



The League of Women Voters of Oregon, established in 1920, is a grassroots nonpartisan political organization that encourages informed and active participation in government. We envision informed Oregonians participating in a fully accessible, responsive, and transparent government to achieve the common good. LWVOR Legislative Action is based on advocacy positions formed through studies and member consensus. The League never supports or opposes any candidate or political party.

Date: February 1, 2024

To: [The Honorable Randy Moore, U.S. Forest Service](#)

Re: **Comments on Notice of Intent (88 FR 88042)**

Dear Chief Moore,

Last April, the League of Women Voters of Oregon submitted comments on the US Forest Service Advance Notice of Proposed Rulemaking (ANPR) (88 FR 24497) about how to address climate change and foster ecosystem resilience on federal forest lands. We are pleased to see the Forest Service has recognized the many benefits of mature and old-growth forests and will be providing better forest management direction for all 128 of its federal forests within the system.

The League of Women Voters of Oregon (LWVOR) bases our comments for the US Forest Service on this position taken by the national League: “The League supports climate goals and policies that are consistent with the best-available climate science to ensure a stable climate system for future generations. Individuals, communities, and governments must continue to address this issue, while considering the ramifications of their decision at all levels — local, state, regional, national, and global.” Furthermore, the LWVOR believes that a full accounting of all costs, including cumulative ecological impacts, of timber harvests and other forest uses must be considered in forest activity decisions.

Forest management must be responsive to scientific research and knowledge and should include:

- mapping, classification and protection of all streams
- more and better data—including total watershed analysis
- evaluation of cumulative effects of various activities in the forest in the consideration of individual forest practice permits

On December 20, 2023, USDA issued a Notice of Intent (NOI) for a National Forest Plan Amendment to Conserve and Steward Old Growth Forests across the country. As your NOI noted, old growth forests and the largest mature trees make our forests more resilient to wildfire, are more drought tolerant and resistant to disease and have the best potential to reseed adjacent areas. Intact ecosystems like old growth forests are essential to provide the best locations for threatened and endangered species, reducing the loss of biodiversity that climate change and loss of ecosystems are accelerating.

Specific Rule Amendment Recommendations

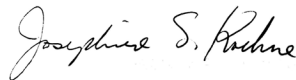
- Inventory all national forests with clear definitions for mature and old growth forests.
- Eliminate forest management plans that have logging quotas.
- Forest inventories should include previously forested areas to identify the best areas to reforest.
- Reinstate the 21-inch eastside forest rule; larger trees take up the most carbon by volume.
- In our forests in Oregon, the largest trees hold over 50% of the carbon compared to smaller trees which are often cut at less than 35 years.
- 40-50% of the carbon storage is in the soils of intact forests.

- Require improved logging techniques to protect the soil carbon by minimizing soil disruption,
- Consider using prescribed burning where appropriate and avoid the burning of slash, allowing it to degrade naturally to return carbon to the soil or to be used for biochar.
- Evaluate and require the use of selective logging to eliminate clearcutting.
- Define and promote the best climate-smart forestry possible, ideally exceeding Forest Stewardship Council's (FSC) certification requirements.
- Focus active fire management on areas adjacent to communities or other important cultural resources.
- Actively plant in areas of prior forests, along streams and rivers, and in only the most severe forest fire areas where natural reseeding is expected to be minimal.
- Include protection, active management and restoration of tidal forested wetlands— some of the highest carbon content of land types.
- Markedly increase the forests/shrub zones along rivers, streams and natural wetlands to improve water filtration, temperature reduction and water quantity.
- Reduce single species replanting to increase ecosystem diversity.
- Increase the staffing of science-based land managers who understand climate impacts and best practices needed for adaptation and conservation on all our forested landscapes.
- Protect mature trees in addition to old growth from logging to ensure there are old growth forests and adequate clean water supplies for future generations.

We urge you to consider these rule amendments. Thank you for the opportunity to submit them.



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