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Organization: Partnership for Policy Integrity  
Title: U.S. Policy Director  
Comments: February 2, 2024

Randy Moore, Chief

U.S. Forest Service

1400 Independence Ave., SW

Washington, D.C.

Re: Land Management Plan Direction for Old-Growth Forest Conditions Across  
the National Forest System, #65356

Dear Chief Moore,

The Partnership for Policy Integrity (PFPI) submits the following comments in response to the Forest Service's Notice of Intent to prepare an Environmental Impact Statement on the proposed Land Management Plan Direction for Old-Growth Forest Conditions Across the National Forest System (Federal Register / Vol. 88, No. 243 / Wednesday, December 20, 2023).

While PFPI applauded President Biden's Executive Order (EO) 14072, Strengthening the Nation's Forests, Communities, and Local Economies, issued on April 22, 2022, we are concerned that the proposed action falls too short of its goals. We recommend the Forest Service take further steps to protect mature and old growth (MOG) forests within the National Forest System, including those outlined below, and consider these

alternatives within the scope of the EIS.

#### Timely Action is Needed to Protect Mature and Old Growth Forests

Assuming the Forest Service completes the NEPA review according to the published schedule, the final environmental impact statement is expected in January 2025. After that, all 128 land management plans for units of the National Forest System would be amended to include an "Adaptive Strategy for Old-Growth Conservation" within two years.

While the Forest Service's proposed action takes its course, commercial logging and other human activities are degrading mature and old-growth forests at a rapid pace and must be abated. Given the political reality that implementation of this action cannot be assured should there be a change in Administration, and the scientific reality that we are running out of time to protect our forests and mitigate climate change, PFPI urges the Forest Service to take concrete measures immediately to protect mature and old-growth forests. This includes (1) strengthening the proposed action and (2) taking additional measures within the Forest Service's purview.

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#### The Forest Service Must Strengthen the Proposed Action

1) The action does not protect mature forests. Section 2(c)(iii) of EO 14072 directs USDA and DOI to "develop policies, with robust opportunity for public comment, to institutionalize climate-smart management and conservation

strategies that address threats to mature and old-growth forests on Federal lands." (emphasis added) The proposed action does not meet this requirement because it fails to protect mature forests, which are essential to meet the President's climate and 30x30 goals.

2) The action contains loopholes for logging in old-growth forests. Logging in old-growth forests must not be allowed, regardless of whether the primary purpose is for "economic reasons" or under the guise of forest health, resiliency, or fire management.

3) The action does not provide certainty that forests will be protected. The Forest Service should promulgate an enforceable rule that strictly prohibits logging in mature and old-growth forests nationwide and prioritizes protecting intact forests, with no exceptions (such as for the Tongass National Forest). Protecting mature and old-growth forests for their climate benefits would continue to allow these areas to be managed for watersheds, wildlife, fish, and outdoor recreation, consistent with the Multiple Use Sustained Yield Act.

#### The Forest Service Must Consider Additional Actions to Protect Mature and Old-Growth Forests in the NEPA Review

In the alternatives analysis required under NEPA, the Forest Service should evaluate alternative actions that provide maximum protection for mature and old-growth forests within the National Forest system from the threat of logging, roadbuilding, clearing, and other human activities.

PFPI urges the Forest Service to take the following additional actions to protect MOG forests. These actions are discussed in more detail in PFPI's comments submitted in response to the ANPR last summer (attached). Some of these actions could be taken immediately, without environmental review.

1) Suspend all recently approved logging projects, or projects under consideration, that would cut trees in mature and old-growth forests until the land management plans have been amended. For sustained protection, however, protecting mature and old-growth forests requires adopting an enforceable regulation that prohibits logging them.

2) Stop allowing logging in inventoried roadless areas, and amend the 2001 Roadless Area Conservation Rule (RACR) to eliminate exceptions

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3) Designate areas of forest in the Eastern United States that were excluded from the National Roadless Inventory

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4) Stop defending in court those timber sales in the Pacific Northwest that were

approved after the Eastside Screens rule was repealed by the Trump Administration in January 2021, and initiate a rulemaking process to reinstate the Eastside Screens rule or a broader rule that provides equal or greater protection

5) Withdraw the Forest Service's proposed rule change to allow "exclusive and perpetual use" of national forest lands for CO2 injection wells for carbon capture and storage (CCS) projects (RIN 0596-AD55/FS-2023-0014-0001)

6) Stop bulldozing fire lines in federally designated wilderness areas.

Unlike climate change, insects, disease, and wildfire, these threats to forest health and ecosystem integrity are wholly within the ability of the Forest Service to control and regulate. Such an analysis should rely on up-to-date scientific information, and consider the acreage of forests that would be protected under these scenarios, along with climate benefits, biodiversity, and alignment with the President's 30x30 initiative and international climate and forest commitments.

Thank you for this opportunity to comment.

Sincerely,

Laura Haight

U.S. Policy Director

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Attachment

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[https://www.capitalpress.com/ag\\_sectors/timber/judge-sides-with-environmental-groups-in-eastside-screens-case/article\\_b5bf683e-483d-11ee-afb1-5fcafc80fd3f.html](https://www.capitalpress.com/ag_sectors/timber/judge-sides-with-environmental-groups-in-eastside-screens-case/article_b5bf683e-483d-11ee-afb1-5fcafc80fd3f.html)

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ATTACHMENT: PFPI MOG NOI comments 2-1-24.pdf is letter content.

ATTACHMENT: PFPI MOG ANPR comments 7-20-23.pdf is comments submitted previously on the ANPR.