

Data Submitted (UTC 11): 1/28/2024 12:31:16 AM

First name: Stephen

Last name: Fuller-Rowell

Organization:

Title:

Comments: To: The Honorable Randy Moore, U.S. Forest Service Chief

Re: USDA Old-Growth Initiative #65356

Date: February 2nd, 2024

---

Dear Chief Moore,

Thank you for starting a process that we hope will end with meaningful protections for existing old-growth forests and trees across the United States, and increase abundance and distribution of old-growth in the future. I am one of the millions of Americans who care deeply about mature and old-growth trees and forest conservation across all national forests.

The severe loss of biodiversity and the worsening impacts of climate change require solutions that match the magnitude of the threats we face. We need transformational change, not the status quo or incremental steps towards future outcomes. Done properly, this nationwide forest plan amendment could have a meaningful, near-term impact on confronting the climate crisis and on addressing the loss of biodiversity, and we look forward to seeing this potential realized.

The EIS must analyze alternatives with significantly strengthened protections of old-growth. As written, the amendment would still allow for numerous unacceptable exceptions for commercial logging of old-growth. The Forest Service should, with very limited exceptions, end felling of old-growth trees everywhere and cutting in old-growth stands where fire is infrequent. And, in all events, the amendment language must be strengthened to completely eliminate the commercial exchange of old-growth trees. We also urge the Forest Service to remove the Tongass old-growth logging exemption from any further analysis in the upcoming EIS. Any financial incentive to log these trees will undermine the goals of the amendment and the desired climate and conservation outcomes of EO 14072.

We also urge consideration of provisions to preclude reliance on arbitrarily restrictive definitions that artificially limit the amount of old-growth forests ultimately protected by the proposed action. The Forest Service should ensure the amendment requires definitions that are fully inclusive of all old-growth conditions, simple, and easily operationalized in the field.

And, consistent with the recognition in the notice of the importance of expanding the distribution and abundance of old-growth forests, we encourage you to consider in the EIS process alternatives for conserving the values of mature forests, including their value as future old-growth. Among other things, national forests in certain geographic areas, for example national forests east of the 100th meridian, have virtually no old-growth left due to logging which makes protecting mature forests all the more important. While there are certainly other threats to our older forests to be managed (such as wildfire), the agency-acknowledged threat of ecologically inappropriate logging remains wholly and directly under USFS's control.

The national forest plan amendment must also incorporate strong monitoring and accountability measures, both for tracking the abundance and distribution of mature and old-growth forests, and for ensuring their value as a natural carbon sink is optimized over time; and reduce the nature gap by ensuring that frontline communities and nature-deprived communities directly benefit from the proposed amendments, including through the development

of an "equity layer" to the United States Forest Service Climate Risk Viewer that demonstrates these benefits across the landscape and across diverse communities.

Thank you for the opportunity to provide feedback on this important effort. Given the outstanding role mature and old-growth trees and forests play in fighting the climate and biodiversity crises, it is vital that America establish the strongest possible safeguards for their conservation. We encourage the Forest Service to maintain its timeline for this amendment process, and robustly engage with Tribal Nations, the public, and other stakeholders.

Sincerely,

Stephen Fuller-Rowell  
Eugene, Oregon