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Subject: Please take stronger action to conserve and restore old-growth and mature forests -- Land Management Plan Direction for Old-Growth Forest Conditions Across the National Forest System #65356

To US Secretary of Agriculture Tom Vilsack, USFS Chief Randy Moore, and USFS Ecosystem Management Coordination Director Linda Walker:

Thank you for taking action to conserve our old-growth forests with the first ever nationwide forest plan amendment. Safeguarding and expanding carbon-rich forests on Forest Service lands is one of the most important, cost-effective, and timely approaches to fighting the climate crisis. Mature and old-growth trees and forests protect our climate by absorbing and storing carbon, boost resilience to fire, help regulate temperatures, filter drinking water, and shelter wildlife. Logging these trees deprives us of these benefits, in addition to the beauty of our largest, oldest trees. The National Old-Growth Amendment Draft Environmental Impact Statement (DEIS) is a great step forward in recognizing the values of mature and old-growth forests and in recognizing and including Indigenous tribes and knowledge into forest management policy.

"It is horrifying that we have to fight our own government to save the environment."

-- Ansel Adams

However, I am concerned the DEIS is not strong enough to make a meaningful impact in conserving old-growth forests from current threats and will ultimately fail to protect old-growth trees and forests. I therefore urge the U.S. Forest Service (USFS) to significantly strengthen its final record of decision on the national old-growth amendment to (1) ensure meaningful protections for the United States' remaining old-growth forests and (2) lay a foundation that will increase the abundance and distribution of old-growth trees for future generations.

"Our government is like a rich and foolish spendthrift who has inherited a magnificent estate in perfect order, and then has left his fields and meadows, forests and parks to be sold and plundered and wasted."

-- John Muir

Most significantly, the current draft omitted Standard 1, which was included in the previous Notice of Intent, meaning management practices that degrade old-growth quality are not explicitly prohibited. The draft 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 dubious "proactive stewardship" goals. As the USFS reduces the unnatural build-up of young trees and brush that is attributed to a century of fire suppression, it is imperative that the agency aim to create ecologically intact forests in the process and leave our oldest trees standing. This absence is a major flaw that could inadvertently promote ill-informed logging in old-growth that could destroy this unique and important ancient ecosystem. Larger, older trees are more fire resistant, and stronger protections would still allow for necessary efforts to address the risk of fire. To achieve the dual goals of making our forests more resilient to wildfire while also restoring ecologically intact forests, Standard 1 must be restored in the final amendment.

Proactive management is often needed to restore ecological conditions, particularly dry, fire-prone forests where fuel loads are unnaturally high. However, in moist forest-types where fire is relatively infrequent, proactive forest management may not be the best option to restore old-growth conditions. Rather, a passive stewardship approach where moist forests naturally grow old and restore themselves is best. I urge you to explicitly articulate in the final plan components that passive stewardship is a management option alongside proactive management.

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 rampant biodiversity loss. And they must be protected to ensure that our children are able to experience and enjoy old growth.

The Final EIS should also more clearly describe the focus on restoring forest resilience in the face of climate change. It is imperative that the final plan prioritizes the enhancement of forest resilience to climate impacts, including increased fire risk. Protecting old-growth trees is a crucial component of this effort. As legacy features, they play an irreplaceable role in maintaining the health and stability of forest ecosystems. These trees are essential for mitigating climate change effects and ensuring that forests can continue to thrive despite increasing environmental stressors.

Cutting down old-growth trees to save them from potential threats is a false solution-they are worth more standing. To successfully protect old-growth forests and trees, the final national old-growth amendment must support a modified alternative 3 that does the following:

* Eliminate exceptions and 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 where fire is infrequent.

* Remove the economic incentive for logging old growth by prohibiting the sale, exchange, and milling of old-growth trees. Even in the rare circumstances where an old-growth tree is cut (e.g., for public safety), that tree

should not be sent to the mill.

* Set the stage for durable protections for mature trees and stands, which is paramount to expanding the abundance of future old growth. To recover old growth that was lost to past mismanagement, mature forests and trees must be protected from commercial logging.

The final decision also needs to be clearer about protection of our nation's old growth crown jewel-the Tongass National Forest. The draft correctly removes an explicit Tongass exemption but includes ambiguous language that might be used to justify continued commercial logging of old growth on the Tongass.

Additionally, I urge you to heed Tribal input and consider given feedback as you finalize and implement the amendment.

Finally, the amendment needs to establish a collaborative, equitable and science-based process to identify and recruit an adequate amount of potential future old-growth in every national forest. Conservation of the remaining old-growth estate is not enough-restorative stewardship of forests on their way of becoming old-growth is needed to ensure the wellbeing of future forest health and integrity in the face of climate change.

"A thing is right when it tends to preserve the integrity, stability, and beauty of the biotic community. It is wrong when it tends otherwise."

-- Aldo Leopold

I urge you to take this opportunity to protect our oldest trees and forests. Failure to do so undermines the objectives of this amendment, contravenes the direction of EO 14072, and ignores more than half a million public comments the agency received on last summer's advance notice of proposed rulemaking. The current threats are too severe and the moment too urgent to continue with business as usual. Please take the strongest possible action to safeguard old-growth forests before it's too late.

"The ultimate test of a moral society is the kind of world that it leaves to its children."

-- Dietrich Bonhoeffer

Thank you for your consideration of my comments. Please do NOT add my name to your mailing list. I will learn about future developments on this issue from other sources.

Sincerely,

Christopher Lish

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