 million acres of "mature" forests were in these restricted land use areas (38 percent of the total). Outside of these already restricted land areas, the Forest Service should actively manage all mature and old growth forests to ensure that they remain resilient to current and future conditions. For some species, this includes using regeneration harvest to recreate desired forest types - such as Jack Pine, Aspen, and several different types of hardwood species that do not regenerate without canopy removal. The literature establishing the effectiveness of management - particularly thinning in fire prone stands - is voluminous⁵. Just because the dominant trees in a stand are very old for a particular forest type does not mean that the correct management approach is to cease all management and timber removal from that stand. Some forest types, like Lodgepole Pine, Jack Pine, Douglas Fir, and Aspen are adapted to significant disturbances that frequently result in mineral seed beds or root suckering, which fosters regeneration. The most effective strategy to "maintain" older forests of these types would be through periodic cutting to ensure age class diversity, with different stands maturing at different times. In forest types that are adapted to more frequent fires, thinning should be used to maintain appropriate stand densities, followed by enough regeneration harvest to ensure age class diversity over time. Just because the dominant trees in a stand have reached or are approaching the age classes identified in the regional definitions of old growth does not mean that the best way to conserve that stand is to leave it choked with uncharacteristically high basal area, made up in part by trees which do not contribute to overall resilience. Given that the Mature and Old Growth Inventory found thirty-nine million acres of mature and old growth forests

on National Forest System Wilderness, Roadless, and National Monument areas strongly suggests that these types of ecosystems are already well distributed across the landscape. In fact, when incorporating lands managed by the Department of the Interior's Bureau of Land Management, there are over 112 million acres of mature and old growth forest, over 175,000 square miles. This is an area larger than all but three states, and is larger than the states of West Virginia, Maryland, Vermont, New Hampshire, Massachusetts, New Jersey, Hawaii, Connecticut, Delaware, and Rhode Island combined. It is important to note that these impressive acreages of old growth and mature forests were found based on a review of less than 20 percent of total forest area of the United States (notably, the review pointedly did not include any analysis of the millions of acres of forests found in the National Park System, which is not open to commercial timber harvest). It is not clear at all that Congress has established that the "challenge" before the Forest Service is to "maintain and grow older forest conditions while improving and expanding their distribution." The agency should incorporate conservation (not preservation, which has proven ineffective) of mature and old growth forests into existing forest plans, in concert with the other legally binding statutory mandates which remain in effect. Stand densities in set aside areas need to be reduced to protect the vegetation that provides the habitat for threatened or endangered species it relies on for survival. If we fail to do this, the consequences will eventually be catastrophic from a mega fire event that destroys all species within a set-aside area. We should not allow this to occur. Not putting any additional mature or old growth forests on National Forest System lands into no management status - Wilderness, Roadless, or National Monument - would be a good start. As noted, over 39 million acres of Mature and Old Growth is already located in unmanaged areas. Reserved forests in the Northwest and in California do not seem to be exhibiting "ecosystem resilience to climate change." Rather, they are experiencing high levels of forest mortality, large scale wildfires (with significant associated carbon emissions), and widespread conversion to nonforest. There is evidence that set-asides or reservation from management is not an effective "adaptation practice" for both "mature and old growth" forests and certain wildlife species. As Steel et. al. has found⁶, "Recent disturbance trends in western forests create a test" of the assumptions behind a static approach to habitat conservation in disturbance-prone systems. "Results from the Pacific Northwest suggest that in dynamic, disturbance-dependent forests, this assumption is not well supported[hellip]" and that "Under climate change, a static approach to mature forest conservation may be even less effective in drier and warmer regions such as the southern Sierra Nevada." Steel et. al. also found that over the course of just one decade, "50% of moderate or high-density mature forest habitat saw canopy cover decline below 40% constituting a transition to lower density forest (22% of the original extent) or non-forest vegetation (28% of the original extent). Within the mature forest classification, higher density areas experienced more extensive declines, with 85% of this subclass falling below the 60% canopy cover definition of high density."