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Organization:

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Comments: To the USDA Forest Service and advisory committee,

As a very concerned stakeholder, I am writing to express my views on the National Old Growth Amendment (NOGA) Draft Environmental Impact Statement (DEIS) released by the U.S. Forest Service. Increasing protections for mature and old-growth forests is one of the most effective actions we can take to mitigate the impacts of climate change.

I am submitting this comment to emphasize the critical need for stronger protections for mature and old-growth forests within the National Old Growth Amendment (NOGA) Draft Environmental Impact Statement (DEIS). While the DEIS acknowledges the importance of these forests for climate resilience and biodiversity, it does not go far enough to prevent their degradation through commercial logging and other extractive practices. The adoption of a modified version of Alternative 3, which restricts all commercial timber harvest in these areas, is necessary to meet both national and international climate and biodiversity commitments.

The DEIS currently underestimates the role of mature and old-growth forests as Natural Climate Solutions, as highlighted by Law et al. (2021, 2018) and Mildrexler et al. (2023). These forests are critical for carbon sequestration and storage, with large trees being especially valuable due to their superior resistance to fire and high rates of carbon accumulation (Moris et al., 2022). The DEIS's preferred Alternative 2, which allows for logging under the guise of proactive management, fails to align with the scientific consensus that protecting these ecosystems is the highest priority for reducing greenhouse gas emissions (IPCC, 2022).

The DEIS outlines critical amendments to forest management plans intended to conserve old-growth forests across the nation, in response to the Biden administration's executive order 14072. While the proposed alternatives reflect a recognition of the ecological significance of old-growth forests, none fully prohibit commercial logging of these vital ecosystems, which is a significant oversight and undermines the goal of conserving these critical ecosystems. Effective stewardship must align with the urgency of the climate crisis, prioritizing the protection of mature and old-growth forests as key carbon sinks. Effective conservation of mature and old-growth forests requires more than discretionary stewardship; it necessitates explicit prohibitions on logging and robust protections funded and enforced by federal policy.

The DEIS should prioritize climate resilience by explicitly safeguarding these older mature forests from commercial logging and other extractive activities that disrupt and compromise their ecological integrity. It is critical that forest management aligns with the scale of the climate crisis, recognizing that these forests contribute so significantly to atmospheric carbon reduction. Allowing commercial interests to influence stewardship practices undermines the ecological goals set forth in the NOGA, Biden's EO, and global climate goals. The DEIS should be revised to include clear, enforceable standards that prioritize ecological health over economic gain.

Here, I will state that I agree with, and refer you to Coast Range Association's detailed submitted comment as well as Beverly Law's detailed submitted comment accompanied by 16 cited references; for details on Alternative 1, 2 and 4, of which are unacceptable Alternatives for many reasons, (and are individually addressed within their comments).

As stated, these forests play a crucial role in sequestering and storing large amounts of carbon and mitigating the impacts of climate change, especially those in the Pacific Northwest, and along the Pacific coast, the unique low elevation temperate rainforests, as many recent studies have revealed. It's has been repeatedly shown through various reputable scientific studies that curbing our fossil fuel extraction and use, along with simultaneously leaving all older mature and old-growth trees standing, is the ONLY way we have a chance at recovering from the extreme amounts of carbon endangering life on the planet.

Allowing more timber harvesting not only goes directly against that basic truth, but it also continues to emit tons of more carbon into our swiftly declining atmosphere, ensuring catastrophe. These facts are why so many people are finally speaking up to protect what we know to be our only hope.

The scientifically proven "importance of large trees in mature forests and old-growth as a natural climate solution" MUST be explicitly addressed in Alternative 3, to make it the only viable alternative for the Final EIS and NOGA. It should include restrictions on harvesting large trees in mature forests based on their superior resistance to fire, along with their high rates of carbon accumulation and storage, and the fact that they could become the next old-growth, and must be revered as such. These older forest giants are worth more standing, plain and simple, and no monetary argument is worth the health and lives of our children and grandchildren.

As mentioned above, and clearly agreed with by most organizations sending in comments, Alternative 3 is the only acceptable choice of action moving forward, however requires these specific changes and more revision in order to comply with the 2022 White House executive order 14072, and the current national and global climate recovery goals. The Intergovernmental Panel on climate Change states, "protecting natural- forest ecosystems is the highest priority for reducing greenhouse-gas emissions." of which, the US is a signing member and must stand by.

"The revision of Alternative 3 must be reviewed by scientists who are experts in natural climate solutions, biodiversity, and forest ecosystem carbon. Then and only then can The Alternative 3 management plans meet national and international climate and biodiversity goals."

