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Comments: To whom it may concern

Thank you for initiating a process to secure greater protection for mature and old-growth (MOG) forests. Public attitudes reflected in the attached polling data clearly reflect that the American people want their publicly owned forests protected, for the many public benefits these public forests provide. Protecting public forests from logging - including so-called "restoration,"

will not only help to mitigate the impacts of a dramatically changing climate

with its cascade of unprecedented weather extremes and catastrophic losses

but it will also help to address the global biodiversity crisis by providing

critical habitat for rare and endangered native plant and animal species

while also providing critical ecosystem services and important public benefits such as

clean water and air

healthy soils

scenic beauty

outdoor recreation opportunities for public health and well-being

protection of cultural and historic sites

scientific research, public education and increased understanding

It will also provide substantial economic benefit to adjacent communities from such things as crop pollination, tourism and enhanced quality of life, all at little or no cost to taxpayers.

We strongly urge immediate action, most notably an executive order from President Biden, which could be signed and issued now. Such an Executive Order holds the highest potential to establish enduring protections for MOG forests for generations to come. Our request, along with those in the scientific community, includes issuing a moratorium on logging within MOG to ensure these forests are protected as the amendment process proceeds to full protections for MOG.

The severe loss of biodiversity and the worsening impacts of climate change require solutions that match the magnitude of the threats we face. We need transformational change, not the status quo or incremental steps towards future outcomes. Done properly, this Nationwide Forest Plan amendment could have a meaningful, near-term impact on confronting the climate crisis and on addressing the loss of biodiversity, and we look forward to working with the agency to see this potential realized.

The EIS must analyze alternatives with significantly strengthened protections of old growth. As written, the amendment would still allow for numerous unacceptable exceptions for commercial logging of old-growth. The Forest Service should, with very limited exceptions, end felling of old-growth trees everywhere and cutting in old-growth stands where fire is infrequent. And, in all events, the amendment language must be strengthened to completely eliminate the commercial incentives to cut old-growth trees.

We also urge consideration of provisions to preclude reliance on arbitrarily restrictive definitions that artificially limit the amount of old-growth forests ultimately protected by the proposed action.

In particular we are dismayed that the Forest Service in its management prescriptions for the Hoosier National Forest limits the number of age classes for which it manages to combine all trees older than 140 years of age into a single age class, thereby preferencing younger age classes when assessing age class diversity. An honest and more accurate range of age class diversity should be extended well into the hundreds of years to more accurately reflect the ability of the forest to regenerate and restore itself, including many areas of extensive old growth. The Forest Service should ensure the amendment requires definitions that are fully inclusive of all old growth conditions, simple, and easily operationalized in the field.

And, consistent with the recognition in the notice of the importance of expanding the distribution and abundance of old growth forests, we encourage you to consider in the EIS process alternatives for conserving mature forests and trees, including their value as future old growth. National forests in certain geographic areas, for example national forests east of the 100th meridian, have little original old growth left due to logging which makes protecting mature forests all the more important. While there are certainly other threats to our older forests to be addressed (such as wildfire), the agency-acknowledged threat of ecologically inappropriate logging remains wholly and directly under USFS's control.

The national forest plan amendment must also incorporate strong monitoring and accountability measures to track the abundance and distribution of mature and old-growth forests; ensure their value as a natural carbon sink is optimized over time; and reduce the nature gap by ensuring that frontline communities and nature-deprived communities directly benefit from the proposed amendments, including through the development of an "equity layer" to the United States Forest Service Climate Risk Viewer that demonstrates these benefits across the landscape and across diverse communities.

Given the outstanding role mature and old-growth trees and forests play in fighting the climate and biodiversity crises, it is vital that America establish the strongest possible safeguards for their conservation.

We urge you to implement the following critical measures:

Acknowledgment of the Singular Threat to Forests: Logging

Identify logging as a primary threat to forest carbon storage and biodiversity and address it as the foremost concern. This is the only threat that the Forest Service can effectively cease.

Closure of Logging Loopholes for MOG Forests

The Administration's current proposal includes a glaring loophole for logging under the guises of forest health or fire management, currently used to conduct logging that is degrading the integrity of MOG forests. We request you eliminate this loophole. While felling of some roadside hazard trees may be permissible for human safety, prioritize preserving felled trees as crucial habitat and stored carbon.

Inclusion of Mature Forests

Include full protection of mature forests from logging, not just old-growth forests, and recognize mature forests as vital components of future old-growth ecosystems. For the Administration's proposal to be truly meaningful, mature forests must not be excluded from protections. The Administration's current proposal leaves out mature forests, which is tantamount to excluding the entire eastern half of the nation, since very little old-growth forest remains in the eastern U.S., due to logging.

Enduring Protection Regardless of Natural Processes

Commit to the enduring protection of designated areas, irrespective of future natural processes like insect outbreak, wildfire, or wind storms. A deep body of science finds that MOG forests most often act as climate and wildfire refugia. When these forests experience natural disturbance processes, including patches of high-intensity fire, the resulting habitat is highly biodiverse and carbon-rich. MOG forests experiencing fire or other natural processes in recent years must be protected from logging, and current MOG forests must be protected permanently, including when future natural processes, like fire, occur.

Full Protection for Tongass Old-growth

Remove the Tongass old-growth logging exemption from any further analysis in the upcoming EIS. Any financial incentive to log old trees on the Tongass conflicts with the conservation directive in EO 14072 and the global biodiversity and carbon importance of the Tongass.

Scientists have extensively documented the climate and biodiversity significance of mature and old-growth (MOG) forests in the continental United States and on the Tongass, offering valuable insights for protections based on the best available science. Moreover, it is important to emphasize that even in the case of large wildfires, they only consume less than 2% of tree carbon. In contrast, thinning operations release a considerably higher amount of carbon into the atmosphere over an equivalent area compared to wildfires.

The evidence is clear: we must cease logging in MOG forests, both before and after natural processes, and refrain from blaming natural processes as a threat to these resilient forests.

We implore this Administration to exercise executive authority promptly, rather than postponing crucial decisions until after the election. The time to act, to protect MOG forests for climate change mitigation and biodiversity conservation, is now. The power is in your hands; we urge meaningful and immediate action based on the wealth of evidence available to make the right decisions for our citizens and the climate.

ATTACHMENT: McCloskey poll (3) - Results of a telephone poll conducted by Cooper & Secrest Assc, Inc for Congressman Frank McCloskey (D-IN) whose district includes half the Hoosier NF. Year poll conducted unclear.

ATTACHMENT: polls_logging (7) - Polls about whether the Public Accepts Logging on National Forests AND Economic Information Most USFS Line-Officers Ignore and Withhold from the Local Public they Claim to Serve; Instead, they Emphasize the Need to Supply Logs to Timber Dependent Communities.