



To: Chief Randy Moore, United States Forest Service

Re: Draft Environmental Impact Statement, Land Management Plan Direction for Old-Growth Forest Conditions Across the National Forest System

Date: September 20, 2024

Great Old Broads for Wilderness is a women-led national grassroots organization that engages in and inspires activism to preserve and protect wilderness and wild lands. Our volunteer-led chapters, located in rural and urban communities across the nation, organize members to engage as advocates to protect and steward wilderness and wild places.

Great Old Broads for Wilderness supports the Forest Service's preferred alternative (Alternative 2) with the following clarifications and modifications:

1. Clarify that no commercial timber sales that occur as a result of vegetation management may include old-growth trees.

Alternative 2 would allow for commercial timber sales as a result of vegetation management in old-growth forests. Within Alternative 2, the Forest Service should clarify that only younger trees within old-growth stands may be thinned and harvested. No harvest of old-growth trees should be permitted because these are often the most fire resilient and provide the most carbon storage for climate mitigation.

We recognize that timber sales can generate revenue and ensure that the Forest Service is able to use all necessary vegetation management techniques (Alternative 3, which prohibits all commercial timber harvest, states that the removal of commercial timber harvest as a management tool could impact the ability to use other management tools, such as thinning for fire management). However, it is important that commercial timber sales are truly an afterthought to carefully planned and executed vegetation management. The possibility of a commercial timber sale should never be the driving factor for decision making in old-growth forests.

2. Reinstate Standard 1 from the Notice of Intent.

We urge the Forest Service to reinstate Standard 1 from the Notice of Intent, which established that management activities "must not degrade or impair" old-growth forests. The Draft Environmental Impact Statement (DEIS) states that Standard 1 was removed because it is too similar to Standard 2, which requires management activities within old-growth forests to be "for the purpose of proactive stewardship." However, the DEIS does not clarify that proactive stewardship may not degrade old-growth conditions. There is new language in the DEIS that

states that there is no requirement that areas of old-growth forests continue to meet the definition of old-growth when managed for the purpose of proactive stewardship.

To close these gaps in protection, the Forest Service should reinstate Standard 1 and clearly state that management activities within old-growth forests must not cause the forest to lose old-growth status.

3. Direct forest managers to identify and steward mature forests that are best suited to become old-growth forests.

Mature trees are future old-growth, and therefore need explicit management direction and protection. The DEIS does not go far enough in directing forest managers to identify and steward mature forests. The final Old-Growth Amendment should include guidelines for designating mature stands that are best suited to become old-growth.

These guidelines should include a proper representation of all forest types within each management area, with redundancy to account for future disturbance, connectivity to better absorb disturbance and ensure larger blocks of intact habitat, and address historical loss of most old-growth, which varies by region.

4. Include passive management within the definition of proactive stewardship.

The DEIS only focuses on “proactive stewardship” in old-growth forests. Many old-growth forests do not need vegetation management to maintain their ecological integrity and remain resilient to stressors. Therefore, the final amendment should include passive management (deliberately letting old-growth forests persist without intervention) within the definition of “proactive stewardship” of old-growth forests. More active forms of stewardship should focus on mature stands to advance the trajectory to old-growth conditions, especially in plantations of single species and age class.

5. Remove Standard 2b.

As written, the exceptions to old-growth conservation are too general. For example, Standard 2b allows for cutting old-growth forests when “incidental to the implementation of a management activity not otherwise prohibited.” This standard is too vague and could be interpreted in too many ways, and therefore creates a large loophole that is contrary to the purpose of the amendment and Executive Order 14072. This standard should be removed from the final amendment.

6. Modify Guideline 3 to recognize the ecological value of old trees located in younger stands.

We request modification of Guideline 3 (Table 1), which discusses the protection of old-growth trees located in younger stands. These trees are historic and interesting, but they also provide ecological value to the forests they exist in. In order to properly recognize the ecological importance of old trees located in younger stands, “To preserve the cultural and historical value

of old trees” should be changed to, “To preserve the cultural, historical and *ecological* (emphasis added) value of old trees occurring outside of old growth forests...”

7. More thoroughly incorporate the value of old-growth forests as a tool to mitigate climate change.

The DEIS views climate change as a threat to old-growth forests, but fails to fully recognize that conservation of old-growth forests is a powerful way to mitigate the impacts of climate change. Old-growth forests aren't just victims of climate change. They are an opportunity to fight climate change.

In the Ecological Services section, the DEIS recognizes that “old growth forests contribute to carbon sequestration by storing large amounts of carbon in their biomass and soil, thereby mitigating climate change.” This fact should be more thoroughly incorporated throughout the document.

8. More thoroughly incorporate the positive impact of old-growth forests on water quality and quantity.

The section on water quality and quantity states that “old-growth forests are highly retentive of nutrients. Since nutrients are retained in live vegetation, decomposing plant materials, and soils, there is less transport of nutrients in surface runoff, leading to generally higher water quality originating from old-growth forests.” We request that you add that older forests retain water and release it slowly, providing longer summer stream flows than found in younger forests.

Thank you for the opportunity to provide comments on how the Forest Service can most effectively conserve mature and old-growth forests within the National Forest System. We urge the agency to consider and implement the recommendations listed above. We look forward to working with our local forests when it is time to implement the final National Old-Growth Amendment.

Sincerely,

A handwritten signature in black ink, appearing to read 'Sara Husby', with a stylized, flowing script.

Sara Husby
Executive Director
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