

Secretary Thomas J. Vilsack
U.S. Department of Agriculture
1400 Independence Ave., S.W.
Washington, DC 20250

cc: Dr. Homer Wilkes, Under Secretary for Natural Resources and Environment
Chief Randy Moore, U.S. Forest Service
Linda Walker, Acting Director of Ecosystem Management and Coordination, U.S. Forest Service

Dear Secretary Vilsack,

We the undersigned organizations write to voice our support for the U.S. Forest Service's proposal to amend all 128 land management plans across the National Forest System to create a consistent framework for the conservation and recruitment of old-growth trees. The ecological, cultural, recreational, and climate benefits produced by healthy old-growth forests cannot be overstated. However, mature and old-growth trees face an array of threats, including wildfire, invasive species, disease, and commercial logging. As representatives of the broader outdoor recreation industry, we are deeply committed to supporting the preservation of mature and old-growth forests.

Mature and old-growth forests serve as the backdrop for recreation throughout the National Forest System. Recreation in old-growth forests supports strong local economies across the country. Further, visiting these forests gives recreationists the opportunity to learn first-hand about the history of our public lands. This experience helps to foster a deep respect for nature's delicate balance and an appreciation of what is necessary to protect our National Forests. Unless a robust, place-based management regime is instituted, future generations may never experience the natural beauty of an old-growth forest. Preserving the ability of future generations to recreate in old-growth forests is extremely important to our community.

Conservation of old-growth forests necessarily requires the recruitment of future old-growth through the vigilant management and conservation of mature trees. While we understand the challenges presented by additional regulatory considerations and limited resources, we urge the Forest Service to take steps to recruit future old-growth by protecting mature growth today.

With respect to exceptions to the protections outlined in the amendment, we ask the Forest Service to provide clear information and circumstances when such exceptions are applicable. As currently written, some of the agency's proposed exceptions pose a risk of abuse due to being overly broad and open to interpretation, such as the exception for "cases where...this amendment is not relevant or beneficial to a particular forest ecosystem type." We urge the Forest Service to revise this wording and ensure that any proposed exceptions are narrow to avoid manipulative application.

We sincerely appreciate the Forest Service's acknowledgment of the importance of Tribal perspectives in the protection of old-growth forests. Recognizing tribal sovereignty through partnership with Indigenous peoples and elevation of Indigenous knowledge is essential to the proper implementation of the amendment. By taking steps to integrate Indigenous knowledge and expand collaboration between Tribal nations and the federal government, the Forest Service has the opportunity to improve its forest management practices while developing a culture of mutual respect. All actions taken to advance this partnership should demonstrate a good-faith effort to integrate

Indigenous knowledge, avoid the appropriation of Indigenous practices and culture, and respect the privacy of Tribes.

These irreplaceable forests provide clean air and water, unique recreational settings, biodiversity, wildlife habitats, carbon sequestration, cultural value, and more. Without urgent and comprehensive action, old-growth forests may be lost in the foreseeable future. We strongly support the proposed national amendment and urge that it be implemented as soon as is feasible. In doing so, we ask the Forest Service to refine and clarify exceptions to the amendment, integrate Indigenous knowledge and prioritize collaboration with tribes, place ecological welfare ahead of commercial considerations, and manage for the recruitment of old-growth through protections for mature trees.

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