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Comments: 20 September 2024

Dear President Biden, Agriculture Secretary Vilsack, U.S. Forest Service Chief Moore, and Deputy Chief French,

We the undersigned organizations write to express our deep concern with the Draft Environmental Impact Statement (DEIS) for the Forest Services' proposed Amendment to Land Management Plans to Address Old-Growth Forests Across the National Forest System. In compliance with the President's Executive Order 14072 regarding old forest conservation, the President's commitments to the Paris Climate Agreement, and the Glasgow Leaders' Pledge to end deforestation and forest degradation, we urge you to fully protect all mature and old-growth forests (MOG) on national forest lands from logging. Executive Order 14072 noted that MOG forests "play an irreplaceable role in reaching net-zero greenhouse gas emissions" and promised to "retain and enhance carbon storage" in MOG forests. The DEIS does not comply with these promises and does not provide a reasonable range of alternatives, as follows.

\* By allowing the sale and removal of MOG trees, not a single acre of these biodiverse, carbon-rich forests is protected from logging, which will further degrade them.

\* Mature forest protections were omitted, which is most of the carbon-rich forests in the Western US and nearly all mature forests recovering from logging in the Eastern US.

\* Logging levels, and carbon removal, would nearly double in MOG forests (DEIS Threats Analysis, Fig. 19), making this more of a logging plan than a forest protection plan.

\* Unacceptably downplays health impacts and cumulative effects of increased logging, especially to environmental justice communities that are disproportionately impacted.

\* Promotes logging for "energy production" (DEIS, p. 75) that will emit 5.2 x more nitrogen oxides; 30 x more volatile organic compounds; 7 x more ammonia; 3.2 x more sulfur dioxide; 12.5 x more PM2.5 particulates, and 38% to 65% more CO2 into the atmosphere than burning coal.

\* None of the alternatives faithfully implement President Biden's April 2022 Executive Order on MOG, which promised to "conserve America's mature and old-growth forests on Federal lands." Increased logging levels in the plan run contrary to that promise.

\* Hypothetical modeling studies and discredited assumptions were used to promote the false notion that removing carbon from forests through logging will increase forest carbon storage (DEIS, pp. 75-76; DEIS Ecological Impacts Analysis, p. 44). Hundreds of climate scientists and ecologists have debunked these false claims.

\* Omits research findings that thinning emits about 3 times more CO2 per acre than wildfire alone, for equal energy produced, and that thinning kills significantly more trees than it prevents from being killed.

\* Nowhere in the DEIS or its associated reports does the Forest Service include an analysis of the impact of its increased logging of mature and old-growth trees and forests on forest carbon storage and carbon flux (gross emissions especially). The Forest Service's own research shows that increased logging would substantially undermine atmospheric carbon draw down and compromise our ability to achieve net-zero emissions, while protecting forests from logging would reduce atmospheric carbon by 84 million tons of CO2 every year. Further, the Threats Analysis omits mention of field-based research that found even big fires only consume less than 2% of tree carbon, while thinning of MOG trees removes far more carbon-most of which is quickly emitted into the atmosphere and only a small portion of which ends up as lumber.

\* Assumptions about fire are not based on best available science as there is no mention of the dozens of scientific studies, including by many US Forest Service scientists who have found that denser, MOG forests tend to burn at lower severities, while thinning and other logging conducted ostensibly as hazardous fuels reduction often exacerbates wildfires by eroding the cool, shady microclimate provided by denser forests.

We firmly disagree with the agency's assumption that mature and old-growth forests must be logged to prepare them for fire, as many studies by the Forest Service's own scientists show managed wildfire or prescribed fire can be applied, during natural fire season, without any prior tree removal. Rather than spending large sums of Infrastructure Act funds and other taxpayer money on highly expensive mechanical logging operations that degrade MOG forests, we urge you to instead redirect these efforts to helping communities become fire-safe, including defensible space pruning for homes adjacent to national forests.

We thank you for initiating this process but urge you to fix the serious problems with the DEIS, and fully protect MOG forests from logging, as over 200 scientists have urged. Doing so would leave a legacy gift of your Administration to the nation and the planet.

