

The Honorable Randy Moore
Chief, U.S. Forest Service
United States Forest Service Sidney R. Yates Federal Building 201 14th St SW
Washington, DC. 20227

Dear Chief Moore,

The Women's Earth and Climate Action Network (WECAN) submits this comment on behalf of our nationwide members and supporters. Our input addresses the U.S. Forest Service's National Old-Growth Amendment (NOGA) Draft Environmental Impact Statement (DEIS), which aims to amend land management plans to guide Old-Growth forest conditions across the National Forest System. Properly implemented, this national amendment could significantly address the climate and biodiversity crises. It also has the opportunity to positively affect human-forest interactions by protecting cultural practices, recreation, and local businesses that rely on thriving Old-Growth and Mature forest conditions. To address these topics, NOGA must be made in line with the goals and desired outcomes of Executive Order (EO) 14072.

As written, none of the alternatives in the DEIS prohibit logging of Old-Growth forests, including Alternative 3 which is considered the most restrictive. While Alternative 3 does include a provision that "prohibits commercial timber harvest in Old-Growth," it still allows for the felling of Old-Growth trees. In the rare circumstance where Old-Growth trees must be cut due to public safety or a similar issue, the tree should be prohibited from a commercial exchange, as listed in Alternative 3, to restrict economically incentivized forest management. To fully strengthen our Nation's forests and be in alignment with EO 14072, the final NOGA decision should end the cutting and selling of Old-Growth trees on public lands, as effective management can take place without the commercial exchange of these trees.

The Forest Service must use NOGA to implement transformational change with strengthened language and standards that allow the amendment to have enforceable protections over both Old-Growth and Mature trees and eliminate their commercial exchange. Historically, the nation's Old-Growth forests have drastically declined due to centuries of logging, emphasizing the significance of Mature forest protection. The Forest Service defines Mature trees as, "the stage of forest development immediately before old growth,"¹ meaning that they are the Old-Growth of the future. While they may not contain all of the structural attributes of Old-Growth forests, Mature trees offer significant climate and biodiversity benefits due to their shared attributes with Old-Growth trees.² Protecting Mature forests from logging (tree cutting) helps to avoid historical logging patterns as noted by the Forest Service's Threat Analysis as a major disturbance

¹ Forest Service and Bureau of Land Management. "Mature and Old-Growth Forests: Definition, Identification, and Initial Inventory on Lands Managed by the Forest Service and Bureau of Land Management." 2023, <https://www.fs.usda.gov/sites/default/files/Mature-and-Old-Growth-forests-tech.pdf>

² Climate Forests. "America's Vanishing Climate Forests: How the U.S. Is Risking Global Credibility on Forest Conservation." 2022, https://www.climate-forests.org/files/ugd/ae2fdb_b5a2315e3e8b42498b4c269730c3955a.pdf. Accessed 17 June 2024.

historically and an ongoing threat today.³ As stated in the DEIS, these past management practices “contributed to current vulnerabilities in the distribution, abundance, and resilience of Old-Growth forest characteristics.”⁴ To ensure we have Old-Growth forests in the future, we must protect today's Mature forests, which will develop into and rebuild the number of Old-Growth stands that have been destroyed. The DEIS explains, “Mature forests across the National Forest System suggests that many of these lands have the inherent capability to sustain Old-Growth forests into the future,”⁵ but they cannot do this without explicit protections that enable them to age into Old-Growth. Including standards for Mature forest protection in the National Old Growth Amendment would allow National forests with virtually no Old-Growth left, due to logging, to build back with Mature trees, which are crucial in the defense against the climate and biodiversity crises.

As identified on the EO 14072, Mature and Old-Growth Forests (MOG) are essential in protecting against climate and biodiversity crises. Studies have found that MOG sequester vast amounts of carbon in their trunks, branches, and soil; sustain biodiversity, especially threatened and endangered species; and uphold ecological integrity by maintaining hydrological cycles and acting as climate and fire refugias.⁶ Studies show that the United States was inadequately attaining its NDC climate commitment of reducing greenhouse gas emissions.⁷ To remedy this and help reach the U.S.’s commitment and The Paris Agreement’s international climate target of limiting global warming to 1.5 °C,⁸ it is necessary that the United States Forest Service (USFS) create durable protections for these climate-regulating forests. The final NOGA decision should detail the protection of MOG for climate and carbon mitigation. To align with the EO 14072 and ensure these forests can provide climate and biodiversity resilience, the USFS must include protective standards for Mature forests and strengthen protections for Old-Growth forests against logging and commercial exchange.

