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

Submitted electronically via <https://cara.fs2c.usda.gov/Public/CommentInput?Project=65356>

January 24, 2024

Please accept these comments on behalf of Wild Montana (formerly Montana Wilderness Association) and our members in response to the public comment period for the Land Management Plan Direction for Old-Growth Forest Conditions Across the National Forest System.

#### I. Organizational Background

Since 1958, Wild Montana has been uniting and mobilizing people across Montana, creating and growing a conservation movement around a shared love of wild public lands and waters.

We work at the local level, building trust, fostering collaboration, and forging agreements for protecting the wild, enhancing public land access, and helping communities thrive. Wild

Montana routinely engages in public land-use planning processes, as well as local projects such as habitat restoration and timber harvest proposals, recreational infrastructure planning, oil and gas lease sales, and land acquisitions. Wild Montana has participated in the development of every national forest plan and subsequent revisions for national forests located within the state of Montana. Wild Montana and our thousands of members and tens of thousands of supporters are invested in the ecological integrity and quiet recreation opportunities on public lands, as well as the impact of climate change on Montana's wild places.

Conserving our remaining mature and old-growth forests on federal lands is an effective, large-scale action the agencies can take to help combat climate change and protect biodiversity. We hope that the final amendment will result in proactively conserving and expanding our old-growth forests.

II. Wild Montana supports the proposal.

We appreciate the Forest Service's action to initiate a nationwide forest plan amendment that can help to provide clear, consistent direction for the management of old-growth. Maintaining

old-growth forests in functioning condition is a critical element in the fight to mitigate and minimize the global impacts of climate change and in limiting biodiversity loss.

We support eliminating commercial timber harvest in old-growth forests. Ecosystem integrity should always be the central goal for management of old-growth forests, not economic profit.

We also recognize the need for flexibility in managing for habitat, fire, insects, and disease in

order to sustain ecosystem integrity and the function of ecosystem services. In some cases, succession and the legacy effects of past management may have resulted in more mature forest cover than the natural range of variation which may not be ecologically sustainable under current climatic predictions. Adaptive management in the face of our changing climate will be important.

Equally important will be increasing mature and old-growth forest cover, in order to restore ecological integrity and mitigate the effects of climate change. Thoughtful stewardship of mature forests can help restore and expand old-growth. With very little remaining old-growth on national forest lands, allowing mature forests to develop into old-growth and expand the distribution and abundance of old-growth forests will be key to helping combat climate change and protect biodiversity. The plan amendment should incorporate strong monitoring and accountability measures to track the abundance and distribution of mature and old-growth forests.

### III. Incorporation of Tribal Knowledge

Wild Montana appreciates the inclusion of Indigenous knowledge, Tribal co-stewardship, and Tribal sovereignty in the proposed policy. We encourage you to strengthen this aspect of the policy, including recognition of Tribal treaty rights.

### IV. Necessary Additional Policies

The proposed Nationwide Forest Plan amendment represents a significant step towards conserving old-growth across our National Forests. Ensuring durable protections for mature and old-growth forests will complement the agency's other priorities, including efforts to improve

wildfire resiliency, enhance access to outdoor recreation opportunities, secure wildlife habitat, and protect clean drinking water. In addition to the proposed plan amendment, the Forest Service should consider opportunities to prioritize durability and implement regulations that will guide the management of old-growth into the future, well past future plan revisions, and other administrative changes. The agency should consider updating the Forest Service Handbook and Forest Service Manual to include updated old-growth direction.

## V. Conclusion

Thank you for the opportunity to comment on this scoping proposal. We look forward to seeing the Environmental Impact Statement analysis. Please do not hesitate to contact us if you have any questions.

Sincerely,

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ATTACHMENT: Wild Montana Comments\_Old Growth Plan.pdf is content of letter.