

Data Submitted (UTC 11): 9/15/2024 4:00:00 AM

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Organization: Mobilizing Climate Action Together

Title: Forestry and Natural Lands Lead

Comments: To: Chief Randy Moore, U.S. Forest Service

Re: USDA Old-Growth Initiative

Date: September 14, 2024

Dear Chief Moore,

As the Forestry and Natural Lands Lead for MCAT, Mobilizing Climate Action Together, I am especially concerned about the weaknesses apparent in the recently issued DEIS. MCAT is a community of volunteers working to ensure that Oregon builds a healthy climate and green-energy economy for future generations. One of our core aims is promoting climate smart forestry, which we define as optimizing carbon sequestration and storage and forest resilience while minimizing greenhouse gas emissions. Key practices include growing trees longer, protecting mature and old growth trees and ensuring a diversity of species, ages and structures.

My book, *Forest Under Siege, The Story Of Old Growth After Gifford Pinchot*, was recently published by Washington State University Press and I hope you will read it. In my book I examine 100 years of forestry in the Pacific Northwest's national forests through the lens of what happened on the founder's namesake forest, the Gifford Pinchot National Forest. The primary aim of the USFS during the 45 years after WWII was to liquidate all the old growth. That aim was almost achieved - very little was left by the early 90s. One result was that during that period our national forests in the Pacific Northwest were a carbon source and thus contributing to the climate crisis.

Fortunately, that reality changed with the implementation of the Northwest Forest Plan such that our forests are now carbon sinks. Our forests here are among the most carbon dense in the world, and they also are helping us address the biodiversity crisis. Our national forests have the extraordinary potential to help mitigate the climate crisis by drawing down and storing vast amounts of carbon. Clearly, President Biden's Executive Order is intended to achieve that aim. Unfortunately, the DEIS does not sufficiently protect our old growth trees and forests. In addition, the DEIS contains language that arguably could justify ongoing liquidation of old growth forests in the Tongass National Forest. That is not acceptable.

I ask you to strengthen the final record of decision so that all of our remaining old growth in national forests are protected. In addition, most of our mature forests need to be allowed to become old growth so that my children can experience the kind of forest my grandfather would have experienced had he explored what became the GPNF in 1900.

The current DEIS has way too many loopholes - too much discretion is given to forest managers and to date that has led to ongoing logging of old growth trees. That is not acceptable now nor is it in the future. In some rare cases, e.g., public safety, old growth trees may need to be logged. If so, they should be left on the ground to serve as nurse logs.

One of the most important actions that the final amendments must address is to lay the foundation for our mature forests to become old growth forests. This action will go a long way to make amends to the essentially successful goal that the USFS had after WWII, which was to liquidate all old growth in the Pacific Northwest (of course, that had already been achieved on the east coast and upper Midwest). Our mature forests and trees need to be preserved and not commercially logged so that we will recover old growth that was eliminated as a result of past misguided forestry practices.

Another issue that I want to address is that of wildfires. Older forests are much more resistant to wildfires and they help us address the threats that are increasing as a result of climate change, especially flooding and droughts. Of course, if we look back to the founding of the USFS, one of Pinchot's primary aims was to, as he put it in his Use Book, "to regulate the flow of streams." He was very aware of how cut over (now burned over) lands led to increased flooding and landslides. I do want to acknowledge that fire is essential in helping to restore older forests in frequent fire landscapes. You need to be clear in the distinction however with landscapes that historically experienced infrequent fires, i.e., the moist forests in the Pacific Northwest. The most important action needed with these forests is to keep fire away from older forests in those wetter landscapes.

One aspect of the DEIS that is especially disturbing to me is the emphasis on "active management" and "proactive stewardship" of old growth forests. The reality is that in many cases the best thing you can do is to just leave our old growth forests alone. In my book I describe how "biological legacies - for example snags and downed trees left after a disturbance - need to be maintained and natural stand development processes allowed to unfold naturally" and that "the adoption of this leave it alone strategy after major disturbances is especially important now as the West experiences ever-increasing major forest fires as a result of climate change." Forest Service leaders need to be clear that what should be described in the final EIS as "no active management" is quite often the preferred approach.

To summarize, this DEIS does not address the most vital need, which is to conserve our existing old-growth forest. The DEIS should make explicit that this is the overriding aim! Please list this goal first and foremost in the final EIS. In the next to last chapter in my book, I state that going forward Forest Service leaders need "a simple yet profound understanding - that the model for achieving Pinchot's vision of providing for the greatest good for the greatest number in the long term is the natural forest ecosystem." I believe strongly that if Gifford Pinchot were alive today he would be thrilled if the final EIS truly protects the mature and old growth forests across these forested lands he cared so strongly about.

Sincerely,

Rand Schenck

On behalf of the MCAT Steering Committee,

MCAT, Mobilizing Climate Action Together.