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Comments: RCC Comment: USFS Old-Growth Amendment DEIS

Since the issuance of President Biden's Executive Order 14072 and the US Forest Service (USFS)'s nationwide amendment to 128 forest plans, the Rachel Carson Council (RCC) has been eager to see the USFS and BLM implement comprehensive, meaningful safeguards for the conservation of old-growth forests.

Unfortunately, while it has the potential to make sweeping positive changes, the current National Old-Growth Amendment (NOGA) DEIS falls short in establishing those protections, by omitting a few crucial details.

First, none of the listed alternatives contain explicit provisions that prohibit the cutting and selling of old-growth on public lands. The hundreds of thousands of already-submitted comments from the public on this issue are a testament to how the American people feel: the management of old-growth forests does not, and should not, require commercial exchanging of the trees. This proposal should not aspirationally end logging but should boldly and explicitly prohibit it.

The United States has lost most of its old growth to over 100 years of logging. Today, up to 45% of USFS-managed old growth remains unprotected from logging. For that reason, it is alarming to see that Alternatives 2, 3, and 4 discuss "Adaptive Strategies" that reference mature forests but do not introduce any standards for protecting mature forests, despite widespread public calls to do so (local discretion is not enough for designating old-growth trees). Mature forests and trees-tomorrow's old growth-need specific written protections. It is not only a forward-thinking but a common-sense strategy to do so.

Every Alternative also presumes that old-growth forests need to be "actively stewarded" (logged) in order to persist, which is untrue. It is a dangerous assumption to declare "proactive stewardship" (Alternative 2) a necessity or even a preference when it leaves such wide discretion for old-growth logging.

In short, we urge the USFS to adopt a modified Alternative 3 with the following revisions in the final record of decision:

- End the cutting of 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 old-growth trees. Even in the rare circumstances where an old-growth tree is cut (e.g. public safety), that tree should not be sent to the mill. (Uphold "no commercial exchange" provision, Alternative 3.)
- Remove the exception that allows for "de minimis" logging of old-growth trees. The USFS will find that "local community purposes" and "research" are easily exploitable. What was previously worrisome to Americans about the earlier Tongass exemption can now be universally applied in the forest system due to the harmful "de minimis" provision.
- Eliminate the agency discretion to manage old growth out of existence in pursuit of "proactive stewardship" goals.

Researchers estimate that 98% of the world's primary forests are located in just 25 countries-it is a rare and magnificent fortune that the United States enjoys this natural feature. The USFS should acknowledge this with humility and with straightforward policy protections for old growth, especially as a free carbon-sink solution amid a hard-to-tackle climate crisis. No amount of high-tech, expensive carbon capture machinery can efficiently replicate the age-old ecosystem services that old-growth and mature forests provide: they mitigate over 10% of our country's annual greenhouse gas emissions. It would be prudent for a final proposal to weigh in this reality.

In the critical final years to address climate change, per IPCC warnings, now is not the time to be discretionary and use weak, malleable language for old growth logging: especially for actions that would take forests out of old-growth status altogether and counterintuitively remove their NOGA protection.

For these reasons, we urge the USFS to adopt a modified Alternative 3, outlined above, in its final proposal to protect old growth and mature forests. We are eager to see the USFS honor the NOGA's purpose and need of ecological integrity and obey its agency mandate to develop a meaningful and durable forest protection policy.

ATTACHMENT: RCC Comment on USFS Old-Growth Amendment DEIS .pdf - this is the same content that is coded in text box; it was also included as an attachment