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Title: Forest Policy Director

Comments: Dear Chief Moore,

We are taking this opportunity to express our concerns about the Draft Environmental Impact Statement on Mature and Old Growth Forests.

During the 1940's, 50's and 60's the United States Forest Service's all-fires-out-by-10- am policies had negative effects on forest health. Today we know that fire is an essential element in the life of forests. The Service recognized over time that its management was wrong and needed to change. We applaud its current acknowledgement of indigenous communities' cultural knowledge about the value of fire on the landscape. In its high production era, the United States Forest Service saw all old complex growth stands as decadent and unproductive, needing to be removed and replaced with rapidly growing young trees of a single species. The Forest Service went as far as turning forested mountain sides into terraced landscapes in service to its mission to produce lumber at an unsustainable rate. The result was destruction of habitat critical to the survival of dozens of threatened and endangered species. The National Environmental Protection Act and the Endangered Species Act forced the Service to re-examine its management practices and realize they were on the wrong track. Today we recognize the critical role that old growth plays in securing biodiversity.

Twenty-five years ago, climate scientists began warning us about the dangerous possibility of a rapidly warming planet. The Service has been slow to recognize the critical role our forests play in carbon sequestration and climate mitigation. We see the DEIS on Mature and Old Growth as an important step in once again recognizing that our forest management practices have been on the wrong track and need to change. Mature and old growth forests continue to be logged on our national forests. Here in the Pacific Northwest our old growth forests are among the most carbon dense in the world. These forests also help us fight the biodiversity crisis.

Our concern is that the DEIS does not go far enough and allows for too much of the old business-as-usual forestry and will lead to more logging in the name of forest resilience. Generally, trees 80 years and older are more fire resistant and should not be cut to reduce wildfire risks. The DEIS would allow commercial logging labeled as "thinning" to reduce fuel loads. Overly aggressive thinning breaks up the canopy and allows forests to dry out, creating an even greater risk of wildfire. Canopy cover should be an important component when making decisions about the need to thin some stands.

We understand that in some rare circumstances, such as for public safety, that older trees need to be cut; in such cases those trees should be left on the forest floor. We also understand that here in the Pacific Northwest we need to manage our moist west side forests differently than our dryer east side forests. Yes, ecologically appropriate restoration is needed on those east side forests, but that should never include logging old growth trees.

Mature and old-growth trees and forests protect our climate and provide critical environmental and socioeconomic benefits by:

- *absorbing tremendous amounts of carbon and storing it for centuries,
- *boosting resilience to wildfire,
- *regulating temperatures of soils and waters,
- *filtering our sources of drinking water,
- *sheltering wildlife,
- *providing us sources of beauty, awe, and wonder.

Given these many benefits, logging mature and old-growth forests makes no sense. We encourage you to strengthen the Forest Service's monitoring and accountability measures. Increase public engagement in forest planning so that trust between the Service and the public can continue to grow.

Sincerely,

Joseph Youren
Forest Policy Director
Audubon Society of Lincoln City