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Comments: Attached are comments on behalf of the Eastside Forest Coalition, which includes Central Oregon LandWatch, Oregon Wild, Blue Mountains Biodiversity Project, Great Old Broads for Wilderness Central Oregon Bitterbrush Broadband, Sierra Club Juniper Group, WildEarth Guardians, and Greater Hells Canyon Council.

September 19, 2024

Submitted electronically via the Comment Analysis and Response Application portal

Randy Moore, United States Forest Service Chief

United States Department of Agriculture

1400 Independence Ave. SW

Washington, DC 20250

RE: Eastside Forest Coalition Comments on Amendments to Land Management Plans to Address Old-Growth Forests Across the National Forest System, Draft Environmental Impact Statement

Dear Chief Moore,

Please accept these comments on the draft environmental impact statement (DEIS) for the proposed Amendments to Land Management Plans to Address Old-Growth Forests Across the National Forest System ([ldquo]National Old-Growth Amendment[rdquo]) on behalf of the Eastside Forest Coalition, a collective of nonprofit organizations dedicated to defending forest ecosystems across the Eastern Cascades and Blue Mountains of Oregon and southeast Washington ([ldquo]eastside forests[rdquo]). Our organizations[rsquo] staff, volunteers, and members have spent thousands of hours in forests across the region and know them well.

We encourage the Forest Service to strengthen the final language of the National Old-Growth Amendment to establish durable, consistent, and robust protections for old-growth and mature forests and trees, both east of the Cascades and in National Forests across the United States. Mature and old-growth forests in the Eastern Cascades and Blue Mountains are crucially important in the fights against climate change and biodiversity loss, and our region requires a bold and immediate paradigm shift if forest ecosystems are to survive and adapt to a rapidly changing climate. While the National Old-Growth Amendment process presents a promising opportunity to safeguard our mature and old-growth forests and habitats, the preferred alternative presented in the DEIS (Alternative 2) falls short of offering meaningful protections for the rare and critical habitat and ecosystem services that large trees provide.

The DEIS states that [ldquo]all action alternatives will support ecosystem integrity and ecosystem services associated with old-growth forests such as biodiversity, carbon storage and stability, and water quality[rdquo] (DEIS at S-10). While we agree that this would be the ideal outcome of the National Old-Growth Amendment, we respectfully disagree that the Alternatives analyzed in the DEIS will achieve this goal at the speed and scale required to address both the biodiversity crisis and climate impacts unfolding across the world[rsquo]s forested landscapes. Leaving open the possibility of removing old-growth trees cannot reasonably be construed as a

pathway to [ldquo]provide for ecological integrity of old-growth forest ecosystem services[rdquo] (DEIS at S-13).

To that end, the Eastside Forest Coalition strongly recommends that the Forest Service adopt a modified Alternative 3 that incorporates the following changes and considerations:

? Include protections for mature trees and forests in addition to prohibiting the removal of old-growth trees and forests.

? Prohibit any commercial exchange of mature and old-growth trees. ? Provide durable protections for mature and old-growth trees and forests that are not subject to forest-level or regional management discretion. Remove loopholes that allow for narrow local definitions of old-growth and [ldquo]proactive stewardship activities[rdquo] that could effectively manage old-growth out of existence.

? Incorporate more rigorous accounting for the climate and biodiversity benefits of protecting mature and old-growth forest systems.

? Recognize that managing forests to return to an ecologically functional wildfire regime should not allow for cutting the largest, oldest, and often most fire-resilient trees, particularly in intact old-growth stands.

We request that the agency take a decisive approach to the National Old-Growth Amendment that protects mature and old-growth trees of all species in forests east of the Cascade Crest and throughout the United States.

We write from the context of decades-long efforts to protect mature and old-growth forests on the eastside of Oregon and Washington. Prior to the implementation of the Eastside Screens in 1994, our region experienced aggressive logging on public lands that left few remaining large, mature or old-growth trees[mdash]classified on the eastside as those trees greater than or equal to 21[rdquo] diameter at breast height (DBH)[mdash]on the six National Forests covered by the rule in our region. Even still, these large tree protections have proven vulnerable to logging, as demonstrated by the Trump Administration[rsquo]s attempt to override the 21[rdquo] rule in its waning days. On January 12, 2021, just a few days before President Biden[rsquo]s inauguration, James Hubbard, a Trump-appointee to the USDA, removed a legal standard under the Screens that prohibited the logging of large trees over 21[rdquo] in diameter. This was a last-minute rollback of environmental safeguards that removed protections for big trees and old-growth on over 9 million acres of public lands. The Eastside Forest Coalition, with support from the Nez Perce Tribe, successfully fought to reinstate the Eastside Screens in 2024, but without stronger nation-wide standards there is still real potential for future challenges to weaken or eliminate the 21[rdquo] rule.

