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Comments: Please see attached letter commenting on EIS number 20240110 Project Number 65356.

September 12, 2024

The Honorable

Thomas J. Vilsack

United States Secretary of Agriculture

Department of Agriculture

1400 Independence Ave. SW

Washington, DC 20250

Mr. Randy Moore

United States Department of Agriculture Forest Service Chief

United States Forest Service

1400 Independence Ave., SW

Washington, D. C. 20250-0003

RE: Amendments to Land Management Plans to Address Old Growth Forests Across the National Forest System  
[ndash] EIS Number 20240110 Project Number 65356

Dear Secretary Vilsack and Chief Moore,

On behalf of the Conservation Committee and the National Affairs and Legislation Committee, we write in support of the preferred alternative - Modified Proposed Action Alternative 2 draft Environmental Impact Statement - for the proposed national forest old growth forest plan amendment with comments to significantly strengthen and bolster this alternative prior to it being finalized. The Garden Club of America (GCA) is a national, non-profit organization founded in 1913, comprised of 200 member garden clubs representing approximately 18,000 members across the United States. The GCA has advocated successfully for the protection of old growth forests for nearly a century. In the 1930s, the GCA raised funds from its membership to assist in purchasing over 2,500 acres of coast redwood (*Sequoia sempervirens*) old growth forest. The GCA has partnered with the Save the Redwoods League in a continuing effort to protect the Earth's largest trees. The GCA actively seeks to restore, improve, and protect the quality of the environment through programs and action in the fields of conservation, civic improvements, and education.

The GCA champions this action to protect natural systems in old growth forests on national forestlands as a vital step in protecting biodiversity and helping fight climate change. Tighter limits on logging for primarily commercial reasons in old growth forests throughout the 193-million-acre system are essential to protect old growth forests

for future generations. According to the Forest Inventory and Analysis data (FIA), wildfire exacerbated by climate change is the leading threat to mature and old growth forests. Two thirds of mature forests and over half of old growth forests are vulnerable, threatening their very existence. It is imperative that old growth forests on federal lands be protected to the highest extent that is scientifically feasible to foster the long-term resilience of old growth forests and their contributions to ecological integrity (composition, structure, function, connectivity) in the context of climate amplified stressors, across the National Forest System.

With climate impacts projected to increase, the adoption of the proposed amendment becomes even more compelling. Healthy old growth trees in National Forests return significant benefits to people everywhere, as these trees play an outsized role in absorbing carbon pollution, filtering our water, shading rivers and streams, and sustaining the biodiversity of wildlife. Magnificent stands of old growth forests are cultural icons, providing jaw-dropping recreational opportunities, and an associated economic boon for local communities. Limiting logging of our old growth stands to scientifically based standards for sustained maintenance helps reduce wildfire risk and threats to forest health and creates long-term resilience in the face of our changing climate. In addition, old growth forests within our National Forests are part of the fundamental cultural framework of Native American heritage.

Our organization supports enhanced stewardship actions through science-based management and conservation strategies to strengthen nature-based solutions to climate change in old growth forests. Knowing that our large membership across the country has deep ties to stewardship of our National Forests, we applaud the proposed new adaptive management strategies using local, geographically relevant information and the best available science, including Indigenous knowledge. We agree with the provisions that will allow regional foresters to adapt their plans to local conditions. In addition, GCA seeks forester performance measures that institutionalize climate-smart management and conservation strategies in place of measures based on board feet harvested in old growth and mature forests.

The GCA urges the further engagement of Native American people and Indigenous science in the implementation of new forest practices and efforts to sustain old growth forests within the national forest lands. Ancient trees hold specific reverence in Native American communities across our country and including tribal perspectives in the EIS plan amendment process is essential. [Idquo]These forests are sacred to Indigenous people. There[rsquo]s no way to separate Indigenous cultures from the environment and the landscapes where they evolved...[rdquo] related Angela Sondenaa, a Siletz tribal member. We applaud Agriculture Secretary Tom Vilsack[rsquo]s urgent cry stating, [Idquo]Recent scientific analysis shows us that many old-growth forests are under significant threat from climate change...The Forest Service[rsquo]s plan will help safeguard these iconic stands of trees through science-based management and conservation strategies that can be adapted to unique local circumstances on national forests.[rdquo]

Specifically, we champion the concept of providing latitude to forest managers to consider the impact on old growth forests from a wide range of perspectives, including thinning to reduce wildfire risk, prescribed fire, and minimal timber harvesting consistent with scientific standards to protect and maintain old growth stands. Likewise, we endorse the concept of [Idquo]stewardship of existing and recruitment of future old growth forest,[rdquo] meaning the added protection of mature second growth forest stands that can be managed to create old growth conditions and resiliency, as identified in the Presidential mandated 2023 inventory of old-growth and mature areas of national forests. Throughout our national forests, many mature groves are providing similar ecosystem services as old growth and are now old enough to be protected from logging as buffer zones for carbon capture, cleaning air and water, and protecting wildlife.

Knowing that old growth forests take on different characteristics in distinct ecosystems around the country and in a variety of landscapes and across many species of trees, we concur that some logging may still be appropriate for forest health. We acknowledge that the Forest Service serves multiple purposes in its management practices, including wildfire protections and pest and disease modifications.

Fundamentally, we support the preferred alternative to the draft EIS for the proposed national old growth forest plan amendment which will provide enhanced stewardship for old growth in National Forests in the Pacific Northwest, California Redwoods, Custer-Gallatin National Forest, Chattahoochee National Forest, Allegheny National Forest, as well as multiple smaller groves all across the country. This alternative must be strengthened to ensure that all national old growth forest is protected for enhancing biodiversity and fighting climate change for future generations. Magnificent ancient trees stir at the heartstrings of our members across the country and many proud Americans are passionate about the majesty of our national landscapes.

sincerely,

ATTACHMENT: Old Growth Forest Comment Letter 09122024 (2).pdf - this is the same content that is coded in text box; it was originally included as an attachment