



September 19, 2024

Comments on the Draft Environmental Impact Statement for the National Old Growth Amendment

Dear U.S. Forest Service:

Trees older than our country are being hauled out of the forest on logging trucks as we speak.

The Brushy Mountain timber sale is logging old growth in North Carolina's Pisgah and Nantahala National Forest right now. And the proposed National Old Growth Amendment would allow more Brushy Mountains to occur.

The draft amendment utterly fails to protect old growth.

The current draft of the National Old Growth Amendment will allow old growth logging projects on the Pisgah and Nantahala National Forests – and forests across our state and country.

Only 1% of old growth remains in the East. The Forest Service's draft amendment does protect the last 1% of existing old growth in the East.

That seems like a basic first step for a National Old Growth Amendment: protect what little you have left, safeguard the last scraps of old growth.

Inexplicably, the National old Growth Amendment does not prohibit cutting down old growth trees and forests.

Instead, all old growth is potentially subjective to proactive stewardship. The Forest Service believes that all forests, including old growth forests, need to be actively managed and manipulated. Actively managed forests are help the Forest Service meet timber targets.

This is a fundamental flaw in the amendment and the Forest Service as an institution.

The Forest Service does not seem to acknowledge the value of allowing old growth forests function naturally.

The term “passive” management or an equivalent phrase is simply not found anywhere in the DEIS. Instead, the only option for old growth is “proactive stewardship,” defined as “vegetation management that promotes the quality, composition, structure, pattern, or ecological processes necessary for old-growth forests to be resilient and adaptable,” and “vegetation management” in turn is defined as a list of active “treatments.”

Some areas—not all, but some key areas like the last 1% of old growth forests in the East—should be passively managed, should be allowed to function naturally, and should be protected from logging.

That includes the 12,000 acres of old growth in the Nantahala and Pisgah National Forests that remain unprotected and placed in high-priority logging designations by the new forest plan.

That includes thousands of acres of old growth in Big Ivy section of Pisgah / Craggy National Scenic Area – a 16,000 acre oasis of waterfalls, trout streams, rare and endangered species, and ancient trees just 19 miles from downtown Asheville. It is poised to become North Carolina’s first National Scenic Area. But thousands of acres of old growth in Craggy remain vulnerable, and this amendment will do nothing to protect that old growth.

This amendment legitimizes the cutting of old growth forests. That is the opposite of what Biden’s executive order intended and the opposite of what most forest users want.

Nearly all of forest users in the North Carolina’s national forests are hikers, mountain bikers, paddlers, climbers, nature photographers, dog walkers, everyday folks who want to see more of the forest protected, not proactively logged. We go to the forest to feel something larger, to feel the presence of ancient trees and deep connections. That is what we are fighting for.

It takes a century for a forest to become old growth—a century of stored carbon, helping to mitigate climate change; a century of providing clean water; of providing habitat for wildlife; and magnificent places to hike and explore.

But as we are seeing at Brushy Mountain, it takes just a few weeks to cut down an old growth forest.

We’ve lost most of our old growth in the East, but we still have a lot left worth fighting for and protecting.

Our old growth forests in North Carolina protect hundreds of rare and imperiled species, including several endangered species – Carolina northern flying squirrels, four federally listed bats, and endangered mussels that filter our water and keep rivers clean.

North Carolina and the Southeast is also a global biodiversity hotspot. It is the salamander capital of the world. There are more species of salamanders found here than anywhere else on the planet. This region is also a global hotspot for freshwater fish, snails, and mussels.

And they all depend on lush, mature and old growth forests.

The Forest Service's draft proposal does not protect old growth. It would allow old growth to be logged through many loopholes and allowances such as proactive "stewardship"

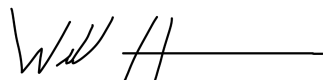
The proposal wouldn't prevent more timber sales like Brushy Mountain.

The Forest Service can and must do better. We urge the Forest Service to finalize a strong policy that prohibits the commercial sale of old growth and closes the many bulldozer-sized loopholes and exceptions that make it easier to log our last remaining old-growth forests.

There is no ecological reason to log old growth forests. There is no good reason at all to cut old growth forests.

They are worth far more standing than cut down.

Sincerely,

A handwritten signature in black ink, appearing to read "Will Harlan", followed by a horizontal line extending to the right.

Will Harlan
Southeast Director
Center for Biological Diversity