GEORGIA FORESTWATCH

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Region 8 old-growth code	Region 8 old-growth type	Stand age	Stand basal area ($ft^2\ ac^{-1}$)	Large tree diameter (inches)	Dead trees per acre
1	Northern hardwood forest	100	40	14	13
2	Conifer-northern hardwood forest	140	40	20	6
5	Mixed mesophytic and western mesophytic forest	140	40	30	4
6	Coastal plain upland mesic hardwood forest	120	40	24	4
10	Hardwood wetland forest	120	40	20	0
13	River floodplain hardwood forest	100	40	16	0
14	Cypress-tupelo swamp forest	120	40	8	3
21	Dry-mesic oak forest	130	40	20	26
22	Dry and xeric oak forest, woodland, and savanna	90	10	8	10
24	Xeric pine and pine-oak forest and woodland	100	20	10	6
25	Dry and dry-mesic oak-pine forest	120	40	19	15
26	Upland longleaf and south Florida slash pine forest, woodland, and savanna	80	10	16	0
27	Seasonally wet oak-hardwood woodland	100	40	20	0
28	Eastern riverfront forest	100	40	25	6
29	Southern wet pine forest, woodland, and savanna	80	10	9	0
31	Montane and allied spruce and spruce-fir forest	120	40	20	14

You may know that the U.S. Forest Service (USFS) has initiated a process to establish new protections for old growth in national forests. This policy would generally not cover mature forests, and a comment period is currently open until February 2, 2024.

A **preliminary proposal** was recently issued, and the USFS has indicated that it will release a full proposal and draft environmental impact statement (EIS) in May 2024. The current comment period aims to shape the full proposal and draft EIS. After those documents are released in May, USFS will hold an additional 90-day comment period and expects to finalize the policy in January 2025.

Once finalized, the USFS intends to amend all 128 national forest plans to incorporate the new language. If a forest plan already contains more restrictive language than the new policy, the more restrictive language will continue to govern.

Note that the current forest plan for the Chattahoochee-Oconee National Forest (CONF) dates back twenty years to 2004 and is past due for a full revision.

The policy contains several elements with varying degrees of enforceability.

- Mandatory, enforceable standards will allow vegetation management in old-growth forests ***only*** for proactive stewardship to promote the resilience and adaptability of old-growth. USFS has listed 11 ecological rationales that could serve as the foundation for such management. These broad rationales give the agency-wide leeway to justify a project on ecological grounds.

- In addition, there are five exceptions when this protection would not apply (e.g., reducing fuel hazards in the wildland-urban interface (WUI) and culturally significant uses). The fifth exception is especially broad, applying "in cases where it is determined that the direction in this amendment is not relevant or beneficial to a particular forest ecosystem type."

- Economic factors must not be the "primary purpose" of projects in old-growth forests, but there is no prohibition on selling trees when the cutting is justified on ecological grounds. It is ambiguous whether economic factors can be a secondary purpose used to justify management in old growth.

- A management approach calls for each forest unit to draft an *Adaptive Strategy for Old-Growth Forest Conservation* that identifies forest areas to be prioritized for old-growth retention and promotion.
    1. Some mature forest areas may thus be set aside as future old growth.
    2. Areas prioritized for old growth retention and promotion will not necessarily be left undisturbed but may be subject to proactive stewardship.
    3. Each forest unit will have two years after the policy is finalized to develop its *Adaptive Strategy*. They can create a joint strategy with other units or adopt an existing document that meets the strategy's intent.
    4. USFS suggests an *Adaptive Strategy* will *not* be binding or subject to legal challenge.

- A guideline applies to areas that do not currently qualify as old growth but are identified in the *Adaptive Strategy* as a priority for future old growth. It aims to steer proactive stewardship toward increasing the amount, representativeness, redundancy, and connectivity of old-growth conditions. The guideline provides management direction but does not establish any specific protections.

- A unit-level objective strives for at least one landscape prioritized in the *Adaptive Strategy* to show measurable improvement within ten years due to **natural processes** and proactive stewardship.

- Desired conditions are to maintain and improve old-growth conditions over time (relative to existing conditions), including the contribution of old growth to carbon storage and ecological integrity.

- To facilitate plan monitoring, the Chief of the Forest Service will establish a National Old-Growth Monitoring Network to track trends in old-growth conditions. Additional analysis will also be added to monitor individual forest

plans, largely to track how effectively each unit implements its *Adaptive Strategy*.

- A goal is respecting tribal sovereignty, treaties, and Indigenous knowledge and enabling co-stewardship.

