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FRIENDS
of ANIMALS

September 17, 2024

Submitted at: https://cara.fs2c.usd.gov/Public//CommentInput?Project=65356

Director
Ecosystem Management Coordination
201 14th Street SW
Mailstop 1108
Washington, D.C. 20250-1124

RE: Comment by Friends of Animals on the United States Department of Agriculture – Forest Service's Draft Environmental Impact Statement for Amendments to Land Management Plans to Address Old-Growth Forest Conditions Across the National Forest System

Dear Forest Service and USDA Officer:

Friends of Animals[1] submits this comment in response to the United States Department of Agriculture Forest Service's (the "Forest Service') Notice of Availability of the Draft Environmental Impact Statement ("Draft EIS") making amendments to all land management plans, 128 in total, across the National Forest System.[2] The amendments' intent is to "foster the long-term resilience of old-growth forests and their contributions across the National Forest System."[3] Forests are home to countless animals and play a critical and irreplaceable role in the health and biodiversity of the nation's ecology. The Forest Service acknowledged that "older forests often exhibit structures and functions that contribute to ecosystem resilience to climate change."[4]

It is well-established that there exists a circular relationship in which climate change adversely affects the health of the nation's forests, and the drastic reduction in mature and old-growth forests, caused by a variety of sources, eliminates a source of carbon capture

[1] Friends of Animals is a non-profit international advocacy organization incorporated in the state of New York since 1957. Friends of Animals has nearly 200,000 members worldwide. Friends of Animals, and its members, seek to free animals from cruelty and exploitation around the world, and to promote a respectful view of non-human, free-living and domestic animals throughout the world, promoting a healthy global environment.
[2] United States Department of Agriculture, Forest Service, *Amendments to Land Management Plans to Address Old-Growth Forests Across the National Forest System – Draft Environmental Impact Statement,* (June 2024).
[3] *Draft EIS*, p. S-1.
[4] 88 Fed. Reg. 24503.j

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and storage vital to combat the effects of climate change. Importantly, healthy old-growth and mature forests improve fire resiliency and help combat the catastrophic wildfires that have become more prevalent in recent years due to climate change, becoming a regular occurrence over fire seasons that have become longer and more intense.

Friends of Animals is encouraged by the Forest Service's acknowledgment of our nation's forests' vital role in the battle against climate change. Friends of Animals strongly encourages forest planning and management that places a premium on promoting the health and preservation of healthy old-growth and mature forests without reducing forests to clear-cut wastelands resulting from commercial logging interests or mismanagement of pristine forest areas. Friends of Animals supports the Forest Service's mission to promote ecological integrity and climate resilience when exploring the management of the nation's vast and pristine forest lands and strongly encourages the Forest Service to address forests in a way that does not include harvesting the stands of old-growth and mature forests that are so critical for capturing and storing carbon, protecting healthy ecosystems for wildlife, and supporting forests that are resilient to wildfires.

Unfortunately, the Forest Service's Draft Environmental Impact Statement (EIS) falls short of these critical objectives. The Draft EIS fails to: (1) thoroughly explore alternatives that would prohibit the removal of mature and old-growth trees; (2) provide an adequate analysis of how the proposed management strategies would impact wildlife species, particularly those that are endangered or threatened; and (3) fails to acknowledge mature and old-growth trees' resilience to wildfires.

Executive Orders and Background

On April 22, 2022, President Joe Biden issued Executive Order 14072 titled "Executive Order on Strengthening the Nation's Forests, Communities, and Local Economies."[5] At the core of the Executive Order is protecting and strengthening America's forests, including the increasingly endangered and threatened mature and old-growth forests. As the Executive Order states, "[f]orests provide clean air and water, sustain the plant and animal life fundamental to combating the global climate and biodiversity crises, and hold special importance to Tribal Nations."[6] The Executive Order continues, "[g]lobally, forests represent some of the most biodiverse parts of our planet and play an irreplaceable role in reaching net-zero greenhouse gas emissions."[7] Approximately 30 percent of the annual carbon dioxide emissions from human activities are absorbed by the terrestrial carbon sinks provided by forests. And in the United States, "forests absorb more than 10 percent of the annual . . . economy-wide greenhouse gas emissions."[8] Section 2(b) of the Executive

[5] Draft EIS, p. S-3. (citing Executive Order No. 14072, 87 Fed. Reg. 24851(2022)).
[6] Executive Order No. 14072, 87 Fed. Reg. 24851 (2022).
[7] *Id.*
[8] *Id.*