Sincerely,

1. 350 Bay Area Action
2. 350 Chicago
3. 350 Colorado
4. 350 Eastside (Seattle)
5. 350 Eugene
6. 350 PDX
7. 350 Salem Oregon
8. 350 Seattle
9. 350 Wenatchee
10. 350 West Sound Climate Action
11. 350 Wisconsin

12. 350 Yakima Climate Action
13. Advocates for the Environment
14. Allegheny-Blue Ridge Alliance
15. Alliance for the Wild Rockies
16. Alliance of Nurses for Healthy Environments
17. American Federation of Government Employees Local 704
18. American Jewish World Service
19. Animals Are Sentient Beings, Inc.
20. Anthropocene Alliance
21. Arkansas Community Organizations
22. Athens County's Future Action Network
23. Battle Creek Alliance
24. Between the Waters
25. Biodiversity for a Livable Climate
26. Biofuelwatch
27. Bird Alliance of Oregon, Ten Mile Creek Sanctuary
28. Blue Mountains Biodiversity Project
29. Buffalo Trace Preservation Group
30. California Chaparral Institute
31. CASA
32. Cascadia Climate Action Now
33. Center for a Sustainable Coast
34. Center for Sustainable Economy
35. Chattooga Conservancy
36. Cherokee Concerned Citizens
37. Christians Caring for Creation

38. Christians For The Mountains
39. Citizens Awareness Network
40. Citizens Committee for Flood Relief
41. Clean Air For All Now
42. Climate Action Now Western Massachusetts
43. Climate Cardinals
44. Climate Communications Coalition
45. Climate Equity Policy Center
46. Cloud Forest Institute
47. Coalition for Wetlands and Forests
48. Coast Range Association
49. ColorBrightonGreen
50. Comeback Farm
51. Common Ground Rising
52. Concerned Citizens of Cook County (GA)
53. Concerned Citizens of Franklin County (MA)
54. Concerned Health Professionals of Pennsylvania
55. Conservation Congress
56. Cool OC
57. Coriolis Films LLC
58. Cowpasture River Preservation Association
59. Dan Riverkeeper
60. Defiance Canyon Raptor Rescue
61. Deignan Institute for Earth and Spirit at Iona University
62. Delaware Riverkeeper Network

63. Dogwood Alliance
64. Don't Waste Arizona
65. Earth Ethics, Inc.
66. Earth Law Center
67. Earth Ministry, Washington Interfaith Power and Light
68. ecoAmerica
69. Eco-Integrity Alliance
70. EcoJustice Collaborative
71. Eighty2degrees Design Studio
72. Elders Climate Action
73. Endangered Species Coalition
74. Environmental Education Fund
75. Environmental Paper Network
76. Extinction Rebellion San Francisco Bay Area
77. Extinction Rebellion Western Massachusetts
78. Feather River Action!
79. For a Better Bayou
80. Forests Forever
81. Forest Keeper
82. Friends For Environmental Justice LLC
83. Friends of Big Ivy
84. Friends of Inwood Hill Park
85. Friends of the Bitterroot
86. Friends of the Clearwater
87. Gallatin Wildlife Association
88. Great Lakes Wildlife Alliance

89. Greater Greener Gloster Project
90. Greece Baptist Sustainability Team, New York
91. Green Cove Defense Committee
92. GreenFaith United States
93. Gullah Geechee Chamber Foundation
94. Habitat Recovery Project
95. Heartwood
96. HUBitual Learning and Outreach
97. I Heart Pisgah
98. Idaho Rivers United
99. Intheshadowofthewolf
100. John Muir Project
101. Junta Comunitaria Pastillo Tibes Corp
102. Kettle Range Conservation Group
103. Klamath Forest Alliance
104. Lake Lemon Guest Houses
105. LandHealth Institute
106. Last Tree Laws
107. Legal Rights for the Salish Sea
108. Life Net
109. Los Padres ForestWatch
110. Magnolia Forest Group
111. Maine Unitarian Universalist State Advocacy Network
112. Malach Consulting
113. Marin City Climate Resilience

114. Micah Six Eight Mission
115. Mighty Earth
116. Mississippi Communities United for Prosperity (MCUP)
117. Model Forest Policy Program
118. Mount Shasta Bioregional Ecology Center
119. Move Past Plastic (MPP)
120. National Religious Coalition on Creation Care
121. Natural Resources Law
122. New Jersey Forest Watch
123. New Jersey Highlands Coalition
124. New Mexico Climate Justice
125. New Mexico Interfaith Power and Light
126. New York Progressive Action Network
127. North American Climate, Conservation and Environment (NACCE)
128. North Cascades Conservation Council
129. North Carolina Climate Justice Collective
130. Northcoast Environmental Center
131. Northwest Watershed Institute
132. Oil and Gas Action Network
133. Okanogan Highlands Alliance
134. Olympic Climate Action
135. Olympic Forest Coalition
136. Park County Environmental Council
137. Partnership for Policy Integrity
138. Patagonia Area Resource Alliance
139. Pennsylvania Interfaith Power & Light

