

Department of the Interior
Office of the Secretary

Comments via online: <https://www.federalregister.gov/documents/2022/01/04/2021-28548/request-for-information-to-inform-interagency-efforts-to-develop-the-american-conservation-and#open-comment>

Re: DOI and interagency working group solicitation for comments on the American Conservation and Stewardship Atlas.

March 7, 2022

Dear Agencies and Departments,

This comment is submitted on behalf of Friends of the Clearwater (FOC), and focuses exclusively on how public lands fit into this conservation atlas. FOC's mission area includes watchdogging four million acres of national forests in North-Central Idaho.

There are some necessary choices in values, definitions, and datasets that your intra-agency, intra-department group must make to avoid a conservation atlas that culminates in greenwash. "Greenwash" is "disinformation disseminated by an organization so as to present and environmentally responsible public image."¹ Because our group's mission area encompasses primarily the public's national forests in North-Central Idaho, we are most familiar with the present efforts of the USDA, through the US Forest Service, to greenwash logging and grazing. Carrying forward such greenwash into a conservation atlas will not provide a useful informational public tool. Rather, it will mislead the public by representing that the U.S. is making "gains" on meeting the 30x30 commitment when such characterizations cannot be supported by the evidence or the science. There is actually another word for bias information that misleads the public to promote a political goal: "propaganda."

Friends of the Clearwater (FOC) raise these definitions because the task that our government has outlined for itself in creating a conservation atlas encompasses a responsibility to truth, accountability, and science. We implore you to approach this undertaking without ego—as employees within a political governmental machine who can honestly and objectively critique the failures as well as the successes of that political machine. This shouldn't be a "us" verses "them" or a "Biden Administration" verses "the critical public" dichotomy. This should be a "where are we now, what are our shortcomings, and what do we need to be doing better" kind of dialogue. Anything less risks sliding this conservation atlas becoming an exercise in propaganda.

¹ OxfordLanguages definition of "greenwash."

FOC would also point out that we've repeatedly raised some of these points in various invitations for comment on climate strategies for the very governmental entities now involved in creating this map. For example, in April 29, 2021, with over a dozen groups, FOC submitted a comment to the US Department of Agriculture (USDA) on climate strategy. In that comment, we asked for the USDA to let the science drive the policy. We discussed the importance of protecting national forests, and mailed the USDA a CD with over 50 peer-reviewed articles. We were disappointed that the USDA largely ignored our comments when discussing its climate strategy. Frankly, we were a little shocked that the USDA discussed "prescribed grazing" as a climate strategy. Ecosystems reap benefits when grazing stops. "Prescribing" grazing is like a doctor "prescribing" sugar in a diet to someone interested in weight loss.

Then the Council for Environmental Quality (CEQ) asked for feedback on the USDA's climate-action plan. Here, too, FOC and fellow conservation groups submitted feedback on the USDA's lacking climate-action plan and requested CEQ to reject it in a comment dated November 19, 2021. We've attached both of these comments because they are very relevant to establishing a standard for this conservation atlas—a standard that counts conservation of forests and meadows on our public lands when they are protected from logging and grazing.

Below is Friends of the Clearwater's comment on the Department of the Interior's (DOI's) request for information. DOI's request is reprinted verbatim in purple. FOC's response is in black. We note that the DOI has restricted how the public may participate in this process. The Department has only allowed online submissions and has imposed a limit on the number and size of attachments. Instead of burning all materials that could be easily copied to a disk or memory stick, the method of participation narrows the information we can provide. For example, there are data sets that are too big for the attachment-size parameters and it would be too time-intensive to attach articles one-by-one in more than a couple of submissions. As discussed above, the USDA already has some of this science from previous comments on climate strategy. The US Forest Service at the level of the Northern Region and the Nez Perce, Clearwater, and Idaho Panhandle National Forests have this science from us as well. Because you have limited how the public conveys information to you, we presume you intend to achieve the balance by tracking down citations and using links to download data sources that the public could not provide and that your agencies don't already have.

