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First name: Mary Jo

Last name: Brooks

Organization: National Wildlife Federation

Title: Communications Manager

Comments: Dear Secretary Vilsack,

I'm writing to share with you the 15,315 comments that members and supporters of the National Wildlife Federation sent to weigh in on the December 19, 2023 Notice of Intent to prepare an Environmental Impact Statement to amend 128 forest plans to manage older federal forests in the face of a changing climate.

Our nation's federal forests provide clean water, habitat for wildlife and cold-water fisheries, opportunities for recreation, economic activity, and are invaluable vessels for storing carbon. This is especially true of older forest ecosystems. The Notice of Intent is an important step toward the Forest Service and Bureau of Land Management adopting policies and practices to protect these forests, and pursue ecologically appropriate management to ensure that these forests continue to embody the values, and provide the amenities that they have for generations.

The growth in frequency, size, and severity of wildfire in older forests threatens their ability to continue to deliver valuable resources. Passive, custodial management of many of these forests is appropriate, but in others active management is essential to making them resilient to wildfire.

Good management can reduce the effects of wildfire while maintaining and enhancing older forest ecosystems. Increasing the ability of federal forests to respond to disturbance such as wildfire is vital to protect clean water, wildlife habitat, and absorb carbon.

Equally important is the ability to adapt to disturbance and changing conditions on the ground. The land management agencies should adopt standards to create forest conditions across the landscape that provide for wildlife habitat and migration as the climate changes and species are increasingly threatened by associated weather events.

Finally, adoption of an old forest network, as the Notice of Intent proposes, that identifies younger

forests to become part of the old forest age class would significantly contribute to adaptation and

resilience. These forests supply clean water, habitat, and absorb carbon as well, and contribute to a dynamic and vibrant forest system.

Thank you for the opportunity to comment on this important Notice of Intent. Managing our federal forests for their many uses and resources is not easy, but adopting policies focused on protecting forests and adaptation and resilience is essential if these forests are to persist into the future.

Please see the attached 15,315 comments.

Mary Jo Brooks

ATTACHMENT: Old Growth Forest Comments NWFAF 02012024.pdf - Numerous form letters including the same comments also submitted via CARA; coded/completed CARA comments.