



February 1st, 2024

Linda Walker, Acting Director
Ecosystem Management Coordination
201 14th Street SW, Mailstop 1108
Washington, DC 20250–1124.

RE: Scoping Comments on Land Management Plan Direction for Old-Growth Forest
Conditions Across the National Forest System

Dear Ms. Walker;

Center for Sustainable Economy is pleased to provide these brief comments as you initiate the plan amendment process to protect and restore old growth forest conditions across the National Forest System. Please consider the following:

1. Given the fact that old growth forest ecosystems are extremely depleted in terms of both abundance and distribution, the Forest Service should place an immediate moratorium on logging, mining, oil and gas development, road building, infrastructure development and other activities that now threaten mature and old growth stands regardless of size. Please conduct a review of schedules of proposed actions for each national forest and identify and suspend all such projects that are currently in the planning pipeline.
2. Based on the precedent set with national forests in the Pacific Northwest, each national forest should amend its land and resource management plans to designate late successional/old growth forest reserves (LSRs) that are well distributed across all major plant community types, which reflect an abundance consistent with pre-settlement conditions, and which contain adequate amounts of existing and recruitment stands to maintain these LSRs on the landscape over time. Within LSRs, commercial activity and other human uses that involve logging or degradation of such stands should be expressly prohibited.
3. To help bolster adaptation to climate change, the LSR network established on each national forest should be connected with designated landscape linkages to provide migration corridors for species that are shifting ranges as climate change unfolds. Within these corridors, management activities should be conducted in a manner that minimizes habitat fragmentation and creation of habitat for species that compete with those dependent on late successional/old growth conditions.
4. The Forest Service should use its good neighbor authority, authority over right of way agreements, and other authorities to encourage practices on adjacent state and private

lands that are consistent with maintenance and restoration of LSRs on Forest Service lands. State and private parties should also be encouraged to provide for late successional/old growth conditions on their lands as well since these are the most productive and accessible forestlands in the nation.

5. The EIS prepared for these plan amendments should fully disclose all market and non-market uses and values that will be affected and present a benefit-cost analysis that communicates the total economic value of establishing permanent LSRs on all national forests.
6. The EIS should also include a rigorous analysis of climate benefits in terms of (a) greenhouse gas emissions avoided by prohibiting all harmful commercial uses of forestlands within designated LSRs; (b) increases in carbon storage associated with establishment and management of LSRs, and (c) benefits to climate resiliency, such as reduction in wildfire risk, increases in water quality and flow, and natural regulation of pests and disease.

Thank you for the opportunity to comment, we look forward to reviewing the draft EIS when it is released.

Sincerely,



John Talberth, Ph.D.
President and Senior Economist
Center for Sustainable Economy
1322 Washington Street Box 705
Port Townsend, WA 98368
www.sustainable-economy.org