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Organization: REI Co-op

Title: Director of Government Affairs

Comments: February 2, 2024

Ms. Linda Walker, Acting Director

Ecosystem Management Coordination

U.S. Forest Service

201 14th Street SW

Washington, DC 20250

Ms. Walker:

REI Co-op would like to commend the Forest Service for taking steps to protect and expand our old growth forests by amending all 128 National Forest System land management plans. At REI we believe that time outside is fundamental to a life-well lived and we are committed to ensuring that transformational outdoor experiences are available to everyone. REI is an 85-year-old national specialty outdoor retailer and the nation's largest consumer co-op, with 183 retail locations across 42 states. Many of our 23 million members visit and recreate on our national forests every year and believe that the precious resources within them, particularly old growth forests, should be preserved for future generations.

Old growth forests are among the most biologically diverse ecosystems on earth and produce an array of ecological, public health, economic, and cultural benefits, including carbon storage, cleaner air and water, optimal wildlife habitat, and more. The establishment of a consistent, place-based management plan to improve old growth conditions has the potential to be a major milestone in the stewardship of public lands and climate resilience and mitigation. Additionally, it is critical that we protect not just our

remaining old growth forests, but also the mature forests that will become old growth. We encourage you to recognize the importance of protecting "future old growth forests" through this process.

Recreation on National Forest lands contributes billions of dollars to the national economy. As you know, the vitality and distribution of old growth and mature forests, which attract millions of visitors and recreationists every year, is at risk from the growing threats of wildfire, commercial logging, insects, and disease. As the ongoing vitality of our old growth forests is of critical importance to the outdoor recreation industry, we ask that the adaptive management solutions ultimately implemented by the Forest Service do not significantly hamper the ability to recreate in National Forests.

REI also recognizes that Indigenous knowledge of ecological processes, biodiversity, and the use and management of fire is essential to the health of our old growth forests. Around the world, researchers

have identified a significant correlation between traditional ecological knowledge and optimal forest conservation.[1] The Forest Service should pursue tribal co-stewardship opportunities and incorporate indigenous knowledge to the fullest extent possible.

We appreciate the interim policy of an additional layer of review of vegetation management activities by National Forest System Deputy Chief French. As the national amendment is developed and an environmental impact statement prepared, we hope that the implementation of vegetation management activities remains steady in order to properly maintain the nation's old growth forests while adequately mitigating the threat of wildfires.

In order to improve access and gather comments with a diversity of perspectives, we urge the Forest Service to consider soliciting the next round of public comments through the Federal Register.

We would greatly appreciate the opportunity to provide further input as the Forest Service continues to shape its old growth management strategy. If we can provide any further assistance, please don't hesitate to contact me at tharris@rei.com.

Thank you,

Taldi Harrison

Director, Community & Government Affairs

Recreational Equipment, Inc.

[1] Paneque-Gálvez J, Pérez-Llorente I, Luz AC, Guéze M, Mas JF, Macía MJ, Orta-Martínez M, Reyes-

García V. High overlap between traditional ecological knowledge and forest conservation found in the

Bolivian Amazon. *Ambio*. 2018 Dec;47(8):908-923. doi: 10.1007/s13280-018-1040-0. Epub 2018 Mar

12. PMID: 29532402; PMCID: PMC6230329.

ATTACHMENT: REI_Land Management Plan Old Growth #65356.pdf is letter content.