³ Forest Service and Bureau of Land Management. “Introductory Report. Analysis of Threats to Mature and Old-Growth Forests on Lands Managed by the Forest Service and Bureau of Land Management.” 2024, https://www.fs.usda.gov/sites/default/files/fs_media/fs_document/MOG-Threats-Intro.pdf. Accessed 17 June 2024.

⁴ U.S. Forest Service. “Amendments to Land Management Plans to Address Old-Growth Forests Across the National Forest System: Draft Environmental Impact Statement.” 2024, <https://www.fs.usda.gov/project/?project=65356>. Accessed 06 August 2024.

⁵ U.S. Forest Service. “Amendments to Land Management Plans to Address Old-Growth Forests Across the National Forest System: Draft Environmental Impact Statement.” 2024, <https://www.fs.usda.gov/project/?project=65356>. Accessed 06 August 2024.

⁶ DellaSala, Dominick A., et al. “Mature and Old-Growth forests contribute to large-scale conservation targets in the conterminous United States.” *Frontiers in Forests and Global Change*, vol. 5, 2022, <https://www.frontiersin.org/articles/10.3389/ffgc.2022.979528/full>. Accessed 17 June 2024.

⁷ Davis, Stacey. “The U.S. is behind on its climate commitments. Here’s how the Biden Administration can close the gap.” *Clean Air Task Force*, 2023, <https://www.catf.us/2023/04/the-u-s-is-behind-on-its-climate-commitments-heres-how-the-biden-administration-can-close-the-gap/> Accessed 30 August 2024.

⁸ United Nations. “The Paris Agreement: What is The Paris Agreement?” <https://unfccc.int/process-and-meetings/the-paris-agreement#:~:text=To%20limit%20global%20warming%20to%201.5%C2%B0C%2C%20greenhouse%20gas,%2D%2D%20carried%20out%20by%20countries.> Accessed 06 August 2024.

Also identified in the EO 14072, intact MOG are critical to human-forest relations for the cultural integrity of Indigenous peoples, recreation, and local economies. MOG has underpinnings in Indigenous languages, spiritual beliefs and practices, and creation stories⁹ making them keystone structures both ecologically and culturally. With MOG providing critical habitat and food sources to sustain diverse wildlife populations, they, in turn, provide sustenance that Indigenous and local communities rely on, such as salmon and deer.¹⁰ In the final NOGA decision, co-stewardship with Indigenous leaders and tribal nations should be included to ensure long-term ecological and cultural integrity. Similarly, healthy, intact MOG ecosystems give way to thriving local economies based on visitor industries, wild subsistence harvesting, and recreation. Studies show that communities located in regions with MOG receive economic benefits that support local businesses and jobs within wilderness recreation, hunting and fishing, and non-timber products.^{11 12}

The Tongass National Forest (“Tongass”) is one of the Nation’s largest intact Old-Growth forests where forest-based communities, such as Tlingit and Haida, and industries, such as commercial fisheries, heavily rely on thriving MOG ecosystems.¹³ Because of this, we support the culturally significant uses exception that allows Tribal members to continue the selective cutting of trees for cultural traditions and their ways of life. Studies show that the Tongass alone sequesters extensive amounts of carbon and nurtures threatened species, such as the marbled murrelet seabird.¹⁴ With the Tongass leading climate and biodiversity protection and sustaining Indigenous communities and local businesses, the USFS must strengthen language to prohibit commercial harvesting of MOG in the Tongass National Forest. We raise concerns for the “de minimis use for local community purposes”¹⁵ in the preferred alternative because it is an undefined language that could enable large-scale commercial harvesting of old-growth in the

⁹ Pearce, Fred. “Tree Keepers: Where Sustaining the Forest Is a Tribal Tradition.” *Yale Environment* 360, 2023, <https://e360.yale.edu/features/menominee-forest-management-logging>. Accessed 17 June 2024.