During the amendment process, proposed projects within old-growth conditions must be submitted for review and approval by the National Forest System Deputy Chief. This does not entail new substantive standards for projects. It is not yet clear which projects that are already in the pipeline would be covered. The Deputy Chief **has indicated** that specific instructions will come soon.

This policy (and the interim protections) use the same regional definitions of old-growth used in the **Mature and Old-Growth Definitions and Inventory** . As this policy covers only old-growth, it does not contain any definition of "mature." USFS Southern Region 8, which includes the CONF, defines old-growth as each stand that meets or exceeds "*minimum values of live **basal area** (ft2 ac-1; of trees ≥5 in **DBH**), stand age, dead trees density, and have ≥6 trees per acre that met a minimum diameter for a given old-growth community type. Forest types dominated by commonly planted pine species were only considered old growth if they met the appropriate thresholds and were located in a county where the species is known to be native."* Interestingly, some of the white pine plantations GAFW supports logging could potentially be considered old-growth according to the above definition.

GAFW and our partner organizations will use this comment period to urge meaningful protections for old-growth in the amendment and continue to call for a national rule that protects mature and old-growth trees and forests.

Happy New Year

Land management agencies and some politicians have repeatedly told the public and the press that recent lightning fires are a profound threat to iconic Giant Sequoia groves and that only industrial forest management and further wildfire

suppression can save the groves. These claims are being used to advance a dangerous logging bill, deceptively named the "**Save Our Sequoias Act**," that would roll back all major environmental laws to allow lawless logging in all Giant Sequoia groves, even in national parks and Wilderness Areas. The public and the press are being kept out of these groves by "closure orders" issued by land agencies, which restricts our ability to see for ourselves whether the agencies are telling the truth.

Dr. Chad Hanson, forest and fire ecologist with the **John Muir Project** (and a national Board member of the Sierra Club), will present current scientific evidence and explain why these claims are misinformation and how the truth is quite the opposite from what we are being told. For example, far less than 20% of mature sequoias have been killed recently. Giant Sequoias evolved to depend on higher-intensity fire to reproduce effectively and are naturally regenerating by far the best in the larger high-intensity fire patches. We are now seeing Giant Sequoia reproduction, the likes of which no human being has witnessed since the late 1800s, before wildfire suppression policies. In short, recent fires are the salvation of Giant Sequoia groves, not their doom, and the public is being misled.

Register **HERE** to join.

Correction

In the **ForestWatch Journal published on January 3, 2024** , we mistakenly published the incorrect photo of Bachman's warbler. The published image is that of a very similar **Hooded Warbler**. Here is an illustration and more information regarding the still-extinct Bachman's warbler.

GAFW regrets the error and appreciates the feedback from a knowledgeable reader alerting us to this mistake.

Upcoming GAFW Outings & Outreach

Monday, January 15 – **MLK Day of Service Project - Chattahoochee River Clean-up**

Tuesday, January 23 – **Save the Date** - **Outing!** Chattahoochee Nature Center Visit

Thursday, January 25 (New Date!)-- **GAFW Book Club Meeting** , Zoom (*The Lost Book of Eleanor Dare* by Kimberly Brock)

Friday, February 2 – **Len Foote Hike Inn Overnight** - Space is limited!

Have you signed our outing waiver? If not, use this link: **Outing Waiver.**

GAFW Outings on Meetup

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Thank You

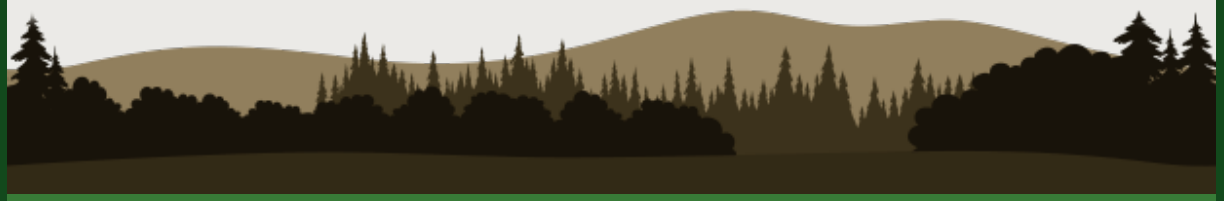
Georgia ForestWatch is the only nonprofit organization with a mission solely dedicated to ensuring the Chattahoochee-Oconee National Forests remain healthy and available for future generations, and we can only pursue our mission with the support of the community.

Please support our mission by ensuring your **membership is up to date** and providing **additional support** as you are able.

On behalf of our entire national forests in our beautiful state, we thank you for your support.

Our Mission

Our mission is to preserve and protect our national forests.



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Georgia Forestwatch | 81 Crown Mtn Place, Building C, Suite 200, Dahlonega, GA 30533

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