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Organization: Bulk - Klamath Siskiyou Wildlands Center

Title: Executive Director

Comments: Dear Chief Moore,

Mature and old-growth trees and forests protect our climate by absorbing and storing carbon, boosting resilience to fire, regulating temperatures, filtering drinking water, and sheltering wildlife. Logging these trees deprives us and future generations of the benefits and beauty of our largest, oldest trees. The National Old-Growth Amendment Draft Environmental Impact Statement (EIS) is a great step forward in recognizing the values of mature and old-growth forests. It is also a step forward in recognizing and including Indigenous tribes and knowledge into forest management policy.

However, the Klamath Siskiyou Wildlands Center and our 967 petition signers are concerned the draft fails to adequately protect mature trees and forests. Mature trees are future old growth and must be adequately protected in order to recover old growth that has been lost to past mismanagement. Protection of mature forests can be accomplished in a manner that is consistent with addressing the threat of fire.

The Final EIS should more clearly describe the focus on restoring forest resilience in the face of climate change. It is imperative that the final plan prioritizes the enhancement of forest resilience to climate impacts, including increased fire risk. Protecting old-growth trees is a crucial component of this effort. As legacy features, they play an irreplaceable role in maintaining the health and stability of forest ecosystems. These trees are essential for mitigating climate change effects and ensuring that forests can continue to thrive despite increasing environmental stressors.

The draft also fails to adequately protect mature trees and forests. Mature forests and trees - future old growth - must be protected from the threat of commercial logging in order to recover old growth that has been lost to past mismanagement. Protection of mature forests can be accomplished in a manner that is consistent with addressing the threat of fire. They must be protected to aid in the fight against worsening climate change and biodiversity loss.

Protecting mature trees will help ensure that the next generation will be able to experience and enjoy old growth. We urge you to take this opportunity to protect our oldest trees and forests. Failure to do so undermines the direction of EO 14072. Please take this opportunity to listen to the over half a million public comments asking the agency to protect mature and old growth during last summer's notice of rulemaking.

ATTACHMENT: USFS NOGA Comment Letter - 9.20.2024.pdf - - this is the same content that is coded in text box; it was also included as an attachment

ATTACHMENT: NOGA Petition Signers - 9.20.2024.pdf - This attachment contains 967 names and contact information for signors to the comment letter