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Order directed the Forest Service to "inventory old-growth and mature forests, accelerate reforestation, create and sustain jobs in the sustainable forest product sector, and develop policies to institutionalize these actions."[9]

In following President Biden's Executive Order to produce an inventory, the Secretary of the U.S. Department of Agriculture issued a memo on June 23, 2022, stating that the "Forest Inventory and Analysis (FIA) data indicates that there are 134 million acres of total forest area on land managed by the agency within the contiguous U.S., of which 56 million acres are older than 100 years and approximately 11 million acres are estimated to be 200 years or older."[10] In the related Secretary's Memo, it was proposed that by April 22, 2023, the Service would "develop strategic guidance and an implementation plan to: (a) Immediately increase climate-informed afforestation, agroforestry, and reforestation (planting and natural regeneration) including critical consideration given to climate-informed reforestation in areas such as fire scars that can help avoid carbon loss from forest soils."[11] While the Secretary's Memo advocated for afforestation and replanting of trees in adversely affected regions, the usual method of management included "mechanical thinning; proactive fire use including prescribed fire and cultural burning; management approaches that consider composition, competition and structure in forest stands; promoting the growth of tree seedlings; adopting and continuing soil-friendly practices; or utilizing climate-forward reforestation techniques with the right trees in the right places and at appropriate scales."[12]

The Forest Service completed a final draft of the inventory mandated by EO 14072 in April 2024.[13] The initial inventory indicated that "the Forest Service manages an extensive, ecologically diverse mature and old-growth forest estate."[14] Through the inventory, the Biden administration identified "more than 175,000 square miles of old growth and mature forests on U.S. government land," considering land managed by the Forest Service and the Bureau of Land Management, excluding old-growth forests in Alaska.[15] The Forest Service identified "an estimated 24.7 million acres of old-growth forest conditions and 68.1 million acres of mature forest conditions representing 17 and 47 percent, respectively, of the 144.3 million acres of forested National Forest System lands."[16]

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[9] *Id.*
[10] *Secretary's Memorandum 1077-004: Climate Resilience and Carbon Stewardship of America's National Forests and Grasslands* (issued June 23, 2022), p. 2-3; available at: https://www.usda.gov/directives/sm-1077-004.
[11] *Id*. at p. 8.
[12] *Id*. at p. 3.
[13] Draft EIS, p. S-4.
[14] 88 Fed. Reg. 24503.
[15] *The U.S. Plans New Protections for Old Forests Facing Pressure from Climate Change,* April, 20, 2023, https://www.npr.org/2023/04/20/1171066279/old-growth-forests-protections-climate-change (accessed January 25, 2024).
[16] Draft EIS, p. S-4.

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Under section 2(c)(ii) of the 2022 Executive Order, the Forest Service was also required to analyze threats to the mature and old-growth forests inventoried under section 2(b). Under this threat assessment, the Forest Service determined that "mortality from wildfires is currently the leading threat to mature and old-growth forest conditions."[17]

The Forest Service acknowledges that "past management practices, including timber harvest and fire suppression, contributed to current vulnerabilities in the distribution, abundance, and resilience of old-growth forest characteristics."[18] Despite the current vulnerabilities, the lands of the National Forest System have the "inherent capability to sustain old-growth forest conditions into the future," as indicated by the present amount and distribution of mature forests in the Forest System.[19] The foundation for strong and healthy forests exists, and must be nurtured for the future. The Forest Service has determined that amending land management plans throughout the National Forest System is "the most judicious approach" to achieving the objective and implementing President Biden's Executive Order and section 23001(a)(4) of the Inflation Reduction Act.[20]

Forests play a critical and irreplaceable role in the health and biodiversity of the nation's ecology. The Forest Service acknowledged that "older forests often exhibit structures and functions that contribute to ecosystem resilience to climate change."[21] Logging and prescribed burns will result in the removal of thousands of acres of mature and old-growth forests, which cannot be replaced for decades or even centuries. Such land planning will not only remove trees vital to the ecosystem but also threaten the health of the animals in the region, cause erosion and water degradation, and remove a key source of carbon absorption and storage during a global climate crisis.

The consequences of removing mature and old-growth forests are well-documented and acknowledged by the Forest Service. The Forest Service failed to sufficiently consider the likelihood of these adverse consequences in the absence of necessary protections for old-growth and mature forests, and the Forest Service should have taken a hard look at all effects of removing old-growth and mature trees and considered alternatives that protect our national forests.