¹⁰ Sitka Conservation Society. “The Tongass National Forest: America’s Climate and Salmon Forest.” 2022, https://www.sitkawild.org/about_the_tongass#:~:text=The%20health%20of%20the%20old.safe%20spawning%20habitat%20for%20salmon. Accessed 17 June 2024.

¹¹ The Wilderness Society. “What are Old-Growth forests and why do they matter?” 2023, <https://www.wilderness.org/articles/blog/what-are-Old-Growth-forests-and-why-do-they-matter>. Accessed 17 June 2024.

¹² Krieger, Douglas J. “The Economic Value of Forest Ecosystem Services: A Review.” *The Wilderness Society*, 2021, <https://www.sierraforestlegacy.org/Resources/Conservation/FireForestEcology/ForestEconomics/EcosystemServices.pdf>. Accessed 17 June 2024.

¹³ Earthjustice. “Alaska Native Tribes, Southeast Alaska Businesses and Forest Advocates Defend Tongass National Forest’s Roadless Rule.” 2024, <https://earthjustice.org/press/2024/alaska-native-tribes-southeast-alaska-businesses-and-forest-advocates-defend-tongass-national-forests-roadless-rule>. Accessed 17 June 2024.

¹⁴ Cannon, John. “End Old-Growth logging in carbon-rich ‘crown jewel’ of U.S. forests: Study.” *Mongabay*, 2022, <https://news.mongabay.com/2022/06/end-Old-Growth-logging-in-carbon-rich-crown-jewel-of-u-s-forests-study/>. Accessed 17 June 2024.

¹⁵ U.S. Forest Service. “Amendments to Land Management Plans to Address Old-Growth Forests Across the National Forest System: Draft Environmental Impact Statement.” 2024, <https://www.fs.usda.gov/project/?project=65356>. Accessed 06 August 2024.

Tongass. The USFS should define or remove this language in the final decision to ensure the objectives of this policy are met and that MOG in the Tongass are protected from commercial logging. To follow the EO 14072 in honoring Tribal-treaty rights and promoting sustainable economic development and outdoor recreation, the final NOGA decision must also provide protections for the Tongass beyond the Southeast Alaska Sustainability Strategy (SASS), which is neither enforceable nor durable as it can be modified or eliminated under a new administration. Therefore, the final policy decision of NOGA should be de-coupled from SASS.

To align with EO 14072 by providing protections for Mature and Old-Growth Forests across all National Forest Systems, the NOGA must incorporate robust monitoring and accountability measures to ensure transparency and ability to track MOG metrics, such as abundance, distribution, carbon sequestration over time, and other means of evaluation. Through secure monitoring and accountability, it would also be beneficial for long-term protections to include MOG co-stewardship with Indigenous partners, especially with Indigenous Knowledge being recognized as a sound method for forest management decisions by the Bureau of Land Management¹⁶ and being recognized within EO 14072. The final decision should establish accountability protections to ensure that management does not allow old-growth forests to be managed out of 'old-growth status,' therefore building the durability of NOGA protections. Similarly, NOGA must remove all exceptions to logging (tree cutting) that may allow financial incentives by incorporating strengthened language and enforceability. To guarantee explicit monitoring, accountability, and enforceability, the definitions in the final NOGA decision should provide a consistent approach across all National Forest Systems.

As the USFS comes to the final National Environmental Policy Act procedures for the National Old Growth Amendment, it is critical that the goals of Executive Order 14072 are met to ensure that Mature and Old-Growth Forests can aid in climate and biodiversity crisis prevention, while also positively affecting human-forest relations through the promotion of Indigenous cultural integrity, recreation, and local economies. To best meet these goals, WECAN and our supporters encourage the USFS to implement the prohibition of commercial exchange of Old-Growth across all National Forest Systems, create standards and protections for Mature forests, implement co-stewardship with Indigenous leaders, strengthen language for Tongass National Forest protections, and incorporating robust monitoring and accountability measures for climate and forest management.

Thank you for the opportunity to provide feedback on the Draft Environmental Impact Statement for the National Old-Growth Amendment.

Sincerely,
Women's Earth and Climate Action Network

¹⁶ Bureau of Land Management. "Public Lands Rule." 2024, <https://www.blm.gov/public-lands-rule>. Accessed 17 June 2024.