• *Science and Data. What data sources, standards, and technical approaches should be applied to data included in the Atlas to ensure that it is an authoritative and useful tool for the public?*

Data sources and standards to include and overlay to ensure this is a useful tool for the public:

1. **Tightly and substantively define "conservation" and "restoration," and explicitly disclose for the public what those terms do and do not include.** This intra-agency working group needs these parameters for any technical approach to mapping in an informative way, especially when agencies like the US Forest Service (under the USDA) uses "restoration" very loosely. For example, the Forest Service's titled "Hungry Ridge Restoration Project" is primarily a logging

project, authorizing 23 miles for land-disturbing temporary roads and allowing 7,144 acres of logging, among other activities. In this “restoration” project, the Forest Service authorized over 5,000 acres of regeneration logging, which include clearcuts and similarly intensive seed-tree and shelterwood cuts. The Forest Service authorized this logging in areas it concluded had old growth, and in other areas where it simply didn’t know. The negative logging impacts dwarf any activity that could actually be restoration. **To sum, a Forest Service “restoration” project authorized over 5,000 acres of clearcuts.** If this group does not define restoration, the Forest Service could present this area as “restored,” and this atlas might map it as a “restored” area even though a clearcut on our national forest looks like the picture our staff took of one below.



Hopefully we can all agree that clearcuts and regeneration logging is not “restoration.” Thinning is not, either, since it is antithetical to the concept of old growth. *See* Juel 2021 old-growth report cited and linked below. Yet, the Forest Service has carried forward this greenwashed definition of “restoration” to the international stage, claiming that it had restored 42 million acres of national forest land under the Bonn Challenge, which is a global effort to restore 370 million acres of forestland globally by 2030. Selling and cutting trees, and creating a homogenized forest structure by removing most of them, do not allow trees to grow and die in a heterogenous structure, and cycle nutrients back into the ecosystem. For reasons like these, logging does not “restore” any ecosystem function—the best available science suggests it impairs these areas for years.²

² Please refer to our discussion on this in the FOC et al. 2021 Red Siegel comments, pages 16-18.

We recommend a **definition of “restoration”** that includes removing the human-caused impediments to natural recovery, and an action that brings degraded air, water, and soil back to a condition it exhibited before the ecologically damaging human-footprint. “Restore” is a management-action word and cannot apply to features like mature and old growth forests, which exist because of ecological processes unfolding over the scale of centuries. Because of the very nature of how old growth develops, management actions cannot “restore” old growth. But, reducing the bloated road systems on national forests, however, road systems for which there is not nearly enough money to maintain, would certainly be restoration. You need to define “restoration” explicitly so road decommissioning could be understood as restoration, while US Forest Service activities that, in the agency’s parlance, “enhances” or “restores” mature forests and old growth, can never be mistook for restoration.

We recommend a **definition of “conservation”** would include preserving or protecting ecosystems by letting the forces of nature, i.e. natural disturbances, have a dominant role. “Conservation” should include restraint from exploitation, such as resource extraction or recreational activities. For example, while we cannot “restore” old growth, we can certainly conserve it by protecting it from any level of logging and allowing the forces of nature to continue to shape it. Andy Kerr offered a good comment on what “conservation” should mean, as well as a valid critique on how the Biden Administration is greenwashing this term for the American public. We’ve attached this critique as Kerr 2022_30x30_Part 1_By the Numbers, and Kerr 2022_30x30_Part 2_What conserved needs to mean.

- 2. Utilize US Geological Service GAP 1 and 2 areas as a starting place for mapping conserved areas, but refine what counts towards 30x30 depending upon the grazing allowed.** The Gap US Geological Survey map from 2019 (<https://www.sciencebase.gov/catalog/item/60247511d34eb120311388ff>): A conservation atlas that is useful to the public will identify and map public land that has substantive statutory protection, and delineate other vulnerable areas with conservation potential. Such delineations are important because the public should see what more could be protected. Specifically, GAP areas 1 and 2 have that substantive statutory protection with mandates to maintain biodiversity, restrict land-cover conservation, and protect from exploitative activities such as logging. GAP 1 and 2 areas should be the only ones that count as areas that enjoy conservation. GAP 1 includes wilderness and national parks, and GAP 2 includes wilderness study areas and national monuments. But taking the boundaries of the national park or national monument is not sufficient, for example, because there are visitors centers, campgrounds, parking lots, etc. that are not “conserved.” One can’t just say the whole park is conserved because there are parts that are really developed, and the government must account for these parts. Additionally, the agencies and departments should temper this data with the fact that grazing is

allowed in many GAP 1 and 2 areas (next bullet). The conservation atlas should recognize where old growth and roadless areas exist, but until these areas have substantive statutory protection, should denote them as vulnerable to anti-conservation actions, such as logging, that would undermine the 30x30 initiative.