[17] *Id.*
[18] *Id.*
[19] Draft EIS, p. S-4.
[20] Draft EIS, p. S-1.
[21] 88 Fed. Reg. 24503.j

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A. Mature and old-growth forests are essential to the carbon capture and storage needed to battle climate change, and the Forest Service should not implement land management plans that include the removal of mature and old-growth trees.

The Forest Service has stated that the purpose of amending the land management plans throughout the National Forest System is to "foster ecologically focused management across the National Forest System by maintaining and developing old-growth forests while improving and expanding their abundance and distribution" to avoid threats from various sources, including climate change.[22] Unfortunately, the Forest Service includes tree removal through logging and prescribed burns as one possible method for managing the nation's old-growth and mature forests. The Forest Service also directs the agency action at only "old-growth forests" and omits "mature forests" despite the critical importance of all trees, including old-growth, mature, and juvenile.

"America's forests—from mature and old-growth stands to working forests—already capture more than 10 percent of our nation's carbon emissions each year, and they have the potential to do more."[23] Even mature trees that are damaged by fire continue to contribute more to batting the climate crisis than trees that have been logged. "When mature trees are affected by fire, they often survive with their carbon stores intact – protected by adaptations such as thick bark and high crowns – and continue to grow."[24] In fact, carbon emissions from logging can be up to eight times greater than carbon emissions from wildfires, as even trees that are killed by wildfire will slowly emit carbon through decomposition, as opposed to the immediate release from logging. As a result, "total national carbon emissions from logging exceed those from fire."[25] "Logging in U.S. forests emits 723 million tons of uncounted CO_2 into our atmosphere each year – more than 10 times the amount emitted by wildfires and tree mortality from insects combined."[26] Decreased density logging by thinning under fire management programs, emits three times the amount of CO_2 emitted by wildfire.[27] Further, carbon emitted through logging is largely emitted immediately as the by-products of logging are used for energy production through

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[22] Draft EIS, p. S-6.
[23] *Secretary's Memorandum 1077-004: Climate Resilience and Carbon Stewardship of America's National Forests and Grasslands* (issued June 23, 2022); available at: https://www.usda.gov/directives/sm-1077-004.
[24] *The Significance of Carbon Emissions from Logging on Federal Forests,* https://www.climate-forests.org/post/the-significance-of-carbon-emissions-from-logging-on-federal-forests (accessed January 25, 2024).
[25] *Id*.
[26] *Open Letter to President Biden and Members of Congress from Scientists: It is essential to Remove Climate-Harming Logging and Fossil Fuel Provisions from Reconciliation and Infrastructure Bills*, November 4, 2021, previously available at: https://congress.gov/117/meeting/house/114492/witnesses/HHRG-117-GO28-Wstate-KingC-20220316-SD0004.pdf (attached to this Comment).
[27] *Id*.

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biomass or burning of mill residues, expediting the process by which carbon is released.[28] The Forest Service should conduct rulemaking in accordance with climate scientists, and limit carbon emissions by eliminating logging of any forests, particularly mature and old-growth forests, and emphasize that the best path to combating climate change is to protect healthy forests in their natural state.

In the past, cutting trees was a management tool used to protect against various threats, including wildfires and pests, immediately removing a tremendous source for capturing and storing carbon.[29] Some have argued that carbon storage continues even after felling, as wood and paper products produced from the logged trees will retain and store carbon in their second life as a manufactured product.[30] This was, and still is, a short-sighted approach that fails to acknowledge the critical importance of forests capturing and storing carbon through the photosynthesis process that occurs only in living trees. With products manufactured from wood-based products from harvested trees, not only does the capture process end once the tree is cut down, but the logging process itself increases the carbon emitted into the environment. The Forest Service should use the EIS to explore only alternatives that do not remove old-growth and mature trees as a management tool.

Studies have also shown that older forests, specifically those with trees over 150 years old, are more resilient to the effects of climate change.[31] Older forests tend to be "more structurally complex, with trees growing at multiple heights and larger canopy gaps," allowing for more space to grow and more availability of light for a variety of species. The forests provide a perfectly symbiotic relationship with the environment, developed over centuries and millennia, in which living trees are not only resilient to climate change but also play a vital role in reducing the carbon that contributes to climate change. Removal of any tree stands, including mature and old-growth forests, should not be considered a viable forest management method, particularly because the Forest Service has acknowledged that climate change is one of the primary threats to our national forest system.[32] In drafting the EIS and attempting to achieve the stated objective of minimizing the threat of climate change, the Forest Service should place a primary emphasis on evaluating alternatives that do not involve the removal of trees, particularly from old-growth and mature forests.

