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Comments: 350 Mass is a statewide climate organization dedicated to a sustainable society that cherishes the health of the planet and honors all living things. We are a grassroots organization working to end fossil fuel dependency and secure a just transition to a clean energy future. We advocate for deep systemic environmental and economic transformation through public policy, direct actions, coalitions, education, and community organizing.

As a climate organization focused on cherishing the health of the planet and honoring all living things, 350 Mass supports preserving old growth forests for many reasons. There are threats to federal forests including those posed by a changing climate, and, as the agency noted in its threat assessment, inappropriate vegetation management. Logging old growth trees to save stands from potential threats is a false solution - they are worth more standing. These trees sequester and store significant amounts of carbon. They provide essential habitat, providing homes to whole interconnected ecosystems. Offering shade, they keep the earth cooler and more moist. They help safeguard watershed integrity. They act as a bulwark against climate-change impacts like flooding and drought, and prevent soil erosion. They boost ecosystem resilience to fire. And they help regulate forests' and the earth's temperature. Logging them eliminates these benefits at the expense of forest ecosystems. They are priceless.

We are writing to convey our deep concerns with the direction of the National Old Growth Amendment Draft Environmental Impact Statement. We urge the USFS to significantly strengthen the final record of decision to ensure meaningful protections for the nation's remaining old growth, and to lay the foundation to increase the abundance and distribution of old growth for future generations by allowing mature forests to become old-growth.

* 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.

* Carbon and climate mitigation is largely missing from the draft proposals. In 2024, NO environmental impact statement should ignore the climate crisis!

* 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.

* 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.

* 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. It's out of the question to consider this possibility!

We ask that 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 moist 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.

Chief Moore, 350 Mass is counting on you to listen to the public and end the commercial exploitation of the country's oldest forests and trees. They should be left standing to store climate-heating carbon, improve watershed health, provide crucial wildlife habitat, increase forest resilience to wildfires, and act as a bulwark against climate-change impacts like flooding and drought. Old growth forests are infinitely more valuable left standing.