140. Pilchuck Audubon Society
141. Plastic Pollution Coalition
142. Portland Harbor Community Coalition
143. Prairie Hills Audubon Society
144. Project Outreach: Frac Sand Sentinel
145. Protect Newton Trees
146. Protect Our Woods
147. Protect PT
148. Protect Thacker Pass
149. Rachel Carson Council
150. Reforest Our Future
151. Renewal of Life Land Trust
152. RESTORE: The North Woods
153. Restoring Earth Connection (Thurston Friends of Trees)
154. Rocky Mountain Wild
155. Safe Alternatives for our Forest Environment
156. Santa Fe Forest Coalition
157. Satilla Riverkeeper
158. Save Lake Superior Association
159. Save Massachusetts Forests
160. Save Our Cabinets
161. Save Our Sky Blue Waters
162. Save Our St. Vrain Valley, Inc.
163. Seeds in Common
164. Selkirk Conservation Alliance



165. Sequoia ForestKeeper
166. Skagit Audubon Society
167. Smith River Alliance
168. Sonoma County Climate Activist Network (SoCoCAN!)
169. South Bronx Unite
170. South River Watershed Alliance
171. Sowing Justice
172. Standing Trees
173. Swan View Coalition
174. Tahoe Forests Matter
175. Tennessee Heartwood
176. Terra Advocati
177. The Clinch Coalition
178. The Enviro Show
179. The Forest Advocate
180. The Last Plastic Straw
181. The Wei LLC
182. The Young People's Guild
183. Thonet Associates
184. Thurston Climate Action Team--Tree Action Group
185. Timbuctoo Mountain Club
186. Transit Oriented Development Institute
187. Trees as a Public Good Network
188. Tualatin Riverkeepers
189. Turtle Haven Sanctuary
190. Turtle Island Restoration Network

191. Umpqua Natural Leadership Science Hub
192. Unitarian Universalists for a Just Economic Community
193. Unite the Parks
194. United Plant Savers
195. Utah Physicians for a Healthy Environment
196. Wall of Women
197. Washington Wildlife First
198. Wasteful UnReasonable Use (WURU)
199. Water League
200. Waterspirit
201. We Advocate Thorough Environmental Review (WATER)
202. West Virginia Highlands Conservancy
203. Western Environmental Law Center
204. Western Watersheds Project
205. Whatcom Million Trees Project
206. Wild Cumberland
207. Wild Heritage
208. Wild Nature Institute
209. Wild Orca
210. Wild Virginia
211. Wild Watershed
212. WildEarth Guardians
213. WildLands Defense
214. World Rainforest Fund
215. Wyoming Wildlife Advocates

216. Yaak Valley Forest Council

217. Yakima Citizens Climate Lobby

218. Zero Waste JXN

ATTACHMENT: Fire Morris 1940 abstract.pdf

ATTACHMENT: Fire Morrison and Harma 2002.pdf

ATTACHMENT: Fire North et al 2015b.pdf

ATTACHMENT: Fire Platt et al 2006.pdf

ATTACHMENT: Fire prescr burning Knapp and Keeley 2006 .pdf

ATTACHMENT: Fire prescr burning Knapp et al 2005.pdf

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ATTACHMENT: Fire prescr burning van Mantgem et al 2011.pdf

ATTACHMENT: Fire prescr burning van Mantgem et al 2016.pdf

ATTACHMENT: Fire Syphard et al 2014.pdf

ATTACHMENT: Fire Thompson and Spies 2010a.pdf

ATTACHMENT: Fire Thompson et al 2007.pdf

ATTACHMENT: Scientist letter opposing logging bills Dec2016 Final.pdf

ATTACHMENT: Scientist letter opposing logging provisions in BBB and BIF 4Nov21.pdf

ATTACHMENT: Scientist Letter opposing postfire logging Oct2015.pdf

ATTACHMENT: Scientist letter to Congress June2020.pdf

ATTACHMENT: Scientist sign on letter to Congress on postfire logging 30Oct13 final.pdf

ATTACHMENT: Organizations Call on Biden Administration to Protect Mature and Old-Growth Forests from Logging.pdf

ATTACHMENT: Fire Baker 2014RFS.pdf

ATTACHMENT: Fire Hanson and North 2008 RFS.pdf

ATTACHMENT: Fire Hanson et al. 2024bRFS.pdf

ATTACHMENT: Fire Reilly et al 2022 OR 2020 fires mainly climate&weatherRFS.pdf

ATTACHMENT: Fourmile Canyon Fire FindingsRFS.pdf

ATTACHMENT: Fire Meigs et al 2020 dense old forests burn at lower severity-compressed.pdf

ATTACHMENT: Fire Odion et al 2014 PLoS ONE Table S1 (1).pdf

ATTACHMENT: Fire Odion et al 2014a (1).pdf

ATTACHMENT: Fire Odion et al 2016 (1).pdf

ATTACHMENT: Fire SNEP 1996 Executive Summary.pdf

ATTACHMENT: Fire Thompson and Spies 2009.pdf

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