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Comments: Attached are a cover letter from Sierra Club as well as comments from 17,202 people submitted via [www.sierraclub.org](http://www.sierraclub.org). Please note that these comments are split into three documents:

- 408 comments were written completely by submitters (unique personal comments)
- 6,775 comments were an organizational petition with additional personal comments added (form plus comments)
- 10,019 comments are names signed onto an organization petition (form comments)

The fourth file is our organization cover letter.

Thank you,

Megan

September 20, 2024

Linda Walker

Director, Ecosystem Management Coordination United States Forest Service

201 14th Street SW, Mailstop 1108

Washington, DC 20250

Re: Comments on Draft Environmental Impact Statement for Amendments to Land Management Plans to Address Old-Growth Forests Across the National Forest System

Dear Director Walker:

Thank you for the opportunity to offer input on the USDA Forest Service's draft EIS for the National Old Growth Amendment. We strongly support the Agency's goal, stated in the Purpose of and Need for Action, to increase the distribution and abundance of old growth. A final amendment must include management practices that advance this goal - for climate, for biodiversity, and for the long-term presence of old-growth across the National Forest System.

We offer necessary changes to the current draft proposal to ensure it can meaningfully deliver on its stated objective and the Administration's priorities. In particular, the Agency must:

- \* end the commercial exchange of old-growth trees;
- \* bar cutting of old-growth trees, subject to very limited exceptions; and
- \* apply the same protections to infrequent-fire old-growth stands.

For Sierra Club's complete analysis of the Draft EIS and necessary areas for improvement, we direct you to our detailed joint comments, letter ID 65356-5960-3345. We helped author these comments alongside partners including Earthjustice, the Natural Resources Defense Council, and others who have closely engaged in the effort to conserve our oldest forests for years.

As you well know, President Biden's Executive Order 14072 directed the Forest Service

\* and Bureau of Land Management - to conserve mature and old-growth forests across federally managed lands. This constitutes a shift in agency management practice that is practicable, necessary, and overdue. As we have repeatedly reaffirmed during this process, a final policy must create durable protections for old-growth forests to advance the intent laid out in the President's vision. Adopting the policies outlined above and in our technical comment would advance the EO and constitute a shift in agency management practice that is practicable, necessary, and overdue.

Again, thank you for considering Sierra Club's comments and the comments of more than 750,000 Americans who have weighed in during the process to create meaningful and durable protections for our oldest forests.

Sincerely,

ATTACHMENT: Cover Letter\_ Sierra Club NOGA comments (9.20.2024).pdf - this is the same content that is coded in text box; it was originally included as an attachment

The United States Department of Agriculture (USDA), Forest Service  
Re: Land Management Plan Direction for Old-Growth Forest Conditions Across the National Forest System #65356  
Dear U.S. Forest Service,  
For far too long, profit-driven corporations have looked at our oldest forests only for the value of their timber. But the value of old-growth and mature forests is much more significant. I call on the USFS to conserve mature and old-growth

trees in federal forests to combat the climate crisis and biodiversity loss. ATTACHMENT: Sierra Club Form Comments NOGA.pdf - includes copies of the form letter text above, 10,019 names/signors and contact information

ATTACHMENT Sierra Club Form Plus Comments NOGA.pdf includes copies of the form letter text above, 6,775 names/signors and contact information as well as the following Form Plus text.

Form plus content summary:

**Biodiversity:** Old-growth forests provide critical habitats for wildlife and support a wide range of plant and animal species.

**Carbon Sequestration:** These forests play a significant role in absorbing and storing carbon dioxide, helping to mitigate climate change.

**Environmental Health:** They contribute to clean air and water, prevent soil erosion, and regulate water cycles.

**Peace and Tranquility:** Many individuals find old-growth forests to be places of peace, spiritual renewal, and natural beauty.

**Connection to Nature:** Forests offer a respite from the chaos of modern life and are seen as sacred spaces that connect people to the natural world.

**Living Museums:** Old-growth forests are considered living museums that connect people to the past and provide a sense of continuity.

**Educational and Recreational Use:** They offer opportunities for hiking, meditation, and nature appreciation, serving as important educational and recreational resources.

**Tourism and Recreation:** The preservation of old-growth forests supports local economies through tourism and recreational activities.

**Long-term Value:** Commenters argue that the long-term ecological and economic benefits of preserving these forests outweigh the short-term profits from logging.

**Stronger Protections:** There is a strong call for the USDA Forest Service to implement stronger protections for old-growth forests.

**Sustainable Management:** Commenters urge the adoption of sustainable forest management practices that prioritize conservation over exploitation.

**Deep Connections:** Many comments include personal anecdotes and emotional appeals, reflecting the deep connection individuals have with old-growth forests.

**Future Generations:** There is a strong desire to preserve these forests for future generations to experience and enjoy.

ATTACHMENT Sierra Club Unique Personal Comments NOGA.pdf includes unique comments from 408 individuals; unique/substantive comments are coded below

**Climate Crisis:** Old-growth forests are crucial for combating climate change due to their ability to sequester carbon efficiently.

**Biodiversity:** These forests provide vital habitats for thousands of species, many of which are endangered or threatened.

**Clean Water:** Forests play a significant role in maintaining clean water supplies for over half of the U.S. population.

**Recreation:** Forests support outdoor activities such as hiking, camping, and bird watching, which contribute to local economies.

**Job Creation:** Forest-related activities generate significant local spending and support thousands of jobs.

Cultural/Spiritual: Many comments highlight the personal and spiritual connection people have with old-growth forests, describing them as places of peace, beauty, and inspiration.

Stop Logging: There is a strong call to end the logging of old-growth and mature trees.

Durable Protections: Establish long-term protections to ensure that mature forests can develop into old-growth forests.

Management Practices: Shift forest management practices from treating forests as crops to recognizing their ecological and cultural value.

The comments reflect a widespread appreciation for old-growth forests and a strong desire to see them protected for future generations.