



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

I am excited to see this groundbreaking effort to steward, conserve, and recruit old-growth across the National Forest System. This comment contains suggestions to improve the final National Old-Growth Amendment.

I support the Forest Service's preferred alternative (Alternative 2) with certain clarifications and modifications. 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.

I urge the Forest Service to reinstate Standard 1 from the Notice of Intent (NOI). In the NOI, Standard 1 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, and 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.

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 should include a proper representation of all forest types within each management area, with connectivity and redundancy to account for future disturbance. By identifying mature forests and shepherding them towards old-growth conditions, we can address the historical loss of old-growth forests and create resources to combat climate change.

Thank you for the opportunity to participate in crafting the National Old-Growth Amendment. I hope to see these suggestions in the final amendment.

Sincerely,

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