



September 18, 2024

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

Dear Chief Moore,

Great Old Broads for Wilderness is a women-led national grassroots organization that works to preserve and protect wilderness and wild lands. Our 500 members and supporters across the Pacific Northwest include a diverse range of experience and expertise. We value the ecosystem services our forested public lands provide and the legacy they represent for our grandchildren and all Americans in the future.

Please accept these comments on the Draft Environmental Impact Statement for the proposed amendment to National Forest plans regarding mature and old-growth forest protection on behalf of our six Pacific Northwest chapters (i.e. “Broadbands”): Rogue Valley (southern Oregon), Willamette Valley (Salem to Eugene Oregon), Bitterbrush (Central and Eastern Oregon), Cascade-Volcanoes (Portland area and Southwestern Washington), Salish Sea (Northwestern Washington), and Polly Dyer (Seattle).

***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.

### ***The National Old-Growth Amendment must recognize the differences between moist and dry forests in the Pacific Northwest***

The dry forests of the interior West have an entirely different fire regime than the moist temperate rainforests along the coast from southeast Alaska to northern California. Both moist and dry forests in the Pacific Northwest were heavily logged during the twentieth century, leaving relatively few mature and old-growth stands still standing.

- **Vague references to thinning forests for “fuel reduction” and “proactive stewardship”** could put both moist and dry mature forests at risk of increased commercial harvest. Thinning overstocked forests can be a useful tool to reduce fuel in some dry forests and in tree plantations, **as long as mature and old-growth trees are not cut down.**

- **Thinning in mature moist, westside forests is a veiled excuse to increase commercial logging.** In the mature moist forests of western Oregon and western Washington, the risk of wildfire cannot be addressed by thinning. Our rainy westside forests are among the most productive in the world and they naturally store huge amounts of biomass (ie. carbon.) Thinning mature **moist** forests reduces biomass, compresses soil, accumulates unnaturally high levels of woody fuel, and opens the forest floor to rapid drying. All of this *increases* fire susceptibility, *releases* carbon into the atmosphere, and *reduces* shelter for sensitive species. Dr. Beverly Law (2021) states that west of the Oregon Cascades there is no scientific basis to attempt to reduce fuels as they just grow back rapidly and it is not possible to reduce their flammability.

- **Thinning is not only not needed, it is destructive in moist forests.** Fire in moist westside forests is a matter of weather, moisture, and wind, not fuel load.

***The Great Old Broads for Wilderness supports Alternative 2, with the following modifications:***

- The DEIS fails to adequately protect mature trees and forests. **Mature trees must be protected** from the threat of commercial logging in order to recover old growth that has been lost to past mismanagement. They must be protected to aid in the fight against worsening climate change and rampant biodiversity loss. And they must be protected to ensure that children in the future are able to experience the wonder of an old-growth forest ecosystem.
- **No commercial harvest of mature and old-growth trees** should be permitted, as these are often the most fire-resilient and provide the most carbon storage for climate mitigation. Mildrexler et al. (2020) found that the 4% of mature and old-growth trees in their study area in eastern Oregon and Washington store 41% of the carbon.
- **No post-fire logging should be permitted** in old-growth stands or in mature stands designated for recruitment to old-growth conditions. Donato et al. (2006) maintain that post-fire logging is detrimental to long-term forest development, wildlife habitat and other ecosystem functions. Most of the carbon is preserved and natural recovery can occur without the disturbance of logging on fragile soils.
- With appropriate review, thinning could be used in overstocked **dry** forests or in tree plantations. However, thinning should never occur in mature or old **moist** forests in the Pacific Northwest.
- With appropriate review, commercial timber sales could follow thinning in overstocked **dry** forests or tree plantations, but there should be absolutely no commercial sales of mature or old-growth trees.
- The DEIS focuses on “proactive stewardship” to speed the development of old-growth characteristics. This strategy is useful only for tree plantations and should **not** be applied to **moist** mature and old-growth forests, because these older forests are already well on their way

toward (or have already become) old-growth and the stress of intervention will delay or harm natural forest development.

- Proactive stewardship in mature and old-growth **dry** forests could include invasive plant removal, thinning small trees, or limbing trees to reduce the risk of canopy fires. Proactive stewardship in mature and old-growth **moist** forests should be strictly limited to invasive plant removal, without thinning or limbing.
- In the Ecological Services section, the DEIS recognizes that “old-growth forests contribute to carbon sequestration by storing large amounts of carbon in their biomass and soil, thereby mitigating climate change.” This fact should be more thoroughly incorporated throughout the document. Mature and old-growth forests aren’t just victims of climate change. They are an opportunity to fight climate change.
- Standard 2.b allows for cutting old-growth forests when “incidental to the implementation of a management activity not otherwise prohibited.” This standard is vague and creates a large loophole that is contrary to the purpose of the amendment and Executive Order 14072. This standard should be removed from the final amendment.
- We request modification of Guideline 3 (Table 1), regarding the protection of old-growth trees located in younger stands. To properly recognize the ecological importance of such trees, change the phrase “To preserve the cultural and historical value of old trees” to, “To preserve the cultural, historical and *ecological* value of old trees occurring outside of mature and old growth forests...:” Add, “These older trees and large snags should be left uncut in plantation timber harvests.”
- The section on water quality and quantity in the DEIS states that “old-growth forests are highly retentive of nutrients. Since nutrients are retained in live vegetation, decomposing plant materials and soils, there is less transport of nutrients in surface runoff, leading to generally higher water quality originating from old-growth forests.” Segura et al (2020) evaluated the long-term impact of forest harvest on summer low flow deficits in the Oregon Coast Range; the study found streamflow was 50% lower in a 40-43-year old plantation relative to a 110-year-old forest. We request that the Final Amendment emphasize that older forests retain water and release it slowly, providing longer summer stream flows than found in younger forests. As climate change alters precipitation patterns, the Pacific Northwest experiences hotter and drier summers; thus, protecting older forests protects downstream municipal water users as well as forest ecosystems.

**In summary**, we urge you to take this opportunity to protect our older trees and forests. Failure to do so undermines the objectives of this amendment, contravenes the direction of EO 14072, and ignores more than half a million public comments the agency received on last summer’s advance notice of proposed rulemaking.

The Great Old Broads for Wilderness chapters of the Pacific Northwest appreciate the opportunity to provide comments on the proposed amendment to better protect old-growth forests. We look forward to seeing a final plan that has strong protections for mature and old-growth trees and forests.

Sincerely,

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