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Title:

Comments: Thank you for the opportunity to comment on your important work on the National Old-Growth Amendments (NOGA). President Biden's Executive Order 14072 called on the Forest Service and Bureau of Land Management to conserve mature and old-growth forests as a climate solution. We support that effort.

Given the relentless pace of climate change, the importance of mature and old-growth forests has never been more clear.

Lasting protections for mature and old-growth forests are crucial for carbon storage, clean water and biodiversity. Protecting our mature forests and allowing them to become old-growth is one of the most cost-effective climate change mitigation strategies available to us. Here in the Pacific Northwest, trees in our temperate rainforest are capable of aging to 800 years, continuing to sequester and store carbon while providing essential habitat.

Almost half of National Forest System Lands are mature forests suitable for such protection. These mature forests, which should be explicitly defined as 80 years old and older, represent our Nation's best chance to restore past old-growth lost to logging. Mature forests provide foundational carbon sequestration and storage, wildlife habitat, and essential watersheds that should be preserved for future generations. To do this, they must be spared from commercial logging. The next iteration of your NOGA work should expand the plans for recruitment of mature forests to become future old-growth and set firm targets for stored carbon in both mature and old-growth forests.

A recent USDA Secretarial Memorandum stated that "A primary threat to old-growth stands on national forests is no longer timber harvesting, but rather catastrophic wildfire and other disturbances resulting from the combination of climate change and past fire exclusion." This is inaccurate. Commercial logging, often cloaked with such euphemisms as "restoration", "hazardous fuels reduction" and "wildfire mitigation," is a greater threat to mature and old-growth forests. Thinning to prevent wildfires is a shot in the dark: weather, not fuel, drives large fires. Even-age plantations burn hotter than natural forests and older trees are more fire resistant than younger ones. Commercial logging makes fire danger worse, and is a greater source of carbon emissions than the wildfires themselves. We urge you to increase Tribal inclusion in wildfire prevention, in particular Tribal roles in beneficial fire stewardship.

In order for the NOGA to be fully effective, the US Department of Agriculture and US Department of Interior should quickly begin a rule-making process with ample opportunity for public comment.

Finally, while we applaud the removal of the explicit Tongass exemption from the Draft EIS, unambiguous

language is needed that cannot be used to justify continued commercial logging of old-growth in the Tongass. We urge you to clarify the current language. The Tongass National Forest is our Nation's old-growth crown jewel and must be preserved. Commercial logging of old-growth in the Tongass is unacceptable.

In summary, we call for:

- 1) An explicit definition of mature forests as those 80 years old and older.
- 2) Expanded plans for the recruitment of mature forests to become future old-growth.
- 3) Firm targets for stored carbon in mature and old-growth forests.
- 4) Increased Tribal roles in beneficial fire stewardship.
- 5) A rule-making process with ample opportunity for public comment.
- 6) Unambiguous language prohibiting old-growth logging in the Tongass National Forest.

Respectfully yours,

350 Seattle

350 Seattle works toward climate justice by organizing people to make deep systems change: resisting fossil fuels; building momentum for healthy alternatives; and fostering resilient, just, and welcoming communities.