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First name: Matthew

Last name: Kirby

Organization: National Parks Conservation Association

Title: Senior Director, Energy and Landscape Conservation

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Director, Ecosystem Management Coordination

United States Forest Service

201 14th Street SW

Mailstop 1108

Washington, DC 20250-1124

Re: Comments on Notice of Intent for Land Management Plan Direction for Old-Growth Forest Conditions Across the National Forest System

On behalf of the National Parks Conservation Association (NPCA) and our 1.7 million members and supporters, we thank you for the opportunity to comment on the future of old-growth conditions in our country's national forests. Seventy-six units managed by the National Park Service are partially adjacent to Forest Service land. The health of our park ecosystems-and the natural and cultural resources they protect-is profoundly intertwined with the way both National Park Service units and adjacent Forest Service lands are managed. Wildlife, watersheds and recreation resources are shared across boundaries. Protecting the old-growth forests that remain provides refugia for wildlife and anchoring cores in much larger landscapes that often extend into national park boundaries.

Climate change and its related stressors are changing our national forests and national parks alike. We appreciate the proactive approach the U.S. Forest Service is taking to adapt its policies to protect, conserve and manage our national forests and grasslands to help them prepare for the climate impacts they cannot avoid. We also appreciate the Service calling attention to the important role mature and old-growth forests play in storing large amounts of carbon, preserving biodiversity, improving aquatic conditions, mitigating wildfire risks, enhancing climate resilience, serving as vital research sites, and providing outdoor recreational opportunities.

We strongly support the goal to protect old-growth forests on Forest Service land. Much as our national parks act as climate refugia and as critical anchors protecting biodiversity, water quality and cultural resources in larger ecosystems, so do stands of adjacent and nearby mature and old-growth forests. National parks alone are not enough to provide these services but rather need to work in tandem with large, interconnected landscapes. In fact, Forest Service lands harbor a far higher number of our nation's imperiled species than National Park Service lands do; therefore, these forests are vitally important for sustaining our natural heritage. The Biden Administration found last year that almost 92 million acres of mature and old-growth forests remain on Forest

Service land. Not only do these forests act as core reservoirs of carbon and biodiversity, they are also more resilient and resistant to changing climatic conditions than disturbed habitats.

As drafted, this amendment would be a historic step to protect these forests from future commercial logging. However, the EIS should include stronger protections than are currently outlined. Specifically, the Service should cease cutting old-growth trees everywhere, even cutting in old-growth stands where fire is infrequent, and especially in wet forests. Additionally, there should be no commercial exchange of old-growth trees allowed under any circumstance. We urge you to move quickly to release the proposed action and finalize a strengthened amendment.

We also appreciate that the Service recognizes the abundance of mature forest conditions that exist across National Forest lands. These ecosystems should be able to sustain old-growth forest conditions in the future. The proposed Adaptive Old-Growth Conservation and Management Strategy that individual units within the National Forest System will need to develop could, if implemented, protect mature forest stands. By placing an emphasis on management that will promote the recruitment of old-growth conditions as a key component of the Adaptive Old-Growth Conservation and Management Strategy document the Service recognizes that these mature forests have the ability to become old-growth under the right management regime. However, we remain concerned that without specific management prescriptions pertaining to mature forests that there will not be sufficient protections in place to ensure these conditions are met. For that reason, we strongly urge the Service to consider as part of this EIS alternatives for conserving mature forests and trees, including their value as future old growth.

The sheer scale and scope of these inventoried mature and old-growth forests across geographies suggest their vital importance to larger ecosystems. This plan amendment takes an extremely important step toward protecting that old growth. We look forward to continuing working with you to strengthen those protections and extend them to mature forests.

Sincerely,

Matthew Kirby

Senior Director, Energy and Landscape Conservation

ATTACHMENT: NPCA Old-Growth Comments.docx - Comments were also included in the text box; coded/completed.