



GREENLATINOS
Luchando por la Liberación Ambiental

Dear Chief Moore and USDA Staff and Leadership,

GreenLatinos is an active community of Latino leaders emboldened by the power and wisdom of our culture, united to demand equity and dismantle racism, resourced to win our environmental, conservation, and climate justice battles, and driven to secure our political, economic, cultural, and environmental liberation.

We thank you for the opportunity to advance the stewardship of old growth forests for posterity. We comment on this imperative to steward old-growth for future generations from a cultural standpoint as well as an environmental justice standpoint.

Latino/a/e and Hispanic cultures are diverse. As an ethnic community many facets of identity shape our cultures and traditions, but a few shared values cross cultural differences. One of them is that our cultures encourage *respect for our elders* and value intergenerationality. It is of utmost importance for Latino communities then, that our nation acts to respect some of the most elder among us—our old-growth forests—by protecting them from commercial threats to their health or their persistence.

Some of the non-material values that old-growth forests retain for our communities include awe and inspiration that old-growth forests offer to visitors who behold their age, and their persistence in our communities throughout numerous human generations. Those non-material values are most meaningfully obtained through direct personal experience in old-growth forests, especially through non-invasive forms of recreation like walking, camping, picnicking, wildlife watching, fishing, and hunting. For this reason we are disappointed to see that the DEIS did not make an analysis of, or further recommendation for future analysis of, nature deprivation rates in Forest Service footprint communities.

Beside the substantial material benefits that healthy persistent old and mature growth forest ecosystems provide for public health, non-material values are crucial to realizing the full benefit of well stewarded old growth forests. In particular, the mental and physical wellness benefits afforded to people when they spend time in natural areas are those that cannot be substituted through other means of receiving these benefits, especially at the unique magnitude of benefits like clean air, quietude, exercise, biodiversity, dark skies and emotional response elicited in the beholding of old-growth trees provided by old-growth forests. Communities cannot realize those benefits if they live in the “nature gap” and do not have adequate means of enjoying these forests. It is not enough to state that the Forest Service’s Climate Risk Viewer Fireshed map containing data layers for Census tracts that are considered disadvantaged or vulnerable “is

available for future project-level analysis to consider the distribution of risks and benefits from Agency Management actions.” We encourage the Forest Service to analyze nature deprivation as related to forest system areas with old and mature growth characteristics include specific recommendations for the Amendment to ameliorate nature deprivation in footprint communities and adjacent communities, especially among those living in environmental justice census tracts, in the final EIS.

Old growth forests and fallen trees are some of the most effective actors for carbon sequestration, wildlife habitat, and other crucial ecosystem services which especially benefit frontline communities. U.S. forests supply drinking water to over 150 million people, serving as a vital lifeline for communities through droughts and changing precipitation patterns. As such we strongly support the intent of Executive Order 14072 and the National Old-Growth Amendment, and appreciate the recognition by the Forest service that “just treatment” requires analyzing and addressing both the potential for adverse affects on human and ecosystem health by any proposed action but also “ensuring equitable access to the environmental benefits of Agency actions.” We commend the DEIS for calling attention to data that Hispanic/ Latino identified residents constitute 25.5 percent of National Forest Service footprint counties. Although it is noted that public engagement so far has not noted unique relationships between this identity group and old-growth forests, it should be noted that our shared cross-cultural values for our elders does compel a deep respect and reverence for old-growth among Hispanic and Latino community members. As such we do not support provisions in NOGA-FW-STD-02b as part of alternative 2 that would allow for the cutting or removal of old-growth trees for incidental infrastructure such as a road, pipeline, transmission line or ski area run and recommend that NOGA-FW-STD-02b is struck from the alternative in its entirety.

We are pleased to see the development of a criteria for NOGA-FW-STD-02a to include proactive stewardship for culturally significant species or values, to include key understory species. We encourage the Forest Service to explicitly include a definition for *passive management* within the *proactive stewardship* criteria to promote appropriate old-growth forests to be stewarded without intervention. The DEIS does not reflect that some old growth forests are best cared for through restraint of vegetation management.

We believe that “de minimis use for local community purposes” in NOGA-FW-STD-02c-x allows for too much unclear discretion on rationale meeting this criteria, and the “de minimis use for local community purposes” provision should be stricken.

Infrequent-fire old-growth forests [generally retain](#) intact ecosystem functions, processes, and structures. The DEIS does not document evidence that the potential future effects of climate change justify intervention in infrequent-fire old-growth stands to protect their integrity. As such

We support a modified version of the recommendation submitted by the Climate Forest Coalition for Alternative 3 to be revised to read:

Vegetation management shall not result in

1. Cutting of old-growth trees in any forest type or cutting of trees in infrequent-fire old-growth forests, except

a. to abate a demonstrated, imminent risk to public safety;

b. For proactive stewardship of culturally significant species or values, to include key understory species for Native American or Alaska Native traditional and customary uses; or

c. as required to effectuate a statute or treaty.

2. Commercial timber harvest of old-growth trees in any forest type or any trees in infrequent-fire old-growth forests.

In general we support the intention of the Adaptive Strategy for Old-Growth Forest Conservation to include implementation and adoption of the amendment with Tribes, Alaska Native Corporations, states, local governments, and other stakeholders. We encourage the adoption of *passive stewardship* within objectives related to completing the Adaptive Strategy for Old Growth Conservation. We commend the DEIS for setting NOGA-FW-OBJ-03 to initiate at least one co-stewardship project for the purpose of proactive stewardship and we could encourage the Forest Service to increase the floor of this objective to more than one project if Tribes demonstrate through this comment period that more than one co-stewardship project is desired.

We urge the Forest Service to restore Standard 1 and include guidelines and requirements for designating mature stands that shall persist to become old-growth. It should also clarify that management activities within old-growth forests must not cause the forest to lose old-growth status. The final amendment should also ensure a diverse representation of all designated mature forest types throughout the numerous management areas, and identify numerous mature areas designated for old-growth persistence in order to account for future disturbance. As a cultural community that values intergenerational connection, especially in a family setting, we must urge the Forest Service to prioritize the inclusion of stewardship provisions for mature-growth forests to persist in future generations.

Overall we commend the Forest Service's long-haul initiative to carry out the vision of Executive Order 14072 and provide the care and respect for our deserving old-growth forests, their surrounding communities, and all who depend on them for vital ecosystem services and public health. Thank you for your diligence in gathering and analyzing thousands of public comments in the development of this historic Amendment.

GreenLatinos