

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

Re: USDA Old-Growth Initiative

February 1st, 2024

---

Dear Chief Moore,

Thank you for starting a process that we hope will end with meaningful protections for existing old-growth forests and trees across the United States, and increase abundance and distribution of old-growth in the future. The undersigned organizations represent millions of Americans who care deeply about mature and old-growth tree and forest conservation across all national forests.

The severe loss of biodiversity and the worsening impacts of climate change require solutions that match the magnitude of the threats we face. We need transformational change, not the status quo or incremental steps towards future outcomes. Done properly, this Nationwide Forest Plan amendment could have a meaningful, near-term impact on confronting the climate crisis and on addressing the loss of biodiversity, and we look forward to working with the agency to see this potential realized.

The EIS must analyze alternatives with significantly strengthened protections of old growth. As written, the amendment would still allow for numerous unacceptable exceptions for commercial logging of old-growth. The Forest Service should, with very limited exceptions, end felling of old-growth trees everywhere and cutting in old-growth stands where fire is infrequent. And, in all events, the amendment language must be strengthened to completely eliminate the commercial exchange of old-growth trees. We also urge the Forest Service to remove the Tongass old-growth logging exemption from any further analysis in the upcoming EIS. Any financial incentive to log these trees will undermine the goals of the amendment and the desired climate and conservation outcomes of EO 14072.

We also urge consideration of provisions to preclude reliance on arbitrarily restrictive definitions that artificially limit the amount of old-growth forests ultimately protected by the proposed action. The Forest Service should ensure the amendment requires definitions that are fully inclusive of all old growth conditions, simple, and easily operationalized in the field.

And, consistent with the recognition in the notice of the importance of expanding the distribution and abundance of old growth forests, we encourage you to consider in the EIS process alternatives for conserving mature forests and trees, including their value as future old growth. National forests in certain geographic areas, for example national forests east of the 100th

meridian, have virtually no old growth left due to logging which makes protecting mature forests all the more important. While there are certainly other threats to our older forests to be addressed (such as wildfire), the agency-acknowledged threat of ecologically inappropriate logging remains wholly and directly under USFS's control.

The national forest plan amendment must also incorporate strong monitoring and accountability measures to track the abundance and distribution of mature and old-growth forests; ensure their value as a natural carbon sink is optimized over time; and reduce the nature gap by ensuring that frontline communities and nature-deprived communities directly benefit from the proposed amendments, including through the development of an "equity layer" to the United States Forest Service Climate Risk Viewer that demonstrates these benefits across the landscape and across diverse communities.

Thank you for the opportunity to provide feedback on this important effort. Given the outstanding role mature and old-growth trees and forests play in fighting the climate and biodiversity crises, it is vital that America establish the strongest possible safeguards for their conservation. We encourage the Forest Service to maintain its timeline for this amendment process, and robustly engage with Tribal Nations, the public, and other stakeholders.

Sincerely,

1000 Grandmothers for Future Generations  
350 Bay Area Action  
350 Eugene  
350 Humboldt  
350 Mass  
350 Sacramento  
350 Salem, Oregon  
350 Seattle  
350PDX  
Alabama Interfaith Power & Light  
Alaska Wilderness League  
Alpine Lakes Protection Society  
American Bird Conservancy  
Bark  
Biofuelwatch  
Black Hills Sierra Group  
California Environmental Voters  
California Native Plant Society  
Californians for Western Wilderness

Cascadia Climate Action Now  
Catoctin Forest Alliance  
Center for Biological Diversity  
Center for Responsible Forestry  
Central Oregon LandWatch  
Chattooga Conservancy  
Church of the Brethren, Office of Peacebuilding  
and Policy  
Citizens' Climate Lobby  
Clean Black Lake Alliance  
Climate Action California  
Climate Communications Coalition  
Climate Reality Project, Portland Chapter  
Climate Writers  
Coalition on the Environmental and Jewish Life  
Coalition to Protect America's National Parks  
Connecticut River Defenders  
Conservación ConCiencia  
Conservation Northwest

