



September 19, 2024

Via Electronic Portal

Randy Moore, United States Forest Service Chief
United States Department of Agriculture
1400 Independence Ave. SW
Washington, DC 20250

Dear Chief Moore,

On behalf of Central Oregon LandWatch, our 900+ members, and the 521 old-growth supporters who have signed this petition, please accept the following comments on the Draft Environmental Impact Statement (DEIS) on Amendments to Land Management Plans to Address Old-Growth Forests Across the National Forest System.

In Central Oregon, we are fortunate to be surrounded by forest lands, from the Deschutes and Ochoco National Forests in our backyard, to the lush Willamette National Forest just over the Cascade Crest, to the rugged Fremont-Winema National Forest to the south. These forests support our communities in myriad ways, and we benefit especially from the mature and old-growth forests that keep streams clean, store carbon, provide habitat, and offer wildfire resilience. Mature and old-growth forests are critical not only to our way of life as Central Oregonians, but to the well-being of communities spanning the country. They deserve robust, lasting protection as a core component of forest management nationwide.

Executive Order 14072 directed the Forest Service to meaningfully improve such protections for mature and old-growth trees, but the DEIS on amending the nation's forest plans falls far short of this goal. The proposal still allows old-growth trees to be sent to the mill and lets agency staff manage old-growth out of existence in pursuit of "proactive stewardship" goals.

The DEIS also fails to protect mature trees. Mature forests and trees must be protected to counteract past mismanagement, to mitigate the worsening climate crisis, to stem rampant biodiversity loss and, ultimately, to become future old-growth. Where old-growth has been lost to logging, mature trees provide important large tree structure and serve a similar role as old-growth in filtering water, regulating temperature, and sheltering wildlife. They are also essential for carbon storage and sequestration; in Central and Eastern Oregon, the largest 3% of trees store 42% of our forest carbon. The DEIS does not go nearly far enough to preserve all of these benefits, and the final record of decision should:



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

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

East of the Cascade Mountains, the fight to protect mature and old-growth trees has been long and hard-won, and our own Ponderosa giants deserve protections that should equally extend to southeast Alaska's Sitka spruce, coastal California's redwoods, and North Carolina's longleaf pines. Failure to meaningfully protect mature and old-growth forests undermines the stated objectives of this amendment, contravenes the direction of EO 14072, and ignores more than half a million public comments the agency received on the advance notice of proposed rulemaking in 2023. We urge you to take this opportunity to safeguard the oldest trees and forests throughout the National Forest System, and to ensure that future generations – in Central Oregon and across the United States – benefit from all that old-growth forests can provide.

Sincerely,



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