

To: Chief Randy Moore, U.S. Forest Service

Re: USDA Old-Growth Initiative

Date: August 2nd, 2024

Dear Chief Moore,

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. Many of the undersigned organizations will separately submit detailed comments within the comment period. But given our level of concern with the DEIS we wanted to register our perspective now.

Currently, none of the proposed alternatives are likely to result in meaningful changes in the problematic management decisions we are seeing on the ground. We regularly see mature and old-growth trees targeted for commercial logging. Given the importance of our older trees and forests in fighting the climate and biodiversity crises, the amendments must end the cutting of all old-growth trees in national forests. In the rare circumstances where old-growth trees need to be cut (e.g. for public safety purposes), it should not be sent to a mill. In moist forests, no logging of any trees should occur in old-growth stands. In dry forests that are adapted to frequent fire, targeted, ecologically appropriate restoration may be beneficial where past mismanagement, such as fire suppression and logging, has occurred, but such should never be used as an excuse to fell an old-growth tree.

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. They help safeguard watershed integrity. They boost ecosystem resilience to fire. And they help regulate forest temperature. Logging them eliminates these benefits at the expense of forest ecosystems.

But, as written, the preferred alternative includes numerous opportunities for the agency to send these essential trees to the mill. And, compounding this open-ended discretion, the agency is not required to maintain a forest's old-growth status. All alternatives explicitly allow line officers the discretion to manage old growth out of existence in pursuit of "proactive stewardship" goals. And they contain ambiguous language that could be used to justify continued commercial logging of old growth in the Tongass National Forest. The final policy must unambiguously correct these deficiencies.

The final record of decision must also establish strong monitoring and accountability measures, ensure the climate benefits of these forests are realized, and reduce the nature gap by ensuring that frontline communities and nature-deprived communities directly benefit from the policy.

The proposed policy recognizes the importance of restoring the abundance and distribution of old-growth across the country. But the policy prescriptions will not secure the significant management shifts necessary to accomplish that goal. Without clear protections aimed at recruiting old growth, the agency will fall short of EO 14072's goals. 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.

Given the outstanding role mature and old-growth trees and forests in national forests play in fighting the climate and biodiversity crises, it is vital that America establish meaningful safeguards for their conservation. The draft policy fails to achieve this. The final policy must ensure that old-growth trees stay in the forest and do not get sent to the mill. 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.

Sincerely,

MCAT