

September 20, 2024

Thomas J. Vilsack, Secretary of Agriculture
1400 Independence Ave, SW
Washington, DC 20250

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

Secretary Vilsack,

Thank you for allowing me to submit my comments and objection concerning the “Amendments to Land Management Plans to Address Old-Growth Forests Across the National Forest System - Draft Environmental Impact Statement” (“NOGA DEIS”) dated June 2024. I object to the NOGA DEIS.

I frequently hike in mature and old-growth forest areas within the Green Mountain National Forest and have visited other similar areas in Southeastern and Western US Forest Service (USFS) lands. Protection of these areas is important to me for the benefits they provide now and for future generations of my family and humanity in general. Not to mention, the importance of mature and old-growth forests for the myriad of animals and plants that depend on their health. Mature and old-growth forests are critical for the health of native biodiversity, they reduce the risk of flooding, protect our climate by absorbing and storing more carbon than younger forests, help regulate temperatures, clean our air, filter drinking water, and support mental and physical health. There is ample recent scientific studies concerning the features and benefits of mature and old-growth forests to support concerted efforts to protect them.

There is a scant amount of mature and old-growth forests left in the United States. USFS land represents an opportunity to begin the process to recover and restore forests to their pre-colonization status. Without adequate protection of the few remaining mature and old-growth areas on USFS land, they will continue to decline. Approximately 76% of mature and old-growth forests are unprotected from logging. Logging is the greatest threat to our few remaining acres of mature and old-growth forests on USFS land, not fire, disease, or climate change.

The four Alternatives offered in the NOGA DEIS are not sufficient to protect the remaining mature and old-growth forests. The best Alternative, which was not offered in the NOGA DEIS, is to prohibit all commercial logging and prescribed fire in areas that meet mature and old-growth definitions. This will allow these areas to continue to restore in a “self-willed” way. I request that an Alternative to prohibit all commercial logging and prescribed fire in areas that meet mature and old-growth definitions be part of the final Environmental Impact Statement.

The USDA has not used the most current and best available science to arrive at the proposed Alternatives and they have not taken a hard look at the impact of the proposed Alternatives. All of this is required under NEPA guidelines. In addition, the NOGA DEIS does not comply with the most recent CEQ guidelines for NEPA. Specifically as it relates to cumulative impact analysis, carbon storage and sequestration, and impact on disadvantaged populations.

I hope that my comments and suggestions will be given serious consideration and I look forward to a response.

Sincerely,
Mark Nelson