

Data Submitted (UTC 11): 2/1/2024 5:00:00 AM

First name: Sarah

Last name: Adloo

Organization: Old Growth Forest Network

Title: Executive Director

Comments: Dear Secretary of Agriculture Vilsack,

The Old-Growth Forest Network consists of thousands of people across the US who care about our

oldest forests and want them preserved. We thank you for the actions you have taken so far for our

federal old-growth forests and we are writing with comments regarding the Notice of Intent of the Forest Service's proposal to amend the 128 National Forest land management plans to better protect old-growth forests.

While the stated goals of protecting and increasing old-growth forests represent a strategy long needed for the country's forests, the proposal's provisions as they are currently stated need to be strengthened to be able to meet this goal. The provisions for vegetation management within the amendments should not undermine our ability to keep these forests intact. We encourage the EIS to analyze alternatives with strong restrictions on vegetation management in old-growth areas to allow natural forces and disturbances to be the primary source of change across these forests. In particular, the amendment language should be strengthened to never allow the logging, harvest, or commercial exchange of old-growth trees, even if economic reasons are not the primary purpose guiding vegetation management in old-growth areas. We also urge the Forest Service to remove the Tongass old-growth logging exemption from any further analysis in the upcoming EIS. Any financial incentive to log these trees will undermine the goals of the amendment and the desired climate and conservation outcomes of EO 14072.

Management of existing and future old-growth areas should not allow logging because of the negative impacts on soil, seedlings, roots, and carbon sequestration and storage of the forests as whole, in addition to impacts on individual trees. Logging cannot truly mimic natural disturbance and cannot provide the resilience, ecological, and carbon-storage benefits that are created in forests with minimal active management. Even within vegetation management practices designed to mimic disturbance in fire-adapted forest communities, large and old trees should not be removed because they are often fire-resilient with high canopies and thick bark. When older forests are logged, their immense climate benefits are lost. Within our current climate crisis, we cannot afford to be experiencing these carbon losses. Finally, vegetation management standard rationale 2(a)(xi) for "other key characteristics of ecological integrity" provides too broad of an interpretation to acceptably protect old-growth forests and exception 2(b)(v) "in cases where it is determined that the direction in this amendment is not relevant or beneficial to a particular forest ecosystem type" is also too broad and not clearly defined enough to serve as an amendment to all land management plans. We encourage the agency to very clearly define these rationales and exceptions as they are outlined in the EIS process alternatives.

The proposed Adaptive Strategy for Old-Growth Forest Conservation that identifies areas prioritized for old-growth retention and promotion is a necessary foresight for this policy. Because of the history of logging across public forest lands, the recruitment of more old-growth forests is needed and we urge the agency to create meaningful and concrete pathways that protect more mature forests from logging, which is one threat to older forests that remains wholly under the USFS's control. In particular, very little old-growth forest is left on federal lands east of the 100th meridian, which elevates the importance of protecting more areas of mature forests to a similar level outlined in the amendments. We support effective, adaptive, and robust monitoring of old-growth forest conditions to account for their abundance, distribution, carbon sequestration and storage, among other important ecosystem

services provided and urge the Agency to outline dedicated resources and capacity toward these

programs. Finally, we urge the Forest Service to maintain the timeline to the amendment process while pursuing robust opportunities for engagement with the public, Tribal Nations, and diverse stakeholders as these proposals are shaped. Thank you for the opportunity to provide input on this critical effort being developed for our national forests.

For the Forests,

Sarah Adloo, Ph.D.

Executive Director

Old-Growth Forest Network

Attachment: Jan 2024 OGFN Organizational Comment.docx (1).pdf - is the letter content above.