We must do more to safeguard eastside forests. The diverse forests of the Eastern Cascades and Blue Mountains are important as part of regional, continental, and global systems. They hold unique and irreplaceable ecological and cultural value, and provide core habitat and connectivity corridors for wildlife that live and move between the Rockies and Cascades, and across the Great Basin and Columbia Plateau. The region hosts a great variety of fish, wildlife, plants and other life in a landscape composed of dynamic habitats and large elevational gradients. This diversity provides opportunities for species to survive in[mdash]and adapt to[mdash]a changing climate.[1, 2]

The region supports some of the longest free-flowing rivers in the Western United States. Intact watersheds offer cold, clean water and important habitat for salmon and other aquatic and terrestrial life. Mature and old-growth trees and forests are critical to wildlife habitat connectivity, watershed health, and overall ecosystem function, and the Forest Service has an obligation to protect these values through the National Old-Growth Amendment.

We ask the Forest Service to implement a management paradigm that seeks to:

? Protect mature and old-growth forests and trees from logging and commercial use.

? More broadly, support mature and old-growth forest health, including their dynamic natural processes, and protect the few remaining large and old trees.

? Protect ecosystems and ecosystem function to support biodiversity, wildlife habitat, connectivity, carbon storage, natural disturbance regimes and succession, and climate change mitigation and adaptability.

? Safeguard water quality and habitat for aquatic and riparian species dependent on clean, cold water in streams, rivers, tributaries, and wetlands.

? Create and work with an organized community of people and entities that seek to understand, appreciate, and advocate for the ecological integrity of eastside forests.

? Be informed by and promote sound science.

? Think long term, remain humble, and be guided by intrinsic, spiritual, and cultural values.

? View [ldquo]natural resources[rdquo] as natural relationships, and help communities transition from extractive economies to those that foster better relationships with natural values.

? Recognize and protect the sovereignty, rights, and interests of Indigenous people and ensure their voices are meaningfully heard and addressed.

? Ensure public lands and values are managed through fair, democratic, and inclusive processes recognizing that[mdash]to the extent they belong to anyone[mdash]they belong to everyone, equally.

Include Protections for Mature Trees and Forests

Section 2(c)(iii) of President Biden[rsquo]s Executive Order 14072, which launched the National Old-Growth Amendment process in 2022, explicitly directed the USFS to [ldquo]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.[rdquo][3]

This DEIS ignores both the spirit and letter of this direction by not including any mature forest protections or any serious strategies for recruiting future old-growth forests.

None of the proposed alternatives include protections for mature trees and forests, despite strong public calls for such safeguards during the scoping period. Part of the [ldquo]purpose and need[rdquo] of this EIS is ecological integrity. Without specific mature forest protections, the agency will fail to recover the abundance and distribution of old-growth forests and will undermine its own ecological integrity objectives.

No Commercial Logging of Old-Growth and Mature Trees and Forests

The National Old-Growth Amendment should prohibit commercial logging of old-growth and mature trees and forests, meaning mature and old-growth trees would not be taken off the forest, sold in whole or part, exchanged for value, or disposed of to facilitate a commercial use. This would not preclude truly [ldquo]proactive stewardship[rdquo] activities, such as prescribed burning, or other management options that prioritize ecological function. Rather, it would decouple profit motives from mature and old-growth forest stewardship on our public lands.

As it stands, Alternative 3 is the only proposed alternative that would not allow commercial timber harvest of old-growth as a form of [ldquo]proactive stewardship[rdquo] in Standard 3, which would be modified to read [ldquo]Proactive stewardship in old-growth forests shall not result in commercial timber harvest[rdquo] (DEIS at 53). The DEIS claims that this [ldquo]could impact the ability to achieve ecologically driven desired conditions,[rdquo] which again relies on the backward principle of cutting old-growth to save old-growth, even though Alternative 3 would still allow for non-commercial thinning as a management tool (DEIS at 16). Further, the DEIS acknowledges that, [ldquo]As of 2019, only 3 percent of national timber consumption originated from Forest Service lands[rdquo] and [ldquo]areas of old-growth where tree cutting occurred was only 4.7 percent of the total tree cutting across all Forest Service lands from 2000 to 2020[rdquo] (DEIS at S-14). Not only does this mean, by the Forest Service[rsquo]s own determination, that the National Old-Growth Amendment will not substantively affect the timber industry, but it also means that there is no reason to include any commercial logging of mature and old-growth trees in the final EIS at all.

Implement Durable Protections Based on Rigorous Standards

As currently written, the proposed alternatives in the DEIS all appear to allow the agency to manage old-growth forests to the point of no longer classifying as old-growth, after which protections by the National Old-Growth Amendment become irrelevant. Local agency staff retain the discretion to use [ldquo]proactive stewardship[rdquo] activities that may involve either directly logging old-growth or otherwise managing them out of existence, and they may still modify or remove protections for old-growth through forest plan amendments or revision processes. The deference to local discretion and management approaches negates the power of a strong nation-wide backstop on old-growth logging and precludes a clear national vision of what [ldquo]improving the retention and recruitment of old-growth forests[rdquo] means in practice (DEIS at S-6). In its quest for flexibility at all junctures, the Forest Service retains loopholes that make durability and consistency functionally impossible.

