

Data Submitted (UTC 11): 2/2/2024 11:13:01 PM

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Comments: 2/2/2024.

Dear Chief Moore,

As a longtime resident of southern Oregon I am writing you to thank you for recognizing the importance of protecting mature and old-growth forests and trees across the United States which is vital for climate resilience and ecological sustainability. These forest and trees must be protected across all National Forests and BLM. We urge the Forest Service and BLM to enact durable and enforceable protections for the remaining old-growth forests on public lands across the country. We ask that your efforts also safeguard mature forests and trees to increase the abundance and distribution of old-growth in the future. To meet President Biden's goals for tackling the climate crisis and the biodiversity crisis, it is imperative that both agencies prioritize the protection of mature and old-growth forests and trees on public lands.

The dual crises of severe loss of biodiversity and the worsening impacts of climate change require solutions that match the urgency and magnitude of the threats presented. National forests in certain geographic areas, like 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. We must therefore meet the moment and adequately address this threat.

We also urge consideration of provisions to preclude reliance on arbitrarily restrictive definitions that limit the amount of old-growth forests ultimately protected by the proposed action. The Forest Service should ensure the amendments require definitions that are clear, science-based, site-specific, and inclusive of all old-growth conditions.

The environmental impact statement (EIS) for the Forest Service's national forest plan amendment must analyze alternatives with significantly stronger protections for old-growth trees and forests. As written, the amendment would still allow numerous unacceptable exceptions for commercial logging of old-growth. The Forest Service should end felling of old-growth trees everywhere with only very limited, science-based exceptions. 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 EIS. Any financial incentive to log these trees will undermine the goals of the amendment and the desired climate and conservation outcomes of Executive Order 14072.

On going logging projects should be included. They are a threat to older federal forests and trees. There are numerous logging projects across the PNW that target mature and old-growth trees that underscore this point. These forests collectively contain the bulk of the carbon already stored in federal forests and they continue to sequester carbon at high rates. If continued logging of these trees is allowed, the vital role they play in the fight against climate change will be eliminated.

Done properly, this nationwide forest plan amendment can meaningfully confront the compounding climate and biodiversity crises. Please act quickly to protect mature and old-growth forests and trees. These forests are worth more standing. Our older forests are also critical for addressing the biodiversity crisis. These complex ecosystems provide vital and unique habitats for imperiled fish and wildlife species that are facing extreme stress as the climate crisis unfolds. Intact forests are crucial for their continued survival. While there are certainly other threats to our older forests, including uncharacteristically severe wildfire and drought, the threat of logging is fully under your control.

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 the US establish the strongest possible safeguards for their conservation. We encourage the Forest Service and to maintain its timeline for this amendment process and robustly engage with Tribal Nations and Indigenous communities and the public as it unfolds.

Sincerely, Romain Cooper