

September 20, 2024

Linda Walker  
Director, Ecosystem Management Coordination  
United States Forest Service  
201 14th Street SW, Mailstop 1108  
Washington, DC 20250

Re: Comments on Draft Environmental Impact Statement for Amendments to Land Management Plans to Address Old-Growth Forests Across the National Forest System

Dear Director Walker:

Thank you for the opportunity to offer input on the USDA Forest Service's draft EIS for the National Old Growth Amendment. We strongly support the Agency's goal, stated in the Purpose of and Need for Action, to increase the distribution and abundance of old growth. A final amendment must include management practices that advance this goal - for climate, for biodiversity, and for the long-term presence of old-growth across the National Forest System.

We offer necessary changes to the current draft proposal to ensure it can meaningfully deliver on its stated objective and the Administration's priorities. In particular, the Agency must:

- end the commercial exchange of old-growth trees;
- bar cutting of old-growth trees, subject to very limited exceptions; and
- apply the same protections to infrequent-fire old-growth stands.

For Sierra Club's complete analysis of the Draft EIS and necessary areas for improvement, we direct you to our detailed joint comments, letter ID 65356-5960-3345. We helped author these comments alongside partners including Earthjustice, the Natural Resources Defense Council, and others who have closely engaged in the effort to conserve our oldest forests for years.

As you well know, President Biden's Executive Order 14072 directed the Forest Service - and Bureau of Land Management - to conserve mature and old-growth forests across federally managed lands. This constitutes a shift in agency management practice that is practicable, necessary, and overdue. As we have repeatedly reaffirmed during this process, a final policy must create durable protections for old-growth forests to advance the intent laid out in the President's vision. Adopting the policies outlined above and in

our technical comment would advance the EO and constitute a shift in agency management practice that is practicable, necessary, and overdue.

Again, thank you for considering Sierra Club's comments and the comments of more than 750,000 Americans who have weighed in during the process to create meaningful and durable protections for our oldest forests.

Sincerely,  
Alex Craven  
Forest Campaign Manager  
Sierra Club