

July 9, 2024

The Honorable Randy Moore
Chief, USDA Forest Service
Jamie L. Whitten Building
1400 Independence Avenue, SW
Washington DC, 20250

CC: Chris French, Antoine Dixon, Ken Arney, Jamie Barbour, Jennifer McRae, Linda Walker, Meryl Harrell, Sean Babington, Stephenne Harding, Sitka Pence

RE: NOGA fails to protect and expand mature and old-growth forests in the Eastern US

Dear Chief Moore:

Thank you for your attention to managing America's National Forest System in this era of crisis for our climate, watersheds, and wildlife.

The undersigned organizations, based in USFS Regions 8 and 9, write to you with serious concerns about the Forest Service's failure to fully and fairly assess the unique conditions, threats, and opportunities in Eastern US National Forests in the ongoing mature and old-growth analysis and policy-making process. Most recently this is reflected in the National Old-Growth Amendment (NOGA) Draft Environmental Impact Statement (DEIS), released on June 21, 2024. The NOGA DEIS fails to meet EO 14072's intent to protect and restore old-growth forests in Regions 8 and 9, and even facilitates logging within what few old-growth stands remain. Unless there is a major course correction, the result of the NOGA under any alternative contemplated in the DEIS will result in little change or weaker protections for mature and old-growth forests in the Eastern US.

Executive Order 14072 seeks to increase the amount of old-growth across federal forestlands, reading: "Sec 2. Restoring and Conserving the Nation's Forests, Including Mature and Old-Growth Forests. My Administration will manage forests on Federal lands, which include many mature and old-growth forests, to promote their continued health and resilience; retain and enhance carbon storage; conserve biodiversity; mitigate the risk of wildfires; enhance climate resilience; enable subsistence and cultural uses; provide outdoor recreational opportunities; and promote sustainable local economic development."

While the NOGA makes some limited recognition of the climate crisis it fails to recognize that the shift in climate is predicted to be very different in the East as compared to the West. For example, while some western areas are expected to experience more frequent and severe drought, much of the East is already receiving more and heavier precipitation.^{1,2} Therefore, in the East there needs to be heightened focus on flood risk and the benefits that old-growth forests can provide in terms of reducing runoff.

Mature and old-growth forests are key to confronting the climate crisis. The mature and future old-growth forests of the East already play and must continue to play a leading role in addressing that crisis. The USDA USFS Climate Adaptation Plan highlights that "[o]ld-growth and mature forests, and other forests with similar characteristics, are an ecologically and culturally important part of the National Forest System. They reside within a continuum of forest age classes and vegetation types that provides for a wide diversity of ecosystem values. Many forests with old-growth

characteristics have a combination of higher carbon density and biodiversity that contributes to both carbon storage and climate resilience”³ Region 8 and 9 currently contain more than half of the above ground biomass of the U.S.⁴ and national forests in the East store on average more carbon per hectare than do western forests.⁵ The critical role of eastern forests must not be overlooked.

The Eastern US is now left with fewer acres of old-growth forest than any other region of the US. Across all land ownerships, old-growth amounts to just 1.6% of South-Central US forests, 1.1% of Upper Midwest forests, .5% of Southeast US forests, and .4% of forests in the Northeast.⁶ The NOGA DEIS acknowledges that, for example, out of six million acres of Northern Hardwood forests in the Eastern Region (an area equivalent in size to the state of Vermont), only 1% is in an old-growth condition.⁷ Therefore, our Eastern National Forests can provide the greatest contributions to climate security and ecosystem integrity if we protect our many mature trees and forests from logging, and recruit future old-growth forests.

