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Comments: None of the alternatives include language to prohibit logging of old growth, only a vague statement of desired condition. The final plan should end the cutting and selling of old-growth trees on public lands. These forests can be effectively managed without selling or commercially exchanging those trees. End of story.

Mature forests and trees need explicit protection. The country has lost most of its old growth to over a century of logging. Mature forests provide the bulk of the climate benefits on federal forests and are the nation's future old-growth.

We need solutions that match the magnitude of the threats we face. Conserving mature and old-growth forests on federal lands is a critical natural climate solution that will have a meaningful impact on the climate crisis and biodiversity crisis. We have a moral imperative to act boldly for future generations.

There are logging projects in the pipeline that threaten mature and old-growth trees. The Forest Service included an elevated review process for proposed projects that contain old-growth in their announcement, but there is still a pressing need for the agency to follow through and ensure current projects are re-evaluated to reverse the loss of old-growth.

The final record of decision should adopt a modified Alternative 3:

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

- End any commercial exchange of old-growth trees. Even in the rare circumstances where an old-growth tree is cut (e.g. public safety), that tree should not be sent to the mill. (Alternative 3 includes a "no commercial exchange" provision.)

- Remove the exception that allows for "de minimis" logging of old-growth trees.

- Eliminate the agency discretion to manage old growth out of existence in pursuit of "proactive stewardship" goals.

Alternative 1 is the required "no action" alternative.

Alternative 2 is the agency's preferred alternative. It is grounded in a theory of "proactive stewardship" of old-growth forests for "climate adaptation." In the name of such "stewardship," the agency retains wide discretion to log old-growth trees and send them to the mill.

Alternative 3 restricts "timber resources and timber resource management" (commercial logging) in old growth forests, but still allows the felling of old-growth trees.

Alternative 4 permits timber production and commercial logging in old growth forests without requiring ecological or restoration purposes .

Alternatives 2, 3, and 4 all contain language with similar approaches for what the Forest Service is calling "Adaptive Strategies." These strategies are the only areas that include any reference to mature forests. There are no standards protecting mature forests.

All alternatives presume that old growth forests need to be actively stewarded in some fashion for them to persist. Active stewardship, including logging, is the presumed solution to address all threats.

Durability: Nothing appears to stop the agency from pursuing management activities that take the forests out of old growth status, at which point any protections offered by the NOGA would no longer apply. All alternatives explicitly allow line officers the discretion to manage old growth out of existence in pursuit of "proactive stewardship" goals . The alternatives also contain ambiguous language that could be used to justify continued commercial logging of old growth in the Tongass National Forest. And line officers appear to have the discretion to modify NOGA protections in individual forest plans through the forest plan amendment or revision process.

Mature: It is extremely disappointing that the agency has ignored public calls to adopt standards for protecting mature trees and forests. The adaptive strategy directs National Forests to look for forests for OG recruitment, but it's all left to local discretion. Part of the "purpose and need" of this policy is ecological integrity. Without specific mature forest protections, the agency will fail to recover the abundance and distribution of old-growth forests and will undermine its ecological integrity objectives.

Definitions: They're using individual forest plan definitions or regional ones (where plans don't have a definition). First, these definitions are generally narrowly written as to exclude much forest and trees that are, in fact, old growth. Second, line officers a lot of wiggle room on how to apply the NOGA. Part of the "purpose and need" of this policy is a consistent approach to old-growth conservation. The extreme discretion and flexibility given to local managers undermines these objectives.

De minimis: While the Tongass is no longer singled out for exemption, the "de minimis" logging of old growth language in the DEIS expands what was worrisome about the Tongass exemption to the entire National Forest

System. It opens the door to a lot of old-growth trees going to the mill. There is no clarity or limiting language on what constitutes "de minimis." Logging "de minimis" old growth can be for "local community purposes" or for "research." (Standard 2c v)

Old growth can still go to the mill: As written, Standard 3 in Alt 2 would still allow for a lot of old-growth trees to go to the mill. For instance, where line officers determine that the rules about proactive stewardship aren't "relevant or beneficial" to a species or forest type under 2.c.vi, old growth trees can be logged and sent to the mill.

Carbon and climate mitigation is largely missing from the draft proposals.