Cottonwood Environmental Law Center  
Creation Justice Ministries  
Dogwood Alliance  
DPO Environmental Caucus  
Earth Ethics, Inc.  
Earth Law Center  
Earth Neighborhood Productions  
Earthjustice  
EcoFlight  
Endangered Species Coalition  
Environment America  
Environmental Action  
Environmental Law & Policy Center  
Environmental Protection Information Center  
Extinction Rebellion Vermont  
Federation of Western Outdoor Clubs  
First Christian Church, Bloomington  
Forest Keeper  
Forests Forever  
Foundation Earth  
Franciscan Action Network  
Friends of Blackwater, Inc.  
Friends of Douglas-Fir National Monument  
Friends of Miller Peninsula State Park  
Friends of the Bitterroot  
Friends of the Ferdinand State Forest  
Friends of the Inyo  
Friends of White's Woods, Inc.  
Gallatin Wildlife Association  
Georgia Interfaith Power and Light  
Grand Canyon Trust  
Great Old Broads for Wilderness  
Great Old Broads for Wilderness, Cascade-  
Volcanoes Chapter  
Great Old Broads for Wilderness, Central  
Oregon Bitterbrush Chapter  
Great Old Broads for Wilderness, Nor'easter  
Broadband  
Great Old Broads for Wilderness, Northern San  
Juan Chapter  
Great Old Broads for Wilderness, Polly Dyer  
Seattle Chapter  
Great Old Broads for Wilderness, SW Utah  
Broadband  
Great Old Broads for Wilderness, Willamette  
Valley Broadband  
Great Old Broads for Wilderness, Yavapai-  
Prescott Broadband  
Green Snohomish  
GreenFaith Wy'East  
GreenLatinos  
Hartland Community 4 Youth and Families  
(HC4YF)  
Healthy Ocean Coalition  
Heartwood  
High Country Conservation Advocates  
Indiana Forest Alliance  
Indigenous Environmental Network  
Interfaith EarthKeepers  
Interfaith Power & Light  
Interreligious Eco-Justice Network/CT Interfaith  
Power & Light  
Keep the Woods  
Kentucky Heartwood  
Kentucky Resources Council, Inc.  
Kentucky Student Environmental Coalition  
Kettle Range Conservation Group  
Klamath Forest Alliance  
Klamath-Siskiyou Wildlands Center  
Lake Tarleton Coalition  
Latino Outdoors  
Laudato Si Movement  
League of Conservation Voters  
Legacy Forest Defense Coalition  
Mason County Climate Justice  
Minnesota Interfaith Power & Light  
Mobilizing Climate Action Together (MCAT)  
Montana Interfaith Power & Light  
National Parks Conservation Association  
Natural Resources Council of Maine  
Natural Resources Defense Council (NRDC)  
Natural Resources Law  
New Jersey Forest Watch  
New Mexico Sportsmen  
New Mexico Wild  
Northcoast Environmental Center  
Northeastern Minnesotans for Wilderness  
Occupy Bergen County

Ohio Environmental Council  
Old-Growth Forest Network  
Olympic Climate Action  
Olympic Forest Coalition  
Oregon Unitarian Universalist Voices for Justice  
Oregon Wild  
Pilchuck Audubon Society  
Portland Audubon  
Portland Audubon, Ten Mile Creek Sanctuary  
Presbyterian Church USA  
Protect Our Woods  
Resource Renewal Institute  
RESTORE: The North Woods  
Rio Grande Indivisible, NM  
Rocky Mountain Wild  
Safe Alternatives for our Forest Environment  
(SAFE)  
Sage Steppe Wild  
San Francisco Bay Physicians for Social  
Responsibility  
San Juan Citizens Alliance  
San Luis Valley Ecosystem Council  
Santa Cruz Climate Action Network  
Santa Fe Forest Coalition  
Save Our Wild Salmon Coalition  
Save Our Woods  
Sierra Club  
Sierra Foothills Audubon Society  
South Umpqua Rural Community Partnership  
Southeast Alaska Conservation Council  
Southern Utah Wilderness Alliance  
Speak For The Trees Too, WV  
Spokane Audubon Society  
Standing Trees

Student Public Interest Research Groups  
(PIRGs)  
The Enviro Show  
The Forest Advocate  
The Forest Restoration Group  
The Ocean Project  
The People's Justice Council  
Thurston Climate Action Team (TCAT)  
Trout Unlimited - South Coast  
Tualatin Riverkeepers  
Turtle Island Restoration Network  
Umpqua Natural Leadership Science Hub  
Umpqua Watersheds  
Unitarian Universalists for a Just Economic  
Community  
Unite the Parks  
United Church of Christ  
United Plant Savers  
Upper Gila Watershed Alliance  
Water League  
Wendell State Forest Alliance  
Western Environmental Law Center  
Western Slope Conservation Center  
Western Watersheds Project  
Whatcom Million Trees Project  
Wild Watershed  
WildEarth Guardians  
Wilderness Workshop  
Wildlands Network  
Williams Community Forest Project  
Women's Earth and Climate Action Network  
Wyoming Wilderness Association  
Yaak Valley Forest Council