



Sept. 20, 2024

Dear President Biden, Agriculture Secretary Vilsack, U.S. Forest Service Chief Moore, and Deputy Chief French,

On behalf of WildEarth Guardians and the more than 11,400 undersigned supporters we respectfully submit these comments on the Draft Environmental Impact Statement for Amendments to Land Management Plans to Address Old-Growth Forests Across the National Forest System (“DEIS”).

Mature and old-growth trees and forests protect our climate by absorbing and storing carbon, boost resilience to fire, help regulate temperatures, filter drinking water and shelter wildlife. Logging these trees deprives us of the benefits and beauty of our largest, oldest trees.

The Draft Environmental Impact Statement fails to protect old-growth trees and forests. The proposal allows old-growth trees to be sent to the mill and allows agency staff to “manage” old-growth out of existence in pursuit of dubious “proactive stewardship” goals.

The final record of decision should:

- End the cutting of old-growth trees in all national forests and all forest types, and end the cutting of any trees in old-growth stands where fire is infrequent.
- End any commercial exchange of old-growth trees. Even in the rare circumstances where an old-growth tree is cut (e.g. public safety), that tree should not be sent to the mill.

Cutting down old-growth trees to save them from potential threats is a false solution — they are worth more standing.

The draft also fails to protect mature trees and forests. Mature forests and trees – future old growth – must be protected from the threat of commercial logging in order to recover old growth that has been lost to past mismanagement. Protection of mature forests can be accomplished in a manner that is consistent with addressing the threat of fire. They must be protected to aid in the fight against worsening climate change and rampant biodiversity loss. And they must be protected to ensure that our children are able to experience and enjoy old growth.

We urge you to take this opportunity to protect our oldest trees and forests. Failure to do so undermines the objectives of this amendment, contravenes the direction of EO 14072, and ignores

more than half a million public comments the agency received on last summer's advance notice of proposed rulemaking.

Sincerely,

A handwritten signature in black ink on a light gray rectangular background. The signature reads "Adam Rissien" in a cursive, flowing script.

Adam Rissien
ReWilding Manager