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Title: Conservation Program Manager

Comments: See attached for a sign on letter that NCEL is circulating on behalf of the undersigned state lawmakers, the Wilderness Society, and Environment America.

September 19, 2024

US Department of Agriculture

1400 Independence Ave SW

Washington, DC 20250

Dear Secretary Vilsack:

We write to you to convey our strong support for the USDA Forest Service (USFS) to amend land management plans across the National Forest System to create a consistent approach to conserve existing old-growth forests and recruit future old-growth. We fully support the goals of protecting old-growth for the climate mitigation, species conservation, social, and cultural benefits it provides and increasing the amount of old-growth across the National Forest System (NFS). However, important changes to the Draft Environmental Impact Statement (DEIS) are necessary to ensure that the final National Old Growth Amendment (NOGA) is able to deliver the management shifts that are needed on the ground and live up to the goals set forth by President Biden's Executive Order (EO) 14072 on Strengthening the Nation's Forests, Communities, and Local Economies. In summary, the changes we request are as follows:

? The NOGA must end the logging of old-growth trees except in rare cases when required for public safety

? The NOGA must establish clear and enforceable guardrails for management that protect the limited remaining old-growth forest on the NFS from mismanagement

? The NOGA must begin to lay groundwork for a sizable portion of mature forests to be able to develop into old-growth.

One of the simplest and most cost-effective approaches to climate change mitigation and adaptation is to conserve our oldest forests as nature-based climate solutions. Mature and old-growth trees play an outsized role in carbon sequestration and storage. Moreover, they provide a host of related benefits, including world-class outdoor recreation opportunities - which supports a thriving outdoor industry in many of our districts, critical habitat for iconic and endangered species, hold deep cultural significance for many tribes, and they are connected to vital watersheds that fully half of Americans depend on for their drinking water.

Old-growth forests are also an important element in USDA's Wildfire Crisis Strategy. Older, ecologically intact forests are often more resilient to wildfire than forests with unnaturally high fuel loads comprised of younger trees resulting from a history of fire suppression. This nationwide forest plan amendment will help implement the Wildfire Crisis Strategy by way of conserving and restoring ecologically intact forests and making them more resilient to wildfire.

We see the NOGA as an opportunity to make real strides to reorient management to increase distribution and abundance of old-growth forest across the National Forest System (NFS). The final policy must advance the

vision set forth by President Biden's EO 14072 to meaningfully conserve mature and old-growth forest on federal lands. At the most fundamental level, it is important that the final NOGA must end all but truly necessary logging of old-growth trees in order to be effective. The NOGA must allow the agency to effectively address threats posed by wildfire while establishing clear and enforceable guardrails for management that protect the limited remaining old-growth forest on the NFS from mismanagement, and begin to lay groundwork for a sizable portion of mature forests to be able to develop into old-growth.

We strongly support USFS's timeline to adopt a final NOGA by January 2025. A strong public process will help inform the content of the NOGA, and support its durability well into the future. Meaningful consultation with tribes throughout the design and implementation of the NOGA is essential. We also want to ensure that our constituents' voices are heard on this important issue. Half a million people across the country engaged in a related comment period on old-growth forests last summer, and overwhelmingly supported conservation of forests.

USDA has an opportunity to secure one of the most popular and significant conservation measures in decades. Old-growth forests are of paramount importance, regardless of the ecosystem type or the legislative district where they are located. We urge you to strengthen the proposed NOGA before it is finalized to ensure that older forests are adequately conserved and that this policy is well-suited to implement the Wildfire Crisis Strategy and promote ecologically intact forests.

Sincerely,

ATTACHMENT State Legislator Sign on Letter.pdf includes 82 names/signors and legislative position