⁷ We've witnessed significant mortality and forest loss in areas where set asides have been the primary "conservation" strategy. Given this "strategy's" proven ineffectiveness, it would be unwise to expand its use. The Northwest Forest Plan (NWFP) 25-year Monitoring Report on late-successional and old-growth trends concluded that "wildfire remained the leading cause for older forest losses on federal lands, accounting for about 70 percent of all losses since 1993. ACL urges you to review this important report. It cannot be dismissed, therefore must be reconsidered. A study out of the University of California-Berkeley confirms that prescribed burning, the use of controlled fire to clear debris; restoration thinning, in which slow-growing or damaged trees are removed to make space for others; or a combination of both strategies effectively reduce the risk of catastrophic wildfire while also improving forest health, according to a release.⁸ How might the Forest Service better support diversified forest economies to help make forest dependent communities more resilient to changing economic and ecological conditions? The best way for the Forest Service to incentivize economic development, diversification, and strengthening communities is through a reliable and growing supply of wood fiber to meet the needs of existing wood products facilities, but importantly the needs of the American People. As we noted above, the National Forest System is not currently functioning this way: We've seen multiple mill closures even during periods of record-breaking prices for commercial wood products. Congress has given the Forest Service unprecedented new authorities (Farm Bill CE's, permanent Stewardship Contracting Authority, expanded Good Neighbor Authority) and funding streams (Great American Outdoors Act funding for facilities, roads, and trails maintenance, permanent mandatory funding for land acquisition through the Land & Water Conservation Fund). The Infrastructure and Inflation Reduction Acts provided the Forest Service with roughly \$7 billion for fuels reduction, forest thinning, and the creation of fuel breaks. The Forest Service has between three

and five years remaining with those pots of available funding, and yet we have seen the agency select areas as "priority fire sheds" that have little to no forest management capacity: The individual forests sometimes have few if any timber staff, with limited experience in planning or administering timber sales. In many cases there are few (if any) outlets for wood fiber, and little to no logging or trucking capacity. Instead of allocating resources to forests with fuels reduction needs AND management capacity, the Forest Service has instead opted to use other criteria and to allocate resources to regions with limited prospects for success. The Forest Service should direct all remaining funds from the remaining Infrastructure and Inflation Reduction Act to Forests that have internal management capacity, capable external partners, and functioning wood supply chains, they will bolster the resilience of neighboring communities while generating revenue from commercial timber sales to extend non-commercial

work onto additional acres. There are considerable amounts of work to be done on the roaded land base of the National Forest System. The Associated California Loggers (boots on the ground) and forest products industry want to partner with the Forest Service to accomplish this much needed work. We have made serious investments in technology and state-of-the-art low impact equipment. Let us work together to save our treasured National Forest Lands with a sensible collaborative approach. ACL is recommending for the integration of actively managed, selective logging and fuels management practices in and around old-growth forests in alignment with the National Forest Management Act. This action is imperative to address the multifaceted impacts stemming from the absence of natural fire cycles, reduced logging activities, closure of 75% of California mills since the 1980s, and the effects of climate change-induced drought on forest health. The transition away from active forest management has resulted in profound and lasting consequences for both our forests and the rural communities reliant on them. The decrease in logging activities and the absence of natural fire cycles have rendered our forests increasingly susceptible to catastrophic wildfires, leading to extensive depletion of old-growth forest areas and significant loss of vital wildlife habitat. Furthermore, the cessation of mill operations has drastically impacted the rural communities that depend on the forest industry for their economic livelihoods, leading to economic