



September 19, 2024

Ms. Linda Walker, Director
Ecosystem Management Coordination
U.S. Forest Service
201 14th Street SW
Washington, DC 20250

Dear Director Walker:

We first wish to express our gratitude to the U.S. Forest Service for taking steps to protect old-growth forests. America's old-growth forests are critical to the health and vitality of our public lands and cherished as recreation destinations by our community. For more than 85 years, REI Co-op has worked to inspire, educate, and outfit for a lifetime of outdoor adventure and stewardship. With more than 24 million members and over 183 locations across 43 states, these ancient forests are not only invaluable to our environment; they are an essential part of the outdoor experiences that REI members and employees cherish, and that help power the \$1.1 trillion recreation industry.

Preserving old-growth forests will ensure that future generations enjoy the same opportunities for exploration and discovery that we do today. The National Old-Growth Amendment can provide a strong foundation to promote the stewardship of U.S. forests. However, while the amendment represents a positive step, it will not adequately protect our mature and old-growth forests in its current form.

Proactive Management

We appreciate the Forest Service's prioritization of combating wildfires and improving resilience through proactive forest management. Particularly in the Western U.S., our members have been negatively impacted by wildfires that have closed beloved recreation spots. However, the amendment currently allows forest managers to do the bare minimum to preserve old-growth forests and creates loopholes that could lead to the continued or even increased logging of old-growth trees and the proliferation of plantation forests that further fuel wildfire cycles. We ask that you outline robust protections and creative incentives to address these threats and promote an approach that manages for biodiversity and the protection of our most fire-resilient trees. To that end, we encourage the Forest Service to pursue consultation with Tribal Nations and the integration of indigenous ecological knowledge in delineating its approach to proactive forest management.

Several of the plan components of the Modified Proposed Action (Alternative 2 – the preferred alternative) have substantive flaws that undermine the effectiveness of the Amendment. For example, as a whole, the DEIS's Desired Conditions¹ do not promote the expansion of old-growth trees across the National Forest System. Instead, the desired conditions merely maintain existing old-growth ecosystems.

¹ DEIS, pg. 47-48.

Further, the wording of several of the provisions in Standard 2 lack clear intent or are so broad that they provide too much discretion to line officers. For example, Standard 2.a states:

“Where conditions meet the definitions and associated criteria of old-growth forest, vegetation management may only be for the purpose of proactive stewardship.”²

This wording seems to imply that all forests that exemplify the conditions of old-growth may require proactive stewardship. However, the activities associated with proactive stewardship may not be appropriate for every forest. We ask the Forest Service to alter this standard to clarify that vegetation management should be employed *only* when it is to the benefit of the old-growth forest in question, or to make this intent clear elsewhere in the DEIS.

In addition, Standard 2.b states that the cutting or removal of trees in old-growth forests for purposes other than proactive stewardship is permitted “when ... incidental to the implementation of a management activity not otherwise prohibited by the plan...”³ In fact, the term “incidental” is used dozens of times throughout the DEIS, but is not defined. Without defining what is considered “incidental” to covered management activities, this phrasing is overly broad and fails to limit the scenarios in which tree cutting is permitted in conjunction with management activities. Standard 2.c has a similar effect, which allows tree cutting “in cases where it is determined...that the direction in this standard is not relevant or beneficial to a particular species or forest ecosystem type...”⁴ While the plan components within Alternative 3 appear to be more stringent than those in Alternative 2, many of these definitional and phrasing issues still exist.

Mature Forests

Critically, this amendment also lacks a clear framework for protecting mature trees, which are necessary for the recruitment of future old-growth forests. In Section 2.2.2 of the DEIS, the Forest Service acknowledges this fact and notes “emphasis on identifying and prioritizing areas to be managed for future old-growth forest, which includes mature forest, is included in Management Approach 1.b and Guideline 3.”⁵ Harvesting mature trees without restriction would seriously diminish the ability to preserve old-growth forests and their benefits for future generations. Without detailed guidelines and standards to protect mature trees and recruit future old-growth, the DEIS’s actions to conserve mature growth will be insufficient to ultimately do so.

Additionally, we strongly encourage the Forest Service to develop targets for conserving mature growth. By having a quantifiable metric to track how many mature growth trees are planned for old-growth recruitment, the agency will have the ability to balance that number against old-growth trees that are lost to wildfire, insects, and disease.

Monitoring Systems

We ask that the amendment require the implementation of robust monitoring systems to track the health and extent of old-growth forests. We appreciate the Forest Service’s consideration of this issue through its effort to provide monitoring direction through updates to the Forest Service Manual⁶ and the inclusion of

² DEIS, pg. 51.

³ DEIS, pg. 52.

⁴ DEIS, pg. 53.

⁵ DEIS, pg. 36.

⁶ DEIS, pg. 33.

Plan Monitoring 1 and 2 as plan components.⁷ However, we are concerned that the current wording of these components does not provide sufficient direction as to what monitoring activities should take place and the systems necessary for adequate monitoring.

Regionalized Frameworks

Finally, we are concerned that the amendment applies a one-size-fits-all approach to management that does not accommodate the diversity of our National Forests and the unique threats facing old-growth forests in different regions of the country. Although the Management Approach's requirement to develop Adaptive Strategies allows for flexibility in local planning and management, the Amendment's attempt to preserve the ability to cut old-growth trees for the purpose of wildfire mitigation essentially forces a solution to a predominantly western issue on regions where wildfire may not be as prevalent. We urge the Forest Service to promulgate a more flexible framework that allows a tailored approach to forest management and incorporates the unique features of forests across the country.

We ask the agency to refine the National Old-Growth Amendment so that future generations are able to enjoy the countless benefits that these irreplaceable forests provide. We appreciate the opportunity to provide this feedback as the Forest Service develops a final Environmental Impact Statement. If we can provide any further information or assistance, please don't hesitate to reach out.

Thank you,

Alicia Harvie

Head of Community & Government Affairs
REI Co-op

⁷ DEIS, pg. 57-58 and 73-74.