

Data Submitted (UTC 11): 9/13/2024 4:00:00 AM

First name: John

Last name: Keogh

Organization:

Title:

Comments: Comments on the National Old-Growth Amendment, Draft Environmental Impact Statement

The Forest Service should adopt a much strengthened version of Alternative 3, with modifications.

This DEIS fails to address Executive Order 14072 (especially "Section 2. Restoring and Conserving the Nation's Forests, Including Mature and Old-Growth Forests") and fails to fulfill President Joe Biden's legacy to protect the nation's last remaining mature and old forests.

I speak for myself and my family, life-long residents of western Oregon. We know that mature and old-growth forests are a key solution to climate mitigation: they increase resilience to wildfire; absorb and store massive amounts of carbon; protect drinking water; moderate temperatures; and shelter wildlife. We lose these benefits when we log our mature and old trees.

Yet, this DEIS allows older trees to be logged and sent to the mill, a practice that increases vulnerability to fire in western Oregon and Washington and in many other forests throughout the nation. This proposal allows the US Forest Service to manage the decline and disappearance of our oldest forests in the name of so-called "proactive stewardship," a dangerously vague term that will justify continued commercial logging of older forests throughout the Pacific Northwest, including the Tongass National Forest.

Cutting down old trees does not save them from fire. Logging accounts for 80% of tree-death in the Pacific Northwest. Fire accounts for 10%. Yet the DEIS does not mention logging as a threat to mature and old-growth forests.

This DEIS ignores the obvious fact that mature forests contribute fire-resistance, complex biodiversity, and climate mitigation, only if they are not cut down as they develop into old-growth. The idea of "mature" forests, significant throughout the Executive Order, has been eliminated from this DEIS.

The final record of decision should:

1. Explicitly protect the nation's last remaining mature and old forests.
2. Explicitly plan for the differences in fire ecology between dry and moist western forests.

3. End logging and thinning in mature and old forests within moist forests of western Oregon and western Washington.
4. End logging mature and old-growth trees in all national forests.
5. End any commercial sale or exchange of older trees, even in cases where an old tree is cut, say, for public safety.

Failure of the Record of Decision to protect our nation's oldest forests goes against the objectives of this amendment, against the legacy of President Biden's Executive Order, and against the will of the people, while favoring the profits of a few.