

Data Submitted (UTC 11): 9/20/2024 4:00:00 AM

First name: Sam

Last name: Evans

Organization: Bulk - Southern Environmental Law Center

Title: Leader of the National Forests and Parks Program

Comments: Linda Walker

Director of Ecosystem Management Coordination

1400 Independence Ave., S.W.

Washington, DC 20250

Submitted online via <https://cara.fs2c.usda.gov/Public//CommentInput?Project=65356>.

Dear Director Walker:

Thank you for the opportunity to comment on the proposed National Old Growth Amendments and accompanying Draft Environmental Impact Statement. As the comment period comes to a close, please accept the attached petition with over 7,200 signatures urging federal leaders to "let older forests grow" by creating additional protections for mature and old-growth forests on public lands.

As the petition demonstrates, Southerners care deeply about old-growth forests and urge the Forest Service to finalize and strengthen the proposed National Old Growth Amendments, consistent with comments previously submitted by the Southern Environmental Law Center.

Southern old-growth forests provide remarkable benefits: they filter water for downstream communities, create habitat for rare and endangered species, and are a critical tool in the fight against climate change. These centuries-old ecosystems trap and store carbon, preventing it from worsening the climate crisis.

Because of their lower wildfire risks, Southern forests are especially important in the fight against climate change. But logging of mature and old-growth forests still regularly happens in the South. For example, in North Carolina old growth is actively being logged right now on Brushy Mountain on the Nantahala National Forest. The new forest plan for the Pisgah-Nantahala National Forests in North Carolina fails to require the agency to even look for old growth when developing logging projects. These examples underscore the need for a strong national policy protecting the limited old growth left in the South and ensuring the restoration of abundant old-growth forests.

The proposal to amend forest management plans will create much-needed consistency around how old-growth forests are managed. We commend the Forest Service for engaging in this effort but urge the agency to refine the proposal recruit future old growth and close loopholes that would allow continued loss of old-growth forests to logging. Crucially, the agency's final policy should promote the protection of our healthiest mature forests so they can take the place of old growth lost to disease, wildfire, and other climate change-driven disturbances.

The Biden administration and U.S. Forest Service have an incredible opportunity to protect these critical ecosystems and preserve these exceptional places for future generations. We urge the agency to heed the thousands of voices asking the Forest Service to let our older forests grow.

The petition and list of signatures are attached to these comments.

Sincerely

Sam Evans

We know our Southern forests store vast amounts of carbon, and even more as they age. We also know that logging these trees releases much of that carbon back into the atmosphere.

That's why protecting old growth and aging forests on public lands is a key piece of the climate solution. Significant amounts of public forest remain at risk to commercial logging even though they are far more valuable as carbon storage reservoirs and biodiversity strongholds than they are on the backs of logging trucks.

Taking advantage of our forests' natural ability to store carbon, one of the most straightforward and cost-effective climate change solutions currently available to us, just makes sense. Plus, mature forests provide clean air, filter water for communities living downstream and create habitats for rare and endangered species.

It's essential that we protect old growth, as well as the mature forests and aging trees that are next in line to become old growth and are already providing immense carbon and biodiversity benefits. Do the right thing. Let older forests grow.

Attachment: SELC old growth petition.docx - this is the same content that is coded in text box; it was originally included as an attachment

Attachment: Old Growth Petition Signers 2024.xlsx includes 7,365 names/signors and contact information.