The final EIS must fulfill its stated intention to [ldquo]add language that provides consistency across LMPs,[rdquo] while still allowing for LMPs to provide [ldquo]more restrictive constraints on actions in existing or potential old-growth forests[rdquo] (DEIS at 8). Achieving consistency and durability means any local management discretion around old-growth forests must trend toward stronger, not weaker, protections. We ask the Forest Service to adopt an anti-degradation standard in the final DEIS, further strengthening the language in Alternative 3 so that forest-level management activities cannot degrade old-growth characteristics and to disincentivize [ldquo]managing to the minimum.[rdquo]

Meaningfully Address the Climate and Biodiversity

Crises In contrast to the failed strategies of widespread and heavy logging in the backcountry, the Eastside Forest Coalition envisions a strategy of proforestation, meaningful protection, and restoration that addresses the primary drivers of ecological degradation. A strategy that prioritizes the protection of biodiversity, wildlife habitat, clean cold water, and soils can store greenhouse gasses and help address the climate crisis. Large trees in this region play an especially outsized role in sequestering carbon.[4] True restoration activities, including strong protection for large trees, can make a significant impact in fighting climate change and biodiversity loss.

Moreover, large trees are already rare on the eastside. Representing only 3 percent of trees in eastside forests, they store a disproportionately large amount[mdash]42 percent[mdash]of aboveground carbon.5 In the decades since the implementation of the Eastside Screens, the ecological value of these large trees has only grown along with our understanding of the forest ecosystems that rely upon them. Now is not the time to rollback large tree protections as was done with the 2021 Region 6 Forest Management Direction for Large Diameter Trees. Rather, now is the time to enact truly climate-smart forestry with robust protections for large trees and the complex and interconnected ecosystems they support, both nation-wide and in eastside forests.

The release of carbon-based greenhouse gasses is a key driver of the climate crisis. As such, it is time for the Forest Service to acknowledge, protect, and enhance the important role mature and old-growth forests in particular play in storing and sequestering both atmospheric carbon dioxide and methane[6] . Managing our forests to recruit new mature and old-growth trees will allow for the continued sequestering of carbon, but protecting the accumulated carbon stores in existing mature and old-growth forests from being released is equally, if not more, important.[7] Large trees must be protected from logging to keep an already dire global issue from getting even worse.

For both human and wild communities, mature and old-growth trees are worth more standing, particularly in eastside forests. It is imperative that the Forest Service use this opportunity to revise the standards within the National Old-Growth Amendment to reflect this reality. The final EIS should also explicitly acknowledge the vital role of mature and old-growth forests in combating climate change and biodiversity loss, rather than framing wildfire and economic profit as the only motivating forces behind management decisions.

Adopt Ecologically Sound, Scientifically Informed Practices that Rethink our Relationship to Fire

Under the paradigm proposed and perpetuated by Alternative 2, mature and old-growth trees have been and will continue to be systematically targeted for logging, typically in the name of misguided wildfire prevention and suppression strategies. In geographies like the eastside forests, however, near-future vulnerability to wildfire, while an important consideration, is generally low, making this an inappropriate strategy counter to the stated purpose of the NOGA.[8] In our region and elsewhere, mature trees are already more resistant to fire than smaller, younger trees, and their removal would not reduce the frequency or severity of wildfires in the region.[9] In fact, mature and old-growth stands with large trees creating closed canopies can reduce the risk of wildfire by creating cooler microclimates and buffering the understory from solar radiation that would otherwise dry out and increase wildfire ignition and severity. [10, 11, 12]

As currently written, however, the DEIS allows cutting mature and old-growth trees in the name of wildfire management as a type of [ldquo]proactive stewardship[rdquo] activity. This approach relies on unscientific and illogical reasoning that amounts to cutting old-growth trees to [ldquo]save[rdquo] old-growth trees from wildfire. Both in eastside forests and elsewhere across the National Forest System, this scientifically flawed management approach will fail to protect our oldest, most biodiverse forests.

Conclusion

We applaud the effort to establish nation-wide safeguards for old-growth trees and forests, but the alternatives in the DEIS will fail to protect our most important forest ecosystems. President Biden straightforwardly called for strong, durable safeguards to mature and old-growth forests in EO 14072, making clear where the values of this Administration stand when it comes to the management of our National Forests. With this National Old-Growth Amendment, the Forest Service must rise to this call and fulfill its responsibilities to the American people and our public lands.

Old-growth and mature trees are worth more standing than logged, and they should be held in trust for the public. Please take this opportunity to improve the Forest Service[rsquo]s approach to protecting critical wildlife habitat, natural climate solutions, and other ecosystem services for current and future generations.

Sincerely,

Eastside Forest Coalition

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3 Federal Register, Executive Office of the President, 27 Apr. 2022, www.federalregister.gov/documents/2022/04/27/2022-09138/strengthening-the-nations-forests-communities-and-local-economies.

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ATTACHMENT: NOGA_DEIS_EFC_Comment_Final.pdf - this is the same content that is coded in text box; it was originally only included as an attachment