



September 20, 2024

**RE: Land Management Plan Direction for Old-Growth Forest Conditions Across the National Forest System #65356**

Dear United States Forest Service:

This comment is submitted on behalf of the Ohio Environmental Council (OEC) and three hundred and sixty-six (366) signatories. These signatures and individualized comments from eighty-eight (88) of the signatories are being submitted with this filing as an Excel spreadsheet.

While we believe the U.S. Forest Service's effort to recognize old-growth forests is a step in the right direction, we also believe it falls far short of ensuring meaningful change and protection for existing old-growth forests, and for mature forests that could one day recover old-growth characteristics and status.

First, the Draft Environmental Impact Statement (DEIS) for the proposed National Old-Growth Amendment (NOGA) frames the issue of old-growth *primarily* in terms of how [USFS can and should log](#) old-growth forests to make them more "resilient." I urge the Forest Service to instead prohibit commercial logging of the old-growth forests under its care.

Second, the NOGA does not actually *require* that any acres of national forest be set aside for the recruitment and recovery of future old-growth. Very few old-growth tracts exist in the eastern United States, Ohio included. Despite the fact that old-growth forests historically dominated the landscape. It is vitally important that substantial tracts of mature forest in the National Forest System be identified and protected for old-growth recovery. I urge the Forest Service to update the NOGA to include real, measurable mandates and targets for the recruitment of future old-growth forests. We need to [bring back old-growth forests in a big way](#): For climate. For biodiversity. For outdoor recreation and the economy. To help make the connections between people and nature stronger. To make our nation stronger.

Please update the National Old-Growth Amendment to require the recruitment of substantial tracts of old-growth forests. And please prohibit commercial logging in old-growth and future old-growth in the National Forest System.

Sincerely,

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