

Dear Forest Service and Chief Moore,

Thank you for accepting this public comment for the National Old Growth Amendment Draft Environmental Impact Statement (DEIS).

END COMMERCIAL LOGGING OF ALL MATURE AND OLD-GROWTH TREES ON NATIONAL FOREST LAND!

The USFS needs to strengthen and protect, once and for all, the last remaining old-growth forests on USFS land in the United States. Most credible estimates are that we only have 3% of old-growth forests remaining, and that tiny, miniscule amount of incredibly important and biodiverse forests needs full protection. There should not be any logging of any kind, with no exceptions, in old-growth forests any longer. We need old-growth for climate, wildlife habitat, and drinking water.

The USFS forests are vital to our country, providing cold, clean water for people and wildlife, inspiring places for contemplation and recreation, older forests home to rare species, climate change mitigation, and job opportunities.

It is crucial that we ensure that these ecosystem services continue to flow from our national forests and that they are able to adapt to a changing climate.

In order to protect old-growth forests into the future you must also protect all remaining mature forests as well, in order to recruit old-growth forests into the future. Trees don't live forever, and in order to have old-growth in another couple hundred years, we need to protect mature forests now so that they can grow into old-growth forests.

The USFS needs to recognize and take into account the critical role old-growth and mature forests on public lands play in providing clean water, mitigating climate change, and protecting biodiversity. The Northwest Forest Plan was enacted to halt and reverse the devastation caused by past logging and road-building. These practices drove the extinction of old growth-dependent wildlife like northern spotted owls and marbled murrelets, polluted water, and destroyed ecosystem function. In light of the climate and extinction crises, the plan must be expanded to protect our last remaining mature and old-growth forests and the benefits they give all of us.

- Ensure consistency with President Biden's 2022 Executive Orders on forest protection and climate resilience, which recognize the critical role national forests play in halting the climate and biodiversity crises.
- Preserve biodiversity and improve connectivity of wildlife habitat. This habitat includes not only threatened and endangered species, but all species that have been harmed by the loss and fragmentation of habitat. Reserve networks for habitat connectivity need to be set aside and protected for the survival of biodiversity into the future.
- Protect and *expand* the reserve network on USFS land. It has been successful until now because it moved many older forests into "reserves" that limited commercial logging. It's imperative that these reserves continue to be protected from attacks by the timber industry. The reserve network should include connectivity reserves, as well as reserves

specifically for climate, biodiversity, connectivity and wildlife habitat. There should be NO EXCEPTIONS for logging in reserves.

- Increase Special Interest Area protections and designate new Special Interest Areas for cultural, ecological, and historical significance, including the protection of mature and old-growth forests to protect against further climate change. We need climate refugia throughout the Forest Service lands, and mature and old-growth forests will provide that. Special Interest Areas are one tool to provide this climate refugia for mature and old growth forest.
- Create carbon reserves for carbon storage in general, with no age class of trees as a target. The trees can grow and hold carbon into the future.
- Protect complex, early seral forests from logging. The condition of present and future fire-affected forests is degraded by salvage logging after fires. This activity destroys the soil and important wildlife habitat, pollutes water, and erodes natural forest regeneration processes. Post-fire logging also massively degrades pollinator habitat. I've seen over and over a huge super bloom of wildflowers triggered from high severity fire, that is critical for pollinators of all kind, and then the USFS will go in and salvage log the forest and drag logs all over the wildflowers and destroy the best blooms that pollinators have had, in sometimes 100 years in some places due to fire suppression. Pollinators need fire for big post-fire blooms, and salvage logging destroys critical pollinator habitat. Protecting mature and old-growth forests, also means protecting everything that lives in those forests, including wildflowers and understories that are habitat for pollinators. Pollinator protection must be a focus of old-growth protection, especially in the post-fire environment where flowers flourish.
- Deemphasize timber production. Any changes must set new timber targets that recognize communities' decreased reliance on forest exploitation and more appropriately limit the amount of commercial logging that occurs on public lands. Mature and old-growth trees are worth more standing than logged. Recreation is worth way more economically to communities in the US than logging. Logging towns are depressed, poor communities. Towns that rely on recreation of protected lands are vibrant and thriving. I say this as a rural person that has lived on the edge of the National Forest for 25 years in a remote location. Recreation and protected lands and forests are worth way more economically to my local, rural community in the Applegate Valley of southern Oregon, than logging.
- Expand and strengthen the Aquatic Conservation Strategy. This has been one of the most successful components for protecting mature and old forests in riparian areas, but as climate change and the freshwater extinction crisis worsen, expanded riparian buffers and additional key watershed designations are necessary to protect salmon runs and water quality.
- Expand and strengthen the Botanical Area network. Botanical Areas are critically important to preserve biodiversity. Many well deserving areas with high biodiversity were left out of the original Botanical Area network due to logging pressures, and many more areas should be included in the Botanical Area network, including areas with rare conifer species, or species at the edge of their range. Botanical Areas should be treated like reserves and truly protected from damaging land management actions, especially bulldozers during wildfire, which can wipe out whole populations of rare plants in one afternoon. Grazing allotments should exclude Botanical Areas to protect high value species from cattle grazing that reduces their flowering and ability to set seed and expand

