

Data Submitted (UTC 11): 7/17/2024 9:08:06 PM

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Comments: Dear Chief Moore,

This comment letter conveys my deep concerns with the National Old Growth Amendment Draft Environmental Impact Statement. The final record of decision needs significant improvement to ensure meaningful protections for the nation's remaining old growth, while also laying a foundation to increase the abundance and distribution of old growth for future generations.

When I served as Deputy Chief NFS, I recall Chief Dombeck's plans to protect old growth, following on the heels of the Roadless Conservation Rule. The Bush administration had no appetite for this, and the FS has slept on the issue for over 20 years. Would YOU have pursued this current proposal absent the EO?

Currently, mature and old-growth trees are still targeted for commercial logging. While this may be technically allowed under EO14072, such logging violates the spirit of the Order. I've waited in vain to see evidence that the FS embraces the opportunity to enhance M/OG's future on our NFs. No interim protections were put in place while your proposal was pending. Deputy Chief French's belated review of such projects has been limited, with virtually no public accountability, and is seemingly cloaked in secrecy.

None of the proposed alternatives are likely to result in the sweeping needed, given the importance of our older trees and forests in fighting the climate and biodiversity crises. The amendments must end the felling of old-growth trees across our national forests and end cutting in old-growth stands where fire is infrequent. They must also end the commercial exchange of old-growth trees to ensure there are no perverse opportunities to monetize a rare and valued ecological resource.

Threats to our federal forests including those posed by a changing climate, and your vegetation management projects. Logging old-growth trees to save stands from potential threats is a false solution - they are worth more standing! OG trees and forests: 1) sequester and store significant amounts of carbon; 2) provide essential habitat; 3) safeguard watershed integrity; 4) boost ecosystem resilience to fire; and 5) help regulate forest temperature. Logging them eliminates these benefits at the expense of forest ecosystem health.

Ironically, the preferred alternative includes numerous opportunities for the agency to log these essential trees. Why, given our climate change crisis, are you incentivizing removal? At a minimum, you should require that a forest's old-growth status be at least maintained. All alternatives explicitly allow line officers the discretion to manage old growth out of existence in pursuit of "proactive stewardship" goals. And they contain ambiguous language that could be used to justify continued commercial logging of old growth in the Tongass National Forest. The final policy must remove ambiguity and correct these deficiencies.

The final record of decision must also establish strong monitoring and accountability measures, ensure the climate benefits of these forests are analyzed, weighed as important decision variables, and - ultimately - to bend agency culture toward protection and away from exploitation.

The proposed policy does recognize the importance of restoring the abundance and distribution of old-growth across the country. But I fear that your policy prescriptions will not secure the significant management shifts necessary to accomplish that goal. Without clear protections for mature forests aimed at recruiting old growth, you create a gaping hole that will result in falling short of EO 14072's goals. Mature forests and trees - future old growth - must be protected from the threat of commercial logging in order to address the many millions of old growth that have been lost. I recognize that was a different era, but you now have an opportunity to restore much of the grandeur that was lost. Protection of mature forests can be accomplished in a manner that is consistent with addressing the threat of fire. These are not mutually exclusive goals. In fact, they can be viewed synergistically. They must be protected to aid in the fight against worsening climate change and rampant biodiversity loss. And they must be protected to ensure that our children are able to experience and enjoy old growth.

Given the outstanding role mature and old-growth trees and forests in NFs play in fighting the climate and biodiversity crises, it is vital that America establish meaningful safeguards for their conservation. The draft policy fails to achieve this. The final policy must ensure that old-growth trees stay in the forest and do not get reduced

to boards. Failure to do so undermines the objectives of this amendment, contravenes the direction of EO 14072, and ignores robust public sentiment in support of protection.

Sincerely,

/s/Jim Furnish

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