

To: Chief Randy Moore, U.S. Forest Service

Re: National Old Growth Amendment Draft Environmental Impact Statement

Date: August 13th, 2024

Dear Chief Moore,

We are writing to convey our deep concerns with the direction of the National Old Growth Amendment Draft Environmental Impact Statement. We urge the USFS to significantly strengthen the final record of decision to ensure meaningful protections for the nation's remaining old growth, and to lay the foundation to increase the abundance and distribution of old growth for future generations. Many of the undersigned organizations will separately submit detailed comments within the comment period. But given our level of concern with the DEIS we wanted to register our perspective now.

Currently, none of the proposed alternatives are likely to result in meaningful changes in the problematic management decisions we are seeing on the ground. We regularly see mature and old-growth trees targeted for commercial logging. Given the importance of our older trees and forests in fighting the climate and biodiversity crises, the amendments must end the cutting of all old-growth trees in national forests. In the rare circumstances where old-growth trees need to be cut (e.g. for public safety purposes), they should not be sent to a mill. In moist forests, no logging of any trees should occur in old-growth stands. In dry forests that are adapted to frequent fire, targeted, ecologically appropriate restoration may be beneficial where past mismanagement, such as fire suppression and logging, has occurred, but such should never be used as an excuse to fell an old-growth tree.

There are threats to federal forests including those posed by a changing climate, and, as the agency noted in its threat assessment, inappropriate vegetation management. Logging old-growth trees to save stands from potential threats is a false solution — they are worth more standing. These trees sequester and store significant amounts of carbon. They provide essential habitat. They help safeguard watershed integrity. They boost ecosystem resilience to fire. And they help regulate forest temperature. Logging them eliminates these benefits at the expense of forest ecosystems.

But, as written, the preferred alternative includes numerous opportunities for the agency to send these essential trees to the mill. And, compounding this open-ended discretion, the agency is not required to maintain a forest's old-growth status. All alternatives explicitly allow line officers the discretion to manage old growth out of existence in pursuit of "proactive stewardship" goals.

And they contain ambiguous language that could be used to justify continued commercial logging of old growth in the Tongass National Forest. The final policy must unambiguously correct these deficiencies.

The final record of decision must also establish strong monitoring and accountability measures, ensure the climate benefits of these forests are realized, and reduce the nature gap by ensuring that frontline communities and nature-deprived communities directly benefit from the policy.

The proposed policy recognizes the importance of restoring the abundance and distribution of old-growth across the country. But the policy prescriptions will not secure the significant management shifts necessary to accomplish that goal. Without clear protections aimed at recruiting old growth, the agency will fall short of EO 14072's goals. 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. Protection of mature forests can be accomplished in a manner that is consistent with addressing the threat of fire. They must be protected to aid in the fight against worsening climate change and rampant biodiversity loss. And they must be protected to ensure that our children are able to experience and enjoy old growth.

Given the outstanding role mature and old-growth trees and forests in national forests play in fighting the climate and biodiversity crises, it is vital that America establish meaningful safeguards for their conservation. The draft policy fails to achieve this. The final policy must ensure that old-growth trees stay in the forest and do not get sent to the mill. 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.

Sincerely,

350 Bay Area Action

350 Eugene

350 PDX

350 Salem Oregon

350 Seattle

350 VT

Alabama Interfaith Power & Light

Alpine Lakes Protection Society

Athens County's Future Action Network

Audubon Society of Corvallis

Audubon Society of Lincoln City

Bark

Biofuelwatch

Bird Alliance of Oregon (formerly Portland Audubon)

Californians for Western Wilderness

CalPIRG Student Chapters

CalWild

Cascadia Climate Action Now

Cascadia Wildlands

Center For Biological Diversity

Central Oregon LandWatch

Chattooga Conservancy
Climate Reality Project, Maryland Chapter
Climate Reality Project, Portland Chapter
Climate Writers
Coast Range Association
Community Earth Alliance
Conservatives for Responsible Stewardship
Creation Justice Ministries
Creek Lands Conservation
Earth Ethics, Inc.
Earth Law Center
Earth Neighborhood Productions
Earthjustice
EcoFlight
EcoVillageStL
Elwha Legacy Forests coalition
Endangered Habitats League
Endangered Species Coalition
Environment America
Environmental Action
Environmental Caucus of the Democratic
Party of Oregon
Environmental Law & Policy Center
Envision Frederick County
Feather River Action!
Firefighters United for Safety, Ethics, and
Ecology (FUSEE)
Forest Keeper
Forests Forever
Frazier Park Mountain Neighbors and
Progressives
Friends of Blackwater, Inc.
Friends of Douglas-fir National Monument
Friends of the Bitterroot
Friends of the Inyo
Friends of the Kalmiopsis
Friends of White's Woods, Inc.
Gallatin Wildlife Association
Green Snohomish
GreenFaith Wy'East

Greenspace - The Cambria Land Trust
Gulf Islands Conservancy, Inc
Heart of the Gila
Heartwood
High Country Conservation Advocates
Interfaith EarthKeepers
Interfaith Power & Light
Kalmiopsis Audubon Society
Keep the Sespe Wild Committee
Kentucky Heartwood
Kettle Range Conservation Group
Kingswood Camp
Kitsap Environmental Coalition
Klamath-Siskiyou Wildlands Center
Lane County Audubon Society
Latino Outdoors
Los Padres ForestWatch
Manchester VT Energy Committee
Massachusetts Forest Watch
MCAT, Mobilizing Climate Action Together
Michigan League of Conservation Voters
Natural Resources Law
New Mexico Wild
North County Watch
Northcoast Environmental Center
NRDC
Nuestra Tierra
Ohio Environmental Council
Old-Growth Forest Network
Olympic Climate Action
Olympic Forest Coalition
Oregon Wild
Oregon Unitarian Universalist Voices for
Justice
Owen-Putnam Friends of the Forest
Protect Our Woods
Quail Springs
Resource Renewal Institute
Rise Up WV
Rocky Mountain Wild

Rogue Valley Audubon Society
Safe Alternatives for our Forest
Environment
Salem Audubon Society
San Juan Citizens Alliance
Santa Cruz Climate Action Network
Sequoia ForestKeeper
Sierra Club
Sierra Nevada Alliance
SoCal 350 Climate Action
Soda Mountain Wilderness Council
South Umpqua Rural Community
Partnership
Southern Utah Wilderness Alliance
Speak For The Trees Too
Spokane Audubon Society
Standing Trees
Sustainable Ocean Alliance
Tennessee Heartwood
The Enviro Show
The Forest Advocate
The Highlands Nature Sanctuary/dba Arc of
Appalachia
The Ocean Project

The People's Justice Council
The Student PIRGs
Third Act Ohio
Thurston Climate Action Team (TCAT) Tree
Action Group
Travail en Réseau avec les Fédérations des
Femmes et Enfants en Détresse (TRAFFED)
Tualatin Riverkeepers
Umpqua Natural Leadership Science Hub
Umpqua Valley Audubon Society
Umpqua Watersheds
Unitarian Universalist Environmental
Justice Ministry
Unite the Parks
Upper Gila Watershed Alliance
UpstreamPgh
Whatcom Million Trees Project
WildEarth Guardians
Wildlands Network
Williams Community Forest Project
Women's Earth and Climate Action Network
(WECAN)
Yaak Valley Forest Council