



Dear the Honorable Randy Moore, U.S. Forest Service Chief,

Thank you for requesting public input on the Forest Service's Old-Growth Initiative. In response to this request, **799 members of the public** submitted comments throughout the months of January and February 2024 via the [KS Wild website](#) calling for meaningful protections for existing old-growth forests and trees across the United States, and increased abundance and distribution of old-growth in the future.

The attached spreadsheet includes the names of the people who submitted comments, their unique comment if they submitted one, and the date and time of submission. We have not altered any of the text entered into the form.

Below is the text of the comment that people signed on to:

Dear Chief Moore,

Thank you for starting a process that we hope will end with meaningful protections for existing old-growth forests and trees across the United States, and increase abundance and distribution of old-growth in the future. We, the undersigned, are among millions of Americans who care deeply about mature and old-growth trees and forest conservation across all national forests.

The severe loss of biodiversity and the worsening impacts of climate change require solutions that match the magnitude of the threats we face. We need transformational change, not the status quo or incremental steps towards future outcomes. Done properly, this nationwide forest plan amendment could have a meaningful, near-term impact on confronting the climate crisis and on addressing the loss of biodiversity, and we look forward to seeing this potential realized.

The EIS must analyze alternatives with significantly strengthened protections of old-growth. As written, the amendment would still allow for numerous unacceptable exceptions for commercial logging of old-growth. The Forest Service should, with very limited exceptions, end felling of

old-growth trees everywhere and cutting in old-growth stands where fire is infrequent. And, in all events, the amendment language must be strengthened to completely eliminate the commercial exchange of old-growth trees. Any financial incentive to log these trees will undermine the goals of the amendment and the desired climate and conservation outcomes of EO 14072.

We also urge consideration of provisions to preclude reliance on arbitrarily restrictive definitions that artificially limit the amount of old-growth forests ultimately protected by the proposed action. The Forest Service should ensure the amendment requires definitions that are fully inclusive of all old-growth conditions, simple, and easily operationalized in the field.

And, consistent with the recognition in the notice of the importance of expanding the distribution and abundance of old-growth forests, we encourage you to consider in the EIS process alternatives for conserving the values of mature forests, including their value as future old-growth. Among other things, national forests in certain geographic areas, for example national forests east of the 100th meridian, have virtually no old-growth left due to logging which makes protecting mature forests all the more important. While there are certainly other threats to our older forests to be managed (such as wildfire), the agency-acknowledged threat of ecologically inappropriate logging remains wholly and directly under USFS's control.

The national forest plan amendment must also incorporate strong monitoring and accountability measures, both for tracking the abundance and distribution of mature and old-growth forests, and for ensuring their value as a natural carbon sink is optimized over time.

Thank you for the opportunity to provide feedback on this important effort. Given the outstanding role mature and old-growth trees and forests play in fighting the climate and biodiversity crises, it is vital that America establish the strongest possible safeguards for their conservation. We encourage the Forest Service to maintain its timeline for this amendment process, and robustly engage with Tribal Nations, the public, and other stakeholders.

Sincerely,