hardship and a shift towards tourism-based economies. This has eroded the resilience of these communities in the face of natural disasters like the Rim Fire, Caldor Fire, Dixie Fire, and King Fire, to mention a few. The Forest Service's planning and comment period after these fires results in no work being completed after these fires resulting in a massive economic loss as well as a forest that will never be close to being restored in our grandchildren's lifetime. It is of utmost importance to address these challenges through a holistic approach that encompasses selective logging in and around old-growth forests. By adopting science-based, active forest management practices, we can mitigate the risk of catastrophic wildfires, enhance overall forest health, and support the long-term sustainability of rural communities dependent on the forest industry. I urge the agency to thoroughly consider the significance of integrating selective logging as part of the solution to the challenges faced by our forests and rural communities. It is crucial to strike a balance that protects old-growth forests, while also fostering forest health and resilience. Our national forests are being hijacked by self-serving politicians and extreme activists. Stop this amendment from the outcome of applying political demagoguery to forest management. Politically Driven Nationwide Old Growth Amendment Fails to Address Primary Threats to Old Forests, Harms Efforts to Address Wildfire Crisis. To consider as the current administration's approach with this broad stroke approach to amend all 128 national forest plans is frankly a bad idea. Solution: ACL recommends the Forest Service should focus on implementing effective strategies that are guided by local Forest Plans and informed by science, public input, and on-the-ground conditions. In conclusion, ACL members represent a large segment of rural communities working class, loggers, woods workers, truckers, farmers, cattle ranchers, and variety of support industries. Our communities are at risk from large landscape catastrophic forest and wildland fires. We expect a thorough revision of the DEIS that considers a "bottom-up strategy". In other words, a centralized forest management system with an analysis covering all 128 National Forest is a recipe for failure. Revisions or individual forest plan amendments covering small geographic areas would allow detailed local involvement. This is the way forward to protecting and sustaining old growth trees. ACL looks forward to your consideration of our comments. Respectfully, Russ Hawkins President Associated California Loggers Eric Carleson Executive Director, Associated California Loggers 1 Inventory of U.S. Greenhouse Gas Emissions and Sinks 1990-2018 U.S. Environmental Protection Agency April 2020 2 Operational Resilience in Western US Fire Prone Forests Malcolm P. North et. al Forest Ecology and Management Volume

507, 1 March 2022, 1200043 healthyforests. (n.d.). Logging and Thinning Helps Reduce Wildfire Risks - Healthy Forests, Healthy Communities.<https://healthyforests.org/2021/07/logging-and-thinning-helps-reduce-wildfire-risks/>4 Old-Growth and Mature Forest: Definition, Identification, and Initial Inventory on BLM and Forest Service LandsFulfillment of Executive Order 14072 Section 2(b); USDA Forest Service (2023)5 See, for instance: M.T. Stoddard, et. al.; Forest Management & Ecology 493 (2021); Forest Service Rocky MountainResearch Station Bulletin No. 59, (2023); S.J.Prichard et. al Ecological Applications, vol. 30, no. 5 (2020); T.B. Jain et.al.; Forest Science, vol. 66, no. 2 (2020), among many, many others.6 Mega-disturbances cause rapid decline of mature conifer forest habitat in California Z.L. Steel, et. al.; EcologicalApplications December 20227 Davis, Raymond J. et al., Northwest Forest Plan[mdash]The First 25 Years (1994-2018): Status and Trends of NorthernSpotted Owl Habitats (2022). Pacific Northwest Research Station, General Technical Report PNW-GTR-1003.8[https://www.bing.com/ck/a?!&&p=09f6b98d47077ca7JmItldHM9MTcwNjQwMDAwMCZpZ3VpZD0xYjk2YzdkYy0wMGl1LTYNdItMDVmMS1kNmYwMDEZZDY4NDImaW5zaWQ9NTlwMg&ptn=3&ver=2&hsh=3&fclid=1b96c7dc-00b5-6942-05f1-d6f0013d6842&psq=Berkeley+prescribed+burning+and+thinning+study.+&u=a1aHR0cHM6Ly9uZXdzLmJlcmtlbGV5LmVk dS8yMDIzLzEyLzEyLzR3R3ZW50eS15ZW FyLXN0dWR5LWNvb mZpcmlzLWNhbGlmb3JuaWEtZm9yZXN0cy1hcmUtaGVhbHROaWVvYXN0dWR5LXRoZW5uZWQ9&ntb=1ATTACHMENT:](https://www.bing.com/ck/a?!&&p=09f6b98d47077ca7JmItldHM9MTcwNjQwMDAwMCZpZ3VpZD0xYjk2YzdkYy0wMGl1LTYNdItMDVmMS1kNmYwMDEZZDY4NDImaW5zaWQ9NTlwMg&ptn=3&ver=2&hsh=3&fclid=1b96c7dc-00b5-6942-05f1-d6f0013d6842&psq=Berkeley+prescribed+burning+and+thinning+study.+&u=a1aHR0cHM6Ly9uZXdzLmJlcmtlbGV5LmVk dS8yMDIzLzEyLzEyLzR3R3ZW50eS15ZW FyLXN0dWR5LWNvb mZpcmlzLWNhbGlmb3JuaWEtZm9yZXN0cy1hcmUtaGVhbHROaWVvYXN0dWR5LXRoZW5uZWQ9&ntb=1ATTACHMENT: Comments to USFS DEIS Old Growth..pdf)
Comments to USFS DEIS Old Growth..pdf - this is the same content that is coded in text box, it was also included as an attachment