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Comments: Dear Jacqueline Buchanan, US Forest Service, Regional Forester for the Pacific Northwest Region:

I submit this comment on the draft Northwest Forest Plan Amendment. I want to urge that this amendment include the strongest possible protection of mature and old-growth forests. It is critical to conserve mature and old-growth trees for the future for their multiple ecosystem services. This can be done while also providing a mix of benefits for today, balancing timber harvest with fish and wildlife habitat, recreation, clean water, and climate mitigation, rather than prioritizing logging as in the past. This balance is even more urgent at this time when the catastrophic effects of climate change on forests are all around us, clean air and water are increasingly under challenge, and more and more species are becoming threatened or endangered.

As a resident of Oregon, I know that Northwest Coastal and Cascade Range forests have some of the world's highest capacity to store carbon. Indeed, current science supports large forest reserves to sequester carbon, provide wildlife habitat and foster biodiversity. As a small woodlands owner surrounded by industrial and state forest land, I see up close every day the destructive effects of current logging practices, in contrast to practical, sustainable alternatives that can provide fiber and livelihoods while preserving forest values and mitigating environmental damage. Management of National Forests must protect the many benefits that only healthy mature forests can provide: clean air and water, carbon storage, fish and wildlife habitat and recreation.

Despite the Biden Administration's executive order and stated goal to conserve older forests as a critical part of climate mitigation, within the last two years the National Forest Service has proposed the logging of thousands of acres of mature and old-growth forest (e.g., the proposed Flat Country timber sale in Oregon's Willamette National Forest). Such proposal must stop immediately, and must be clearly proscribed in the Northwest Forest Plan Amendment. Given the tiny fraction of old-growth forest remaining, no future cutting of these precious forests should be allowed, with extremely limited exceptions based solely on solid science. These forests and their unique value can never be replaced. Furthermore, given the loss of almost all of the Northwest's original old-growth forest, mature forests must also be protected as the old-growth forests of tomorrow.

In the six National Forests in Oregon, on 3% of the trees are mature, with trunks more than 21 inches in diameter, but they account for over 40% of the carbon stored above ground (Law & Moomaw, 2021). Indeed, across the globe, half of all forest carbon is held in just the largest 1% of trees (Lutz et al., 2018), emphasizing the outsized impact of their conservation on carbon sequestration. Furthermore, forests capture over 30% of carbon dioxide emissions, and it has been estimated that this percentage could be doubled by ending the razing of forests and particularly the preservation of mature forests (Erb et al., 2018). Thus, preservation of the Northwest's existing mature and old-growth forest is an exceptional opportunity to mitigate climate change with low cost and substantial short-term benefit. Another benefit of mature and old-growth forests is their ability to withstand the ever-increasing threats of climate change, including their resistance to wildfire.

Many studies have confirmed the urgent nature of the climate crisis, and the narrowing time window for effective mitigation. We have only 10-20 years to drastically reduce carbon emissions and increase carbon storage. The permanent preservation of mature and old-growth trees provides one of the most effective strategies to reduce climate impacts in the near term. The Northwest Forest Plan Amendment must give the strongest possible priority to these considerations.

Thank you for the opportunity to provide input on the proposed Amendment.

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References

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Lutz JA, Furniss TJ, Johnson DJ, et al. Global importance of large-diameter trees. *Global Ecol Biogeogr.* 2018; 27: 849-864. <https://doi.org/10.1111/geb.12747>

Erb, KH., Kastner, T., Plutzer, C. et al. Unexpectedly large impact of forest management and grazing on global vegetation biomass. *Nature* 553, 73-76 (2018). <https://doi.org/10.1038/nature25138>