



# Old Growth

---

## Eligible Objectors & Interested Persons for this issue:

- Teck Washington, Inc., Pend Oreille Operations
- Washington Cattleman's Association
- Washington Wild
- Sierra Club/Alliance for the Wild Rockies
- Northeast Washington Forest Coalition

## Objections:

- The revised land management plan (LMP) does not recognize old growth for special protection. This contradicts longstanding Forest Service policy (e.g., Colville National Forest's 1988 LMP and final Environmental Impact Statement [FEIS]).
- The Colville National Forest has not maintained a forest-wide old-growth inventory. As a result, forest managers cannot, as proposed in the revised LMP, use an inventory to monitor (1) management indicator species (MIS) associated with old-growth habitat or (2) old-growth and cavity dependent species to assure those populations aren't trending toward extirpation. Since there is no monitoring of old-growth areas, these areas also cannot act as valid habitat proxies.
- The Colville National Forest has conducted no research or monitoring comparing pre- and post-logging old growth occupancy by or abundance of wildlife species with strong biological associations with old growth. It is therefore unclear whether logged old-growth still provides functional habitat for these species.
- The revised LMP and FEIS do not address how fragmentation, road effects, and past logging in old-growth areas have impacted wildlife habitat.
- The revised LMP fails to substantiate the claims (through scientific evidence) that development of old-growth characteristics can be accelerated.
- The revised LMP does not include scientifically sound management direction for maintaining structure, function, and composition of the forest, and the FEIS does not present an adequate analysis of the structure, function, and composition of the forest. This violates a requirement of the 2012 Planning Rule.
- The FEIS fails to consider the impacts from industrial management activities on the forest's mycorrhizal network, and the revised LMP does not acknowledge these organisms and their processes.
- The revised LMP weakens protection of old growth, late successional forests and Eastside Screens, which (especially in contiguous, roadless areas) provide critical habitat for a range of Threatened and Endangered Species and Species of Conservation Concern.
  - The final Alternative P leaves significant exceptions to cutting old/large trees.
  - The revised LMP's management strategy undermines recommendations of the Eastside Forests Scientific Society Panel.
  - The revised LMP lacks an accurate baseline of old growth stands and there has been inadequate monitoring of the revised LMP's impacts on old growth.
  - Since the revised LMP fails to provide detailed standards and guidelines for protecting (1) old growth habitat to "insure" wildlife viability and (2) wildlife



# Silviculture

---

diversity, the revised LMP violates the National Forest Management Act's (NFMA's) viability requirement and the National Environmental Policy Act's (NEPA's) requirement to follow best available science.

## **Resolution Options Proposed by Objectors:**

- We ask for the development of detailed Standards and Guidelines that protect old growth habitat to "insure" wildlife viability and to protect wildlife diversity, as required by the NFMA. 16 U.S.C. § 1604. The revised LMP fails to do so and thus its approach to old growth is a violation of NFMA's viability requirement and NEPA's requirement to follow best available science. (Northeast Washington Forest Coalition)