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[28] *Id*.

[29] Draft EIS, p. S-4.

[30] Northeastern Logging Manufacturers Association (NELMA), *Long Lived Wood Products Can Benefit the Climate Even More Than We Thought*, https://nelma.org/long-lived-wood-products-can-benefit-the-climate-even-more-than-we-thought (accessed January 25, 2024).

[31] Science Daily, *Older Forests Resist Change, climate change, that is*, https://www.sciencedaily.com/releases/2019/06/190607122408.htm (accessed January 25, 2024).

[32] Draft EIS, p. S-4.

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B. The Forest Service failed to consider in the Draft EIS that mature and old-growth forests are essential for fostering the biodiversity and ecosystem health needed for endangered and threatened wildlife and plants.

Logging mature and old-growth forests not only removes trees vital for capturing and storing carbon but also permanently alters the biodiversity in the ecosystem of the logged area. Logging and prescribed burns remove an invaluable component of the forest ecosystem and adversely affect the plant, animal, and bird species that rely on a strong forest for the survival of their habitat. Regardless of the forest region, there will inevitably be endangered or threatened species that will suffer from the removal of their forest habitat.

In the recent past, multiple proposed or active logging operations have threatened various species of plants, birds, insects, and animals. For instance, logging operations in the Green Mountain National Forest in Vermont, endangered bat species that relied on the forests for survival.[33] In Washington, Oregon, and Northern California, various species of owls suffer from deforestation.[34] Other species, including the jaguar, ocelot, key deer, grizzly bear, red wolf, and the California condor, are just a few of the many species of birds and animals that face an uncertain future with deforestation.[35] On some federal lands, the majority of mature and old-growth forests are pinyon and juniper woodlands, which provide habitat for the ferruginous hawk, juniper titmouse, mountain bluebird, American kestrel, black-throated gray warbler, dusky flycatcher, fringed myotis, pallid bat, white-tailed antelope squirrels, Apache pocket mice, desert woodrats, kit foxes, ringtails, white-backed hog-nosed skunks, northern sagebrush lizard and dozens more. Additionally, pinyon and juniper woodlands are essential habitats for mule deer, elk, pronghorn, and white-tailed deer. The threats to these animals from deforestation are nationwide, as currently there are planned logging projects in multiple locations.[36] If these logging projects proceed, thousands of acres of trees, some as old as two hundred years, will be removed. Removal will eradicate the canopy and understory that provide habitat for countless species of plants, birds, and wildlife, including some classified under the Endangered Species Act (ESA). Removal of forest land will make the loss of critical habitat and species an even more immediate reality, and the Forest Service should consider

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[33] United States Department of Agriculture, Forest Service, *Telephone Gap Integrated Resource Project Notice of Proposed Action and Opportunity to Comment*, January 2023, p. 34.

[34] "America's Vanishing Climate Forests; How the U.S. is Risking Global Credibility on Forest Conservation," November, 2022, https://www.climate-forests.org/_files/ugd/ae2fdb_b5a2315e3e8b42498b4c269730c3955a.pdf (accessed February 1, 2024).

[35] Sheereen Othman, *These Animals are Disappearing from North American Forests,* June 19, 2018 https://arbordayblog.org/replanting-our-national-forests/these-animals-are-disappearing-from-north-ameican-forests (accessed January 26, 2024 and attached in pdf format).

[36] "America's Vanishing Climate Forests; How the U.S. is Risking Global Credibility on Forest Conservation," November, 2022, https://www.climate-forests.org/_files/ugd/ae2fdb_b5a2315e3e8b42498b4c269730c3955a.pdf (accessed February 1, 2024).

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alternatives in the EIS that do not include the removal of trees and, instead, emphasize the protection of old-growth and mature forests.

Removing mature and old-growth trees also causes indirect effects that diminish biodiversity and adversely affect the forest habitat. Forests capture water and moisture, filtering water as it travels to the soil. Deforestation reduces the water-regulating effect of trees, leaving exposed soils vulnerable to erosion and runoff, removing vital nutrients for other plant life, and introducing sediments and pollutants into the nearby water sources. Deforested regions also lose the beneficial effects trees have on the air quality through intercepting particulate air pollution and absorbing harmful gases such as nitrogen dioxide and ozone.

