



September 16, 2024

RE: Comments on Draft EIS for old-growth forest protections across the National Forest system

Dear Chief Moore,

I value the ecosystem services our forested public lands provide for the survival of the human species amidst a climate crisis. The carbon sequestration, clean water, clean air, and wildlife/biodiversity habitat that mature and old-growth forests supply for our communities is truly unmatched and cannot be replaced.

The National Old-Growth Amendment must:

- End the cutting of mature and old-growth trees in all national forests and all forest types.
- End any commercial exchange of mature and old-growth trees. Even in the rare case where an older tree is cut entirely for public safety, that tree should be left in the forest and not be sent to the mill.
- Recognize the important role of mature and old growth forests in climate mitigation, biodiversity, and a host of irreplaceable ecosystem services.
- Recognize the critical biogeographic differences among the nation's forests, particularly the ecological differences between moist and dry forests.
- Follow the full direction of Executive Order 14072 to protect our nation's mature and old-growth forests and close loopholes.
- Incorporate the intent of more than half-million public comments the agency received following the notice of proposed rulemaking in support of mature and old-growth forest protection.

The National Old-Growth Amendment must protect mature and old-growth forests

The ecosystem value of old-growth forests lasts only as long as the old forests themselves. Therefore, it is absolutely necessary to protect mature forests in addition to old-growth to ensure these vital forested ecosystems are perpetuated into the future for the health of our nation and the world. In the Pacific Northwest, mature trees are defined as trees 80 years old and older. Cutting down mature and old-growth trees to save them from potential threats is a false solution — they are worth more standing.

Both mature and old-growth forests offer unrivaled ecosystem services when they are allowed to remain uncut:

- **Mature and old-growth forests protect our climate.** They absorb and store massive amounts of carbon; they boost resilience to fire; they store water; and they moderate temperatures. The most effective way to slow the rate of global warming is to allow big, old trees to grow bigger and older in fully intact forest ecosystems, where even the dead continue to contribute habitats, soil, and carbon storage.
- **Mature and old-growth forests protect our water supply.** Abundant biomass, including tons of mosses and lichens, soak up rainwater and release it slowly during dry seasons; forest roots stabilize stream banks and hillsides to slow erosion; intact forests protect and filter drinking water for communities downstream.
- **Mature and old-growth forests protect wild salmon.** Large wood from mature forests is a key component for aquatic habitats from the steepest headwaters to the largest rivers and estuaries. The shade from big trees keeps streams cooler; fallen branches provide an abundance of invertebrate prey; downed logs provide pools and shelter from winter floods.
- **Mature and old-growth forests protect threatened species.** They provide species—such as northern spotted owls and marbled murrelets—essential shelter from invading predators—such as barred owls and ravens that further endanger these threatened species.

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