Among other deficiencies unique to the Eastern US, the NOGA process so far:

- **Defers** to outdated definitions in numerous Forest Plans that equate old-growth to areas of primary forest, unlogged since European settlement, thereby ensuring that minimal amounts of old-growth will continue to be recognized in eastern National Forests and precluding opportunities for old-growth restoration;
- **Fails** to address the widespread reliance upon (and in many cases, requirement for) even-aged management in Forest Plans across R8 and R9, preventing mature forests from transitioning to old-growth;
- **Overemphasizes** the threat of fire in eastern forests, refuted by the Forest Service’s own data;
- **Ignores** the unique carbon-sequestration and storage capabilities of eastern US forests;
- **Neglects** the outsized importance of federal forestland in the eastern US for recovering old-growth ecosystems at functional patch sizes for the benefit of biodiversity, clean water, flood risk reduction, carbon storage, and indigenous cultural survival;
- **Omits** opportunities to solicit public questions and input from the eastern half of the US by failing to schedule a single field meeting east of Illinois or Louisiana; and
- **Fails** to provide clear guidance on recruitment of mature forest into old-growth conditions. This is particularly concerning for the East with its shortage of existing old-growth.

Managing our National Forests to protect and enhance the benefits of mature and old-growth forests and to address the biodiversity and climate crises demands bold leadership, innovation, and a change from business as usual. Chief Moore, this is the kind of leadership we are looking for from you. But right now, in the two USFS regions with the least amount of old-growth, the US Forest Service has proposed a NOGA that maintains the status quo and fails to recognize the differences and needs of eastern forests. Without an immediate course correction, the Forest Service is at risk of completing an EIS process that does not fully address the unique climate, biodiversity, flood attenuation, and cultural values of eastern old-growth forests.

We ask that you and your staff meet as soon as possible with parties interested in recovering and expanding old-growth ecosystems in Eastern National Forests, and incorporate science and policy recommendations that reflect the threats and opportunities highlighted in this letter.

Sincerely,

Zack Porter	Executive Director	Standing Trees	Montpelier, VT
Will Harlan	Southeast Director and Senior Scientist	Center for Biological Diversity	Asheville, NC
Sonia Demiray	Executive Director	Climate Communications Coalition	Greater Washington DC area
John Coleman	Director	Speak For The Trees Too	Parsons, WV
David Nickell	Council Chair	Heartwood	Regional
Laura Haight	U.S. Policy Director	Partnership for Policy Integrity	Amherst, MA
Judith Rodd	Director	Friends of Blackwater, Inc.	Thomas, WV
Rev Michael Bean	Pastor	Presbyterian Church USA	Hustonville, KY
Samuel LaBudde	Biologist	Shawnee Park and Climate Alliance	Evansville, IN
Nathan Johnson	Senior Attorney	Ohio Environmental Council	Columbus, OH
Nicole Hayler	Director	Chattooga Conservancy	Mountain Rest, SC
Louanne Fatora	Coordinator	Greenbrier River Watershed Assoc.	Lewisburg, WV
Andy Mahler	Director	Protect Our Woods	Paoli, IN
Marilyn Shoenfeld	President	West Virginia Highlands Conservancy	Charleston, WV
Diana E. Conway	President	Safe Healthy Playing Fields Inc	Potomac MD
Ken Dolsky	VP	New Jersey Forest Watch	Sparta, NJ
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Emily Mason		Environment North Carolina	Raleigh, NC
Jennette Gayer		Environment Georgia	Atlanta, GA
Stephanie Wein		PennEnvironment	Philadelphia, PA
Avery Lamb	Co-Executive Director	Creation Justice Ministries	Washington, DC
Sarah Adloo	Executive Director	Old-Growth Forest Network	Atlanta, GA
Jennifer Mamola	Policy and Advocacy Director	John Muir Project	Washington, DC
Andrew Hinz		Beyond Extreme Energy	Washington, DC
Kevin Campbell	President	Mountain Lakes Preservation Alliance	Buckhannon, WV
Terrell Holder	Chair	Sierra Club Kentucky Chapter	Louisville, KY
James Kotcon	Chair	WV Chapter of Sierra Club	Morgantown, WV
J. William Stubblefield, PhD	Senior Scientist	Wendell State Forest Alliance	Wendell, MA
Andy Olsen	Senior Policy Advocate	Environmental Law and Policy Center	Madison, WI

Citations:

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6. Davis, M.B. (ed.). "Eastern old-growth forests. Prospects for rediscovery and recovery." (1996) Island Press: Washington, D.C.
7. National Old-Growth Amendment Draft Environmental Impact Statement (June 2024) at 64.