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Comments: Dear President Biden, Agriculture Secretary Vilsack, and U.S. Forest Service Chief Moore,

I write to express my deep concern with the Draft Environmental Impact Statement (DEIS) for the Forest Services' proposed Amendment to Land Management Plans to Address Old-Growth Forests Across the National Forest System. In compliance with the President's Executive Order 14072 regarding old forest conservation, the President's commitments to the Paris Climate Agreement, and the Glasgow Leaders' Pledge to end deforestation and forest degradation, we urge you to fully protect all mature and old-growth forests (MOG) on national forest lands from logging. Executive Order 14072 noted that MOG forests "play an irreplaceable role in reaching net-zero greenhouse gas emissions" and promised to "retain and enhance carbon storage" in MOG forests. The DEIS does not comply with these promises and does not provide a reasonable range of alternatives, as follows.

By allowing the sale and removal of MOG trees, not a single acre of these biodiverse, carbon-rich forests is protected from logging, which will further degrade them.

Mature forest protections were omitted, which is most of the carbon-rich forests in the Western US and nearly all mature forests recovering from logging in the Eastern US.

Logging levels, and carbon removal, would nearly double in MOG forests (DEIS Threats Analysis, Fig. 19), making this more of a logging plan than a forest protection plan.

Unacceptably downplays health impacts and cumulative effects of increased logging, especially to environmental justice communities that are disproportionately impacted.

Promotes logging for "energy production" (DEIS, p. 75) that will emit 5.2 x more nitrogen oxides; 30 x more volatile organic compounds; 7 x more ammonia; 3.2 x more sulfur dioxide; 12.5 x more PM2.5 particulates, and 38% to 65% more CO2 into the atmosphere than burning coal.

None of the alternatives faithfully implement President Biden's April 2022 Executive Order on MOG, which promised to "conserve America's mature and old-growth forests on Federal lands." Increased logging levels in the plan run contrary to that promise.

Hypothetical modeling studies and discredited assumptions were used to promote the false notion that removing carbon from forests through logging will increase forest carbon storage (DEIS, pp. 75-76; DEIS Ecological Impacts Analysis, p. 44). Hundreds of climate scientists and ecologists have debunked these false claims.

Omits research findings that thinning emits about 3 times more CO2 per acre than wildfire alone, for equal energy produced, and that thinning kills significantly more trees than it prevents from being killed.

Nowhere in the DEIS or its associated reports does the Forest Service include an analysis of the impact of its increased logging of mature and old-growth trees and forests on forest carbon storage and carbon flux (gross emissions especially). The Forest Service's own research shows that increased logging would substantially undermine atmospheric carbon draw down and compromise our ability to achieve net-zero emissions, while protecting forests from logging would reduce atmospheric carbon by 84 million tons of CO2 every year. Further, the Threats Analysis omits mention of field-based research that found even big fires only consume less than 2% of tree carbon, while thinning of MOG trees removes far more carbon-most of which is quickly emitted into the atmosphere and only a small portion of which ends up as lumber.

Assumptions about fire are not based on best available science as there is no mention of the dozens of scientific studies, including by many US Forest Service scientists who have found that denser, MOG forests tend to burn at lower severities, while thinning and other logging conducted ostensibly as hazardous fuels reduction often exacerbates wildfires by eroding the cool, shady microclimate provided by denser forests.

I firmly disagree with the agency's assumption that mature and old-growth forests must be logged to prepare them for fire, as many studies by the Forest Service's own scientists show managed wildfire or prescribed fire

can be applied, during natural fire season, without any prior tree removal. Rather than spending large sums of Infrastructure Act funds and other taxpayer money on highly expensive mechanical logging operations that degrade MOG forests, I urge you to instead redirect these efforts to helping communities become fire-safe, including defensible space pruning for homes adjacent to national forests.

Thank you for initiating this process but I urge you to fix the serious problems with the DEIS, and fully protect MOG forests from logging, as over 200 scientists have urged.

Doing so would leave a legacy gift of your Administration to the nation and the planet.

Sincerely,

Valerie Krull