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First name: Michael

Last name: Graney

Organization:

Title:

Comments: We urge the USFS to significantly strengthen the final record of decision to ensure meaningful protections for the nation's remaining old growth, and to lay the foundation to increase the abundance and distribution of old growth for future generations.

Currently, the proposed policies allow forest managers to do the bare minimum to preserve old-growth forests and creates loopholes that could lead to the continued or even increased logging of old-growth trees. Here in Oregon, we regularly see mature and old-growth trees targeted for commercial logging. Logging old-growth trees to save stands from potential threats is a false solution - they are worth more standing.

Protecting our remaining mature and old-growth forests and trees on federal lands represents one of the simplest and most cost-effective climate policies the U.S. can deploy at scale. But time is running short: the climate and biodiversity crises are growing exponentially worse and it is critical that you fulfill the President's directive to provide lasting protections for these trees.

YOU have a chance to take action now! As you well know, The U.S. Forest Service is working to amend every national forest plan in the country to protect old growth, which could become one of the most meaningful safeguards for federal forests that we have seen in decades. What is in question now is whether USFS actually wants to protect old growth per the President's directive, or revert to their old default position of subsidizing the timber industry by cutting the oldest trees first.

For the purpose of protecting these climate-critical trees and forests from logging, "mature" should be defined as 80 years and older. By setting logging limits using this definition, federal agencies will establish a safety net that assures minimum protection of the ecological and carbon benefits these older forest elements provide for future generations. These older forests and big trees collectively contain the bulk of the carbon already stored in federal forests and they continue to sequester carbon at high rates far into the future. They also provide, across forest types, vital habitat and biodiversity benefits, and important sources of drinking water for communities. Critically, protecting mature forests and trees today will provide the foundation to recover old-growth ecosystems which have largely been lost to logging across the landscape.

The Draft Environmental Impact Statement fails to protect old-growth trees and forests. The proposal allows old-growth trees to be sent to the mill and allows agency staff to manage old-growth out of existence in pursuit of "proactive stewardship" goals. The draft also contains ambiguous language that could be used to justify continued commercial logging of old growth in all the national forests of all western states.

Cutting down old-growth trees to save them from potential threats is a false solution. They are worth more standing.

Mature forests and trees - future old growth - must be protected from the threat of commercial logging in order to

recover old growth that has been lost to past mismanagement. Protection of mature forests can be accomplished in a manner that is consistent with addressing the threat of fire. They must be protected to aid in the fight against worsening climate change and biodiversity loss. And they must be protected to ensure that our children are able to experience and enjoy old growth.

To successfully achieve protection for old-growth forests, the Final Environmental Impact Statement must:

Eliminate exceptions and end all logging of old-growth trees in National Forests

End the cutting of old-growth trees in all national forests and forest types and end the cutting of any trees in old-growth stands in moist forest types.

* Prohibit sending any old-growth trees to the timber mills. The economic incentive for logging old-growth must be removed. If the logged tree cannot be sold or exchanged, it will likely prevent all but truly rare removals of old-growth trees.

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* Set the stage for durable protections for mature trees and stands. This is paramount to the future of old-growth. Mature forests and trees - future old growth - must be protected from the threat of commercial logging in order to recover old growth that has been lost to past mismanagement.

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* Be consistent with the need to address wildfire. Protecting older trees and forests can increase forest resilience to wildfires, and combat climate-change related impacts such as flooding and drought. Timber harvest greatly reduces forest resilience to wildfires. The argument that timber cutting helps reduce fire danger and fire spread is BS and points to the fact that USFS is a wholly owned subsidiary of the timber industry.

Given the outstanding role mature and old-growth trees and forests in national forests play in fighting the climate and biodiversity crises, it is vital that America establish meaningful safeguards for their conservation.