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Comments: To the USDA Forest Service, and advisory committee.

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).

Moreover, the DEIS's analysis that wildfires are the leading threat to mature and old-growth forests is contradicted by recent studies. Berner et al. (2017) and Harris et al. (2016) found that logging accounts for a far larger share of forest carbon loss compared to wildfires and insects. Logging-related emissions are five times greater than those from wildfires in regions such as Oregon, Washington, and California (Hudiburg et al., 2019). By allowing logging under the pretense of proactive stewardship, the DEIS disregards the significant carbon costs associated with timber harvests and the critical role of these forests in meeting the 30x30 conservation goals outlined in Executive Order 14072.

Additionally, the DEIS lacks a clear framework for identifying and protecting mature and old-growth forest areas, leaving these ecosystems vulnerable to degradation. The document should include specific guidelines for using Geographic Information System (GIS) and other penitent styles of mapping to precisely delineate old-growth areas and ensure transparent management practices. The absence of such detailed forest inventories and the reliance on statistical sampling methods undermine the potential for effective conservation. Implementing a science-based, spatially explicit strategy would support the recovery and expansion of old-growth characteristics across national forests, as suggested by Law et al. (2021) and the USDA Forest Service (2024).

To address these issues it, I recommend that the DEIS be revised to adopt a modified Alternative 3 that explicitly prohibits all commercial logging in mature and old-growth forests, including those that have not yet been fully inventoried or mapped. The document should incorporate the latest scientific findings on the ecological and climate benefits of protecting large trees and mature forests and ensure that these critical areas are managed to support long-term ecological integrity and climate mitigation.

Also taking into account indigenous values, cultural significance, and heritage uses of these forests and lands must be included in the amendment process, and due diligence must be used to give recognition and decision making back to them, as many of these lands were illegally taken from them, and much biodiversity and integrity already destroyed, that now needs active and diligent attention to recovery.

In conclusion, the Forest Service must prioritize the protection of mature and old-growth forests as a national and global imperative. Strengthening the DEIS to fully safeguard these ecosystems from commercial exploitation will demonstrate the United States' commitment to addressing the climate crisis and preserving biodiversity. It is

imperative that the final version of the NOGA reflects a proactive approach to conserving these irreplaceable natural resources.

I support and agree with Coast Range Association's and Beverly Law's detailed comments submitted, and point you to them for more details and their various references included.

Thank you,