

Data Submitted (UTC 11): 9/7/2024 4:00:00 AM

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Title:

Comments: Re: Land Management Plan Direction for Old Growth Forest Conditions Across the National Forest System #65356

Comment prepared by Rachel Smolker, Ph.D.

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I am writing on behalf of Biofuelwatch, an international organization with staff in the USA and UK. Our organization campaigns against large scale bioenergy, in particular wood pellets and chips for power generation, falsely presented as and subsidized as "renewable energy". Protecting forests is an effective climate solution while burning them releases more greenhouse gases, undermines potential for C sequestration, and destroys biodiversity. As part of our campaign efforts we advocate for protection of natural forests.

We strongly support the intent of the Biden administration's Executive Order to protect mature and old growth forests. Not long ago, mature and old growth forests blanketed much of our nation, but have drastically dwindled to a small number of remnant pockets under severe logging pressures. It is imperative, for the sake of current and future generations, that the remaining stands of Old Growth be left standing without any logging interference whatsoever. Rather, these forests should be left under the rule of nature, not logging interests or "managers". All logging of old growth forests should be halted altogether immediately.

Supporting the regeneration of old growth forests is key to combatting climate change and biodiversity loss. The protection of mature forests is a critical step toward this goal. Mature forests must be left alone, governed only by the forces of nature to eventually provide new additional stands of old growth forest.

The proposals put forward by the forest service in their DEIS are sadly lacking in real protections, and rather leave monumental loopholes that allow further destruction and fail to meet the intent of the Executive Order.

The DEIS leaves far too many openings for discretionary decision making concerning what counts as "old

growth" and favors ambiguous terminology that will not prevent logging or even supports logging referred to as "proactive management". Decades of experience have shown that forest "management" is driven by commercial, not ecological principles. Old growth forests need to be freed from human interference, with "management" determined solely by natural processes.

The DEIS utterly and sadly fails to provide real protections for mature forests. By failing to provide overarching definitions of forest status, the definitions are left to local and regional forest agency discretion, again creating gaping opportunities for continued logging and destruction of both mature and old growth forest. This is unacceptable especially when financial incentives still drive the delivery of old growth trees to mills for sale! No old trees should be sold.

It is truly shocking to find that the DEIS essentially ignores the imperatives for forest protection and regeneration that have been centrally featured under international climate and biodiversity treaty negotiation processes. Within the Convention on Biological Diversity and the Convention on Climate Change, language and processes have been debated and put in place for global forest protections. These international treaties on climate and biodiversity have long sought to establish and implement such protections in acknowledgement of the important role of natural forests, and especially old growth and mature forests. Regeneration of forest cover is in fact considered to be one of the only truly known and effective measures currently available to make significant progress toward drawing down atmospheric CO<sub>2</sub> concentrations. The US Forest Service and BLM should not ignore the history and initiatives of global efforts to protect forests.

We are experiencing increasingly dire impacts of climate change, threatening the health and well being of people all over the world. Decisions about how our public lands - including forests - are treated must be primarily in service of public interests, not private profits. The highest value to the public for our forests is in service of climate mitigation and biodiversity protection, as well as their value for aesthetics and recreation.

Many people go to great lengths to provide themselves and their children with the opportunity to experience the grandeur of old growth forests. It is our opportunity to see just what natural forests can be, free from chainsaws and human "management". The Forest Service and BLM have a duty to future generations to ensure that old growth forests, existing and future, remain standing and increase in area. History will look back on this moment and the decisions we make. We ask: what legacy does the Forest Service and BLM wish to leave? One in which vast loopholes, ambiguities and failures of implementation have all but eliminated the special majesty of old growth forests? Or one in which such forests remain and expand to fulfill their social and ecological values for the benefit of all?