



U.S. Department of Agriculture Forest Service  
Policy Office  
201 14th Street SW, Mailstop 1108  
Washington, DC 20250-1124

January 29, 2024

Re: Comments on the Land Management Plan Direction for Old-Growth Forest Conditions Across the National Forest System #65356

Dear Director,

Thank you for the opportunity to provide comments on the United States Forest Service's (USFS or Forest Service) Land Management Plan Direction for Old-Growth Forest Conditions Across the National Forest System #65356.

American Rivers is championing a national effort to protect and restore all rivers, from remote mountain streams to urban waterways. Healthy rivers provide people and nature with clean, abundant water and natural habitat. For 50 years, American Rivers staff, supporters, and partners have shared a common belief: life depends on rivers.

We greatly appreciate Forest Service's request for comments on amendment of all 128 national forest land management plans to include consistent direction to manage, conserve and steward old-growth forest conditions. We ask that the USFS use this opportunity to adopt protections for old growth and integrate complimentary freshwater conservation as an essential component of old growth management strategies to ensure climate resilience. The only way the Forest Service can ensure the long-term resilience of USFS lands in the face of climate change is by adopting strategies that explicitly maintaining and restore the freshwater resources on National Forests including in old growth stands. We welcome the opportunity to be a part of any collaborative process to develop management and conservation strategies to steward old growth forests envisioned by the amendment when finalized.

Healthy forested watersheds provide multiple benefits - including bolstering resilience against drought, fire, and floods - for people and the environment. Healthy forested watersheds provide source water for people, wildlife, and agriculture. They serve as natural reservoirs, enhancing drought resilience through water storage and groundwater recharge, which can sustain flows later into the summer. Additionally, well-managed watersheds and the ecological systems that encompass them improve water quality, lower water treatment costs, store carbon<sup>1</sup>, and benefit wildlife habitat and fisheries<sup>2</sup>.

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<sup>1</sup> Montane Meadows: A Soil Carbon Sink or Source? Ecosystems Nov. 2020

<sup>2</sup> Ten Strategies for Climate Resilience in the Colorado River Basin. Martin and McCoy, et. al. 2021, page 22.

Healthy watersheds have also been shown to bolster natural defenses including mitigating the impacts of wildfire and providing flood control.

Forests in the United States, covering roughly 651 million acres, also supply abundant clean drinking water for some 180 million people, more than half of all Americans and 40% of all municipalities. Healthy forests perform many of the functions of traditional water treatment facilities and water infrastructure. They store water, filter pollutants and transport clean water to downstream communities, but do it naturally and essentially for free. In addition to providing these water delivery and filtration services, riparian forests are also considered to be among the most ecologically important.

U.S. National Forests alone provide clean drinking water to over 66 million people in 3,400 communities in 33 states, National Forest system could be considered the largest and most important water provider in the nation. The U.S. Forest Service values the water that flows off of our National Forests alone at over \$7.2 billion annually.

Watersheds on National Forests historically have been impaired because of logging, mining, and unsustainable livestock grazing. Freshwater resources are being further impaired by climate change and the prolonged drought. Rising temperatures contribute to changes in timing of water availability. The size, frequency, and severity of wildfires have also increased due to warmer temperatures and drought in the West, placing our water supplies and infrastructure at risk. However, the USFS can ensure more resilient lands and waters by protecting intact and healthy watersheds and restoring those that are degraded. Forests across the country are already working to increase the pace and scale of watershed restoration, including the restoration of riverscapes and wet meadows. We recommend protection old growth forests including the streams and rivers they support as a part of the final amendment.

Thank you for the opportunity to provide input on management, conservation, and stewardship of old-growth forest conditions. We appreciate the work the Forest Service is already doing to conserve and restore critical freshwater resources across the United States.

Sincerely,

A handwritten signature in black ink, appearing to read "David Moryc". The signature is fluid and cursive, with a prominent initial "D".

David Moryc  
Senior Director  
River Protection Program  
American Rivers

