



September 20, 2024

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

Dear Chief Moore,

Comprised of more than 250 organizations from across the nation and a variety of land, water, ocean, wildlife, sovereignty, and environmental justice missions, the [America the Beautiful for All Coalition](#) is the largest and most diverse coalition working to ensure that the national goal to conserve 30% of U.S. lands, water, and ocean by 2030 (30x30) centers communities on the frontlines of the climate and nature loss crisis.

Old-growth forests are the most effective natural solution for carbon removal, with old-growth trees serving as champions of carbon sequestration, storing it for decades or even centuries. They provide a low-cost resource that enhances our environment through cleaner air, water, wildlife habitats, and recreational opportunities. The extensive root systems of old forests efficiently absorb rainfall, prevent runoff, stabilize water tables, and retain soil moisture. These intact ecosystems support generations of wildlife, offering nesting spots in old trees and fallen logs, while also filtering rainwater, making it cleaner than that from urban or agricultural areas. In the U.S., forests supply drinking water to over 150 million people, helping communities stay resilient through droughts and changing rainfall patterns.

Protecting existing old-growth and recruiting future old-growth is a powerful tool to combat the impacts of climate change, and we strongly support the intent of E.O. 14072 and the National Old-Growth Amendment. We ask that certain aspects of the DEIS are clarified and strengthened in order to create an effective final amendment.

We are pleased to see the framework for Adaptive Strategy development which will determine how the Old-Growth Amendment will be carried out on the ground, and must be developed or adopted in consultation with Tribes and Alaska Native Corporations, as well as in collaboration with states, local governments, and other stakeholders.

The final amendment should restore Standard 1 and clearly state that management activities within old-growth forests must not cause the forest to lose old-growth status, including guidelines and requirements for designating mature stands that are best suited to become old-

growth. It should also include proper representation of all forest types within each management area, with redundancy to account for future disturbance.

The DEIS focuses on proactive stewardship but we encourage the Forest Service to explicitly include passive management, which deliberately lets old-growth forests persist without intervention, within the definition of proactive stewardship. Many old-growth forests are best stewarded by being left alone, but this is not reflected in the DEIS.

We are grateful that the agency is taking the initiative to conserve and steward old-growth forests. Thank you for the opportunity to participate in the development of this historic amendment.

Thank you,

The America The Beautiful For All Coalition