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Comments: Director, Ecosystem Management Coordination

201 14th Street SW, Mailstop 1108

Washington, DC 20250-1124

RE: Land Management Plan Direction for Old-Growth Forest Conditions Across the National Forest System;
National Old Growth Amendment DEIS public comment

Dear Director Linda Walker,

Patagonia Works ("Patagonia") appreciates the opportunity to provide comments on the National Old Growth Amendment Draft Environmental Impact Statement and how the USDA Forest Service can protect, conserve and manage our national forests for climate resilience.

Patagonia is an outdoor-apparel company with a 50-year history of environmental activism. Protecting and preserving the environment is a core business tenet as reflected in our company's mission statement: "Patagonia is in business to save our home planet." In 2012, Patagonia became a California benefit corporation, enshrining its blended goals of business and conservation into its articles of incorporation. Patagonia believes deeply in the urgent and shared responsibility to protect the environment.

The future of Patagonia's business depends on the health of the wild places that its customers explore, which include our national forests. Outdoor recreation creates \$862 billion in consumer spending and contributes 4.5 million jobs to the U.S. economy. Land managed by the Forest Service plays a large role in supporting the recreation economy with estimates of 150 million recreational visits per year. Forest Service land contains 158,000 miles of trails and 4,300 campgrounds, all available to the public. Protecting and conserving our national forests has never been more important in the face of a changing climate, and forests are a critical climate solution for keeping carbon in the ground and out of the air.

To meet President Biden's goals for tackling the climate and biodiversity crises, it is imperative that the USDA prioritize the protection of mature and old-growth forests and trees. We need a clear and meaningful rule to ensure mature and old growth trees are protected, including from logging.

The National Old Growth Amendment ("the amendment") as proposed is a step in the right direction but it does not go far enough to protect our nation's oldest forests. Currently, none of the proposed alternatives adequately address commercial logging of old growth trees and allows loopholes and exceptions for forest managers to do the bare minimum to protect old growth. Given how critical old growth trees are for fighting the climate and biodiversity crises, any exceptions allowed for the commercial logging of these forests is unacceptable.

In the final record of decision, to fulfill the goals set out by Executive Order 14072, we would like to see a Final EIS that does the following:

- * Ends the cutting of old-growth trees in all national forests and all forest types.
- * Ends any commercial exchange of old-growth trees. No old growth tree should be sent to a mill.
- * Creates specific and strong protections for mature forests so that the mature trees of today are the old growth stands of tomorrow.

We applaud the Biden administration and the Forest Service for pursuing this rulemaking and recognizing the importance of mature and old-growth forests as a climate solution. Please take this opportunity to strengthen the National Old Growth Amendment and protect our nation's oldest trees.

ATTACHMENT: USFS NOGA DEIS Patagonia Comment 9.18.24.pdf- this is the same content that is coded in text box, it was also included as an attachment