or maintain their populations. Grazing permittees should be given rules to keep their cows out of botanical areas through herding, fencing, or virtual fencing. Rare conifers need protection. The Klamath-Siskiyou region of northwest California and southwest Oregon has many species of rare conifers that grow nowhere else on earth, and the mature and old-growth forests of these rare species can be protected in reserves as part of the Botanical Area network, protected from the stressors of logging and grazing. Old-growth aspen tree stands in the Siskiyou Mountains are constantly impacted by the cows in remote areas on grazing allotments. The only stands of Pacific silver fir in the Siskiyou Mountains are threatened by grazing, where cow trampling is an impact. Other rare conifers, like Baker's cypress (*Hesperocyparis bakeri*) that have serotinous cones and need wildfire, are threatened by fire suppression. If we have botanical areas where these rare species can thrive and be allowed to burn, then it would protect the mature and old-growth Baker's cypress into the future, so that their populations can be renewed and thrive.

- Old-growth forests are threatened by roads and habitat fragmentation from roads. Strengthen the guidance and goals for road closures and obliteration through regrading and putting more roads to bed. This will help improve watersheds, water quality, habitat connectivity, and it will create more fire resiliency since more human caused fires are started along roads. The more roads you have the more opportunity for fire starts during high winds and high temperatures. The USFS has a massive backlog of road maintenance, and improving the road obliteration program and increasing the number of miles obliterated will only be helpful in the long run both ecologically and economically. There are way too many roads in the USFS road system.
- Conservation of the northern spotted owl, marbled murrelet, and native salmonids was a cornerstone of the 1994 NFP, and an amendment should only maintain and enhance protections for at-risk fish and wildlife. The National Old-Growth Amendment should bolster efforts to recover wildlife, recognizing the ongoing threat of climate change and past management practices. To protect biodiversity in the era of climate change, the old growth amendment must ensure habitat resilience from disturbances such as wildfire, drought, disease, and insects. The best way to do that is to allow for wildland fire use, and wildfire management that allows for some fire to burn on the landscape, using "loose-herding" techniques, that allow for mature and old-growth forest to burn under favorable conditions, while still protecting human infrastructure.
- The USFS must provide strong monitoring and accountability measures, both for tracking the abundance and distribution of mature and old-growth forests, and for ensuring their value as a natural carbon sink is optimized over time.

The future citizens of the United States are counting on the USFS to act now to protect the land, forests for future generations. Protecting mature and old-growth forests is critical to the health of ecosystems and communities. I urge you to ensure that any proposals at least maintain existing ecosystem-based conservation goals, but I'm counting on you to go further to strengthen these provisions — we need a diameter cap of 21" DBH for all trees, and an age cap at 100 years of age. No trees over 21" DBH, or over 100 years of age should be logged.

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 Land Management Plan Direction for Old-Growth Forest Conditions Across the National Forest System could have a meaningful, near-term impact on confronting the climate crisis and on addressing the loss of biodiversity, and we look forward to seeing this potential realized.

The final record of decision should:

1. End the cutting of old-growth trees in all national forests and forest types and end the cutting of any trees in old-growth stands in moist forest types.
2. End any commercial exchange of old-growth trees. Even in the rare circumstances where an old-growth tree is cut (e.g. public safety), that tree should not be sent to the mill.

Cutting down old-growth trees to save them from potential threats is a false solution. They are worth more standing.

The Forest Service should adopt a record of decision that is a strengthened version of Alternative 3 in the Draft Environmental Impact Statement—modified as recommended in detailed joint comments you are receiving from a coalition of national, regional, and local conservation and public interest organizations.

Mature and old-growth trees and forests protect our climate by absorbing and storing carbon, boost resilience to fire, help regulate temperatures, filter drinking water and shelter wildlife. Logging them deprives us of the benefits and beauty of our largest, oldest trees.

The proposal allows old-growth trees to be sent to the mill and allows agency staff to manage old-growth out of existence in pursuit of “proactive stewardship” goals. The draft also contains ambiguous language that could be used to justify continued commercial logging of old growth in the Tongass.

The DEIS fails to protect mature trees and forests. 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 biodiversity loss. And they must be protected to ensure that our children are able to experience and enjoy old growth.

Thank you for this opportunity to provide comments on this important Forest Service direction.

A handwritten signature in cursive script, appearing to read "Suzie Savoie".

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