Additionally, the DEIS lacks a clear strategy for accurately identifying and protecting mature and old-growth forests at the regional and national levels. The adaptive management strategies proposed are insufficient without a comprehensive, science-based approach to delineating these forests.

I urge the Forest Service to incorporate detailed GIS and other current mapping abilities to produce reliable transparent forest inventories to guide management decisions. (Also, engaging the public to actively take part on the ground to help document the location and health of the forests they enjoy, could be a great addition.) This would ensure that mature and old-growth areas are not only defined, but by being recognized they can then effectively be protected from actions that could degrade their status, thus allowing another loophole for harvesting them for profit.

I strongly recommend that the Forest Service revise the DEIS to include:

1.) Address the importance of mature trees in old growth stands as aforementioned and implement strong restrictions of their harvesting. Stronger hole-proof protections for mature and old-growth forests.

2.) Prohibit any form of commercial logging outright in these areas, for any reason or guise, including "salvage logging" after a forest fire.

If any mature or old-growth tree must be cut due to extreme safety reasons, it must be left on the forest floor, or moved nearby for restoration of a previously disrupted area.

3.) Through respected outside scientific and academic sources (not affiliated with the FS or timber industry), conduct and publish an in depth transparent, broad, scientifically sound study of the of various damaging effects of, and ultimately halt the practice of tree plantation monoculture. It has been proven to greatly harm forest ecology, dry out the forest floor, greatly reduce water quality and quantity, cause large scale flooding and droughts, kill much of the live soil microbiome and fungal network, release vast amounts of stored carbon in tree removal and soil disturbance, invite pests and invasive species with only a single (or very specific) species of tree allowed to grow and many dry open spaces, (increasing the need for more detrimental accumulatively toxic pesticide and herbicide use), greatly raise the stand, soil, and air temperature, and is more prone to wildfire, by creating thin evenly spaced and sized "matchbook" fuel trees, while burning hotter and spreading faster.

4.) Define and utilize a clear mapping strategy, and enhance transparency and precision in forest inventories, as well as in their published research, data, and past and present management actions.

(And) call for a moratorium on all cutting of MOG trees until said strategy is implemented and the full spectrum of natural intact MOG Forest implications and environmental values for aiding the global climate restoration revealed. Only once their live standing value is fully mapped and understood, can a permanent management plan be integrated, and these vital mature and old-growth forests properly stewarded for the residence of our future.

5.) Use the "best available scientific literature" (ie: transparent, non timber industry influenced) to guide the planning and management processes; do their DEIS Threat assessment, and to provide accurate proven data on

tree and forest mortality, forest and soil carbon sequestration and storage, forest climate resiliency, native vs plantation water ability and stand health, and old-growth wildfire resiliency and mitigation realities.

The public owns these forests, and therefore has a right to full transparent easy access of all past, present and future decisions, reasons, actions, motives, and financial incentives toward management plans. We also have a right to transparency around corporate timber industry backed campaigns, ads or education aimed at the public to appear "non-biased," in order to accrue their acceptance/support of yet more harvest through their infamous "greenwashing" or "gaslighting" propaganda campaigns that have become the well known industry standard.

The USDA Forest service, BLM, State forests, and other publicly owned land, should NEVER be influenced by the industries that stand to appease their shareholders with quick returns, or profit from, the continued loss of our community's healthy environment, health and rights. Not to mention the cultural significance and heritage uses of original indigenous lands being further disregarded by these continued destructive colonial mindsets and behaviors.

These agencies should instead be wholeheartedly safeguarding of what is left of these most critical climate balancing forests with the goals of indigenous recognition and decision making, and habitat and climate restoration. These older natural contiguous forests are humanity's best chance of creating critical wildlife and endangered species protection, ecological justice, and protections of our basic human rights by supporting clean and healthy air, water, habitat, cooler temperatures, fuller water tables, and living soil by which our very lives are supported.

By actively doing so, the Forest Service can regain its clout and uphold its commitment to ecological stewardship and contribute meaningfully to the fight against climate change, ensuring that our old-growth forested ecosystems remain resilient, and mature forests are kept standing in order to become our next old growth, under full legal and societal protection for the benefit of this and future generations.

Thank you for listening and responding appropriately to the more than one million public comments sent in on these issues over the past couple of years. The future of life on earth resides in these mature and old-growth forests, and their ability to do their most important job of naturally balancing the carbon in the atmosphere, is in your hands right now. We pray that you don't let this incredible opportunity slip through your fingers at the whim of the industrial complex. No amount of financial gain or political power is remotely worth turning our backs on the earth that supports our very existence.

Sincerely,

David Herasimtschuk