3. **Grazing is not conservation.** Identifying and mapping grazing allotments on public land and recognizing their anti-conservation features will inform the public as to what the agencies could achieve for 30x30 if grazing were retired on public lands. Grazing creates greenhouse gas emissions and is not compatible with conservation.³ Grazing allotments are on file with the Bureau of Land Management and the US Forest Service. Because grazing comes with climate costs, grazed areas should not count as conservation unless the agency can show that grazing impacts are minimal (see below for more discussion on this). Use a biological diversity perspective when determining what amounts to a protected area when considering an area that is being grazed.
4. **Logging is not conservation.** The US Forest Service has ubiquitously promoted that there is a “fuel build-up” in our forests, and that our forests need to be “restored” to health with thinning and allowing more intensive logging to finance the thinning. FOC has repeatedly given the Forest Service the science demonstrating this narrative is not scientifically supportable nor helpful in the face of climate change. Here FOC included a comment that we submitted to the US Forest Service logging project, called the Red Siegel Project, that encompasses our repeated scientific discussions: stand-replacing fire is a natural ecosystem feature in certain areas; fire suppression has unlikely impacted the historical range of variability of fire; fire severity is not greater where fire has been absent; and climate and weather drive fire severity, but as a secondary factor, past logging can actually exacerbate fire severity from what might have otherwise existed if the area had been protected from logging. In fact, most of the carbon from logged wood is lost fairly immediately into the atmosphere, whereas even during the most severe wildfires, forests keep much of that carbon stored.⁴ It doesn’t take a math major to understand that if old growth takes 150 years of natural disturbances at play to develop and the Forest Service cuts down that old growth, that it will take 150 years to replace it.
5. Because logging is not conservation or restoration, fragmented habitat should be recognized as such on this atlas and should not be counted towards 30x30. The

³ For a brief scientific discussion on this, please refer to FOC et al.’s USDA climate strategy comments from 4-29-21.

⁴ See Friends of the Clearwater et al.’s April 23, 2021 Red Siegel project-development comments for a more elaborate discussion of these points. Please also see Harmon, M.E., Hanson, C.T., and DellaSala, D.A. 2022 (in press). *Combustion of Aboveground Wood from Live Trees in Megafires, CA, USA*, Forests; Stenzel et al. 2019. *Fixing a snag in carbon emissions estimates from wildfires*. *Global Change Biology* 25: 3985-3994.

FACTs database by the US Forest Service

(<https://data.fs.usda.gov/geodata/edw/datasets.php>) will inform this group of the logging on national forests. This conservation atlas needs clearly reflect this is not conservation and that logging is a setback to conservation and biodiversity.

6. Regeneration logging that has happened within the past half century should not be considered “restored” or “conserved.” US Forest Service records supersized openings that we call “supersized clearcuts.” By “clearcuts,” we mean the what the Forest Service often calls “regeneration” logging, and includes terms like “clearcut,” “shelterwood cut,” and “seed tree cut”; it means intensive cutting that removes most of the trees in an area. By “supersized,” we mean acreage that creates so large of an opening that it is not allowed under the National Forest Management Act without an exception from the regional forester. The Northern Region tends to rubber-stamp supersized clearcuts, and this has caused habitat fragmentation and other negative environmental issues in national forests. Friends of the Clearwater has detailed the trend in a report analyzed from a Freedom of Information Act response from the Forest Service. *See* Bilodeau and Juel 2021. [*THE CLEARCUT KINGS: The US Forest Service Northern Region and its obsession with supersized clearcuts.*](#) Other supporting information found at <https://www.friendsoftheclearwater.org/supersized-clearcut-report/>.
7. The past logging and current roads should be mapped in inventoried roadless areas, and an atlas that maps roadless areas with 30x30 potential should also denote its unprotected status as well as the current and ongoing logging in national forest inventoried roadless areas. Inventoried Roadless Areas are not classified in USGS Gap 1 or 2 areas, which is appropriate as the Forest Service has slipped around the rule’s prohibitions to log in the past decade. You could classify inventoried roadless areas as having potential to meet the 30x30, but because they are vulnerable to logging, you should not represent them as counting towards any 30x30 goal From 2008-2018, the Forest Service is using the logging exceptions in the 2001 Roadless Area Conservation Rule as well as the 2008 Idaho Roadless Rule to authorize, by its own admission, 19,000 acres of logging in national inventoried roadless areas in Idaho and 32,000 acres of logging in national inventoried roadless areas in Montana. Since 2019, the number of national inventoried roadless acres in Idaho where the Forest Service has approved or is currently entertaining logging has increased to over 60,000 additional acres. Friends of the Clearwater has detailed and analyzed this trend in a report based off of Forest Service disclosures and cross-references to National Environmental Policy Act documents. *See* [*Bilodeau and Macfarlane 2020. The Roadless Report: Analyzing the Impacts of Two Roadless Rules on Forested Wildlands.*](#) Other supporting information at <https://www.friendsoftheclearwater.org/the-roadless-report-analyzing-the-impacts-of-two-roadless-rules-on-forested-wildlands/>.