Additionally, tree removal operations may require building or expanding roads to transport people, equipment, and removed trees. These roads and other logging facilities, such as buildings, disrupt wildlife movement, create sound pollution that can cause stress, limit animal communication, and remove cover upon which animals rely. An example is the woodland caribou, found in the North American west in the U.S. and Canada.[37] Due to increased logging, scientists removed the last known member of the species to habitually cross into the U.S. from Canada in 2019 for conservation purposes.[38] This threat continues, as future planned logging projects include 54,883 acres of potential commercial logging of mature and old-growth trees in the Bitterroot National Forest, where there is an active program to reintroduce grizzly bears to their native habitat.[39] It's counterintuitive to reintroduce species while failing to protect the habitat necessary for their successful survival.

Benefits to biodiversity and ecosystem health will only be realized if deforestation is stopped. While the Forest Service acknowledges the errors in past government actions that utilized deforestation as a tool, the Draft EIS includes numerous exceptions to minimizing logging that will still allow for the removal of old-growth and mature trees. It is counterintuitive to utilize forest destruction to protect the forest. The Forest Service must consider alternatives that promote the preservation and expansion of old-growth and mature forests, not just for the benefit of the forests, but the wildlife that relies on healthy forests for survival.

In the Draft EIS, the Forest Service provided no in-depth analysis of the effects that any of the proposed alternatives will have on wildlife species. The Draft EIS that they have

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[37] *Logging -Free Forests are Critical for Threatened Wildlife*, https://www.wilderness.org/articles/blog/logging-free-forests-are-critical-threatened-wildlife, December 20, 2021 (accessed January 25, 2024).
[38] *Id*.
[39] "America's Vanishing Climate Forests; How the U.S. is Risking Global Credibility on Forest Conservation," November, 2022, https://www.climate-forests.org/_files/ugd/ae2fdb_b5a2315e3e8b42498b4c269730c3955a.pdf (accessed February 1, 2024).

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initiated conversations with the U.S. Fish and Wildlife Service and National Marine Fisheries Service and concluded that an ESA Section 7 consultation was not warranted.[40] The Forest Service stated, "direct impacts stemming from projects implementing the amendment would be analyzed at the project level. [41] Continued deforestation does not benefit biodiversity and the health of the ecosystem. The Forest Service must consider and analyze the effects logging operations will have on the environment and animals throughout the nation's forested regions in the rulemaking and adopt rules that eliminate further destruction.

C. Old-growth and mature forests are more resilient to wildfires.

For many years, the Forest Service managed our nation's forests through logging, championing the purported benefits of thinning forests in response to high density or pest infestation while reaping the financial benefits from selling the logged trees.[42] The policy was based on the premise that logging would thin forest density and prevent high-intensity fires, allowing for the growth of younger and smaller trees believed to burn at a lower intensity than mature and old-growth trees. In the Draft EIS, the Forest Service states that its current position is that the best method to preserve forest land is "proactive stewardship in order to protect old-growth forests from threats, including to reduce wildfire risk and allow for the restoration of beneficial fire in fire-adapted ecosystems."[43]

Prescribed fire and vegetation treatment should not be tools for managing forests. Mature and old-growth forests are more tolerable to fires than the Forest Service acknowledges and benefits from periodic mixed-intensity fires. For instance, in pockets of sequoias, fire will melt resin in sequoia cones and release tens of thousands of seeds. With sunlight exposure, young sequoias can thrive and become mature trees. Logging, vegetation treatments, and prescribed burns inhibit the natural cycle of mixed-intensity fire that promotes healthy forests, which should be the primary goal of the Forest Service in amending 128 management plans nationwide.

The Forest Service should consider alternatives that protect not only mature and old-growth trees, but also younger trees, taking a more comprehensive view of the forest as a whole. The Forest Service previously noted that wildfires are a major threat to the nation's old-growth and mature forests.[44] While the Forest Service states that timber harvesting has been reduced from the past, it also acknowledges that past management methods that allowed the cutting of old-growth and mature forests have left the forests depleted and

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[40] Draft EIS, p. S-11.
[41] Draft EIS, p. S-12.
[42] Chad Hanson, *Opinion: We've Got it All Wrong About Sequoias and Wildfire*, July 5, 2023, https://www.latimes.com/opinion/story/2023-07-05/sequoia-wildfire-sierra-nevada-california-forest-service-logging (accessed January 29, 2024 and attached in pdf format).
[43] Draft EIS p. S-2.
[44] *Id*.

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scarred.[45] Failing to protect mature and old-growth trees and implementing management plans that remove more trees will not assist in replenishing these depleted and scarred forests. But, no longer removing mature and old-growth forests and allowing younger trees to mature will replenish the forests and result in forests more resilient and better able to withstand increased wildfires attributed to climate change. Land plans that remove trees are not the solution, as prescribed burns and vegetation treatment will remove a valuable resource in supporting ecosystems more resilient to wildfires. As a forest matures, allowing larger trees to capture and store more carbon, the understory thrives as shady undergrowth that prevents erosion and provides moisture and nutrients to the soil through dead logs and other decomposing plant life that do not easily ignite, promoting a less combustible forest environment.[46]

Friends of Animals encourages the Forest Service to consider alternatives that do not require the removal of forest resources for purported management purposes. Prescribed burns or vegetation treatments in which healthy forests are thinned or decreased in density should not be considered as alternatives. In old-growth forests, planning must be for the purpose of "proactive stewardship" to allow for resilient old-growth forests that can able to adapt to current stressors and future environmental conditions.[47] Under the Draft EIS, removal of old-growth trees (not mature trees) is minimized, although exception exist to reduce fuel hazards to protect from wildfire, protect public health and safety, comply with statutes or regulations, address culturally significant uses, or address management when it is determined that the planning amendment is not relevant or beneficial.[48] Rather than leaving the decision of whether to remove trees to the discretion of the "responsible official" and the vague situations in which tree removal may be allowed, the Forest Service should exercise "proactive stewardship" and consider alternatives that do not allow for the removal of old-growth and mature trees except in very clear circumstances, limited only to situations in which it is necessary to prevent the spread of an active wildfire.

CONCLUSION

Friends of Animals thanks the Forest Service for the opportunity to comment and provide input on the Forest Service's Draft EIS for amending Land Management Plans throughout the National Forest System. Forests serve both as a carbon sink, capturing and containing carbon, and the proverbial canary in the coal mine, telegraphing through its distressed condition the dramatic and catastrophic effects of climate change. Forests also serve as the home to countless animals. The Forest Service acknowledges that old-growth and mature

[45] Draft EIS p. S-4.
[46] Norm Christenson and Jerry Franklin, *New Trees are No Substitute for Old Trees*, June 11, 2023, https://www.politico.com/news/magazine/2023/06/11/to-fight-wildfire-our-forests-need-to-grow-old-00101360 (accessed January 29, 2024).
[47] *Id.*
[48] Draft EIS, p. 117.

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forests are at risk from wildfires caused by climate change. However, the solution is not to create land plans that utilize prescribed burns and vegetation management; instead, it is to place a moratorium on the removal of trees. Old-growth and mature forests provide habitat for wildlife, are resistant to wildfire, and provide the carbon capture and sequestration necessary to combat climate change. The Federal Government is aware of the importance of the nation's forests and has reversed course in the past when logging was contrary to the nation's interests. Examples include the reversal of a Trump-era rule to open logging in the Tongass National Forest in Alaska, eliminating logging on approximately 9 million acres of the world's largest intact temperate rainforest, and withdrawing a plan to log 800 to 1,000 acres of mature forest in the Willamette National Forest because the plan was "incongruent with recent directives and climate-related plans concerning conservation of mature and old-growth forests and carbon stewardship."

Friends of Animals urges the Forest Service to focus on protecting mature and old-growth forests, take a hard look at the dire environmental consequences of the proposed discretionary proactive stewardship, and consider the reasonable alternatives of prohibiting all logging of old-growth trees or the removal of any trees in old-growth stands. These forests are critical for their carbon capture, absorption, and storage capabilities; for promoting a healthy and diverse ecosystem; for combating biodiversity loss and providing homes to countless animals; and for providing a defense against climate change-based drought and fires. Thank you for the opportunity to comment, and please contact me if you have any questions or if I can provide additional information.

Sincerely,

Jennifer Best
Director, Wildlife Law Program
Friends of Animals
7500 E. Arapahoe Rd., Suite 385
Centennial, CO 80112
jennifer@friendsofanimals.org