8. The conservation atlas should include old-growth inventories only if they have been verified on-the-ground, but cannot count these areas towards 30x30 and should explicitly demarcate these areas as unprotected. By “old growth,” we mean areas with mature trees where the ecosystems have been allowed to govern untrammelled by Forest Service management. These types of forests are store carbon.⁵ These types of forests absolutely must be preserved. A meaningful data source will consider where these areas are, recognize that many of these areas are vulnerable, and transparently show the public where logging units have eliminated these areas. FOC has recently published a report on the US Forest Service’s management of old growth. [Juel 2021. *MANAGEMENT OF OLD GROWTH IN THE U.S. NORTHERN ROCKY MOUNTAINS: Debasing the concept and subverting science to plunder national forests.*](#)

• **Conservation as a Continuum. How can the Atlas reflect the meaningful conservation work already underway in America?**

Measuring conservation work in a meaningful way means recording the losses as well as the gains. Simply recording the gains without the setbacks, such as logging in inventoried roadless areas or clearcutting old-growth forests, will give the public a skewed and misinformed idea of what the United States is doing for conservation—it will amount to propaganda. For example, decommissioning and recontouring 50 miles of Forest System Roads is restorative work—this looks positive and counted and reviewed in a vacuum. This picture is quite different, however, if in the same year the Forest Service decommissioned those 50 miles of road the agency also built on that same forest 50 miles of new permanent road, reconstructed 10 miles of road where vegetation had overtaken the road prism, and 30 miles of “temporary” roads, which tend to stay on the landscape far longer than the Forest Service currently acknowledges they do.

Thus, the atlas should measure the losses as well as the gains within a common theme, geographic or otherwise, and be regularly updated.

○ **What stewardship actions should be considered, in addition to permanent protections, to capture a more complete picture of conservation and restoration in America?**

A complete picture of public lands will identify the permanent land protection that protect public lands from habitat degradation, but also the areas where public lands *could* meet this initiative if permanently protected but are currently *not* protected. An informative map will delineate which is which and will update the public when lands that had potential lose that potential.

○ **What are the attributes of lands and waters that should be included in the Atlas?**

⁵ Please see our “FOC etal USDA climate strategy comments_4-29-21.pdf” for a discussion on proforestation and protecting large and old trees.

A conservation atlas should include geographic boundaries of GAP 1 and 2 areas as well as areas with potential to meet the 30x30 but are currently unprotected from exploitation.

○ **How can the Atlas best reflect the contributions of State, local, Tribal, territorial, and private lands?**

• **Outcomes. How can the Atlas best reflect land and water contributions to biodiversity, climate change mitigation and resilience, and equitable access to nature and its benefits?**

The best contribution will include honest definitions of “restoration” and “conservation” that haven’t been greenwashed, as well as regular updates. A one-time inventory will not capture how the U.S. is doing. Just as the map should reflect newly retired grazing allotments, which help mitigate against climate change and allow ecologically damaged areas to recover, the map should also reflect the unprotected old growth that the Forest Service logs, which exacerbates biodiversity loss.

The agencies need to dedicate resources to regularly update this map and honestly acknowledge where the government has achieved success as well as where governmental agencies are undermining the 30x30 goal.

Thank you in advance for considering comments on this important topic.



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