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Comments: We strongly support the U.S. Forest Service's (USFS) proposal to amend all land management plans across the National Forest System to create consistent direction to conserve existing old-growth forests and recruit future old-growth forests. Protecting older forests is part of an overarching climate-informed strategy to increase forest resilience to wildfires, combat climate-related impacts, and help retain forest carbon. However, we are concerned that USFS has weakened certain protections for old-growth forests in the Draft Environmental Impact Statement (EIS) for this amendment. We therefore urge USFS to strengthen protections in the Final EIS, including establishing that management activities must not degrade or impair existing old-growth forests and stipulating that proactive stewardship must not result in an area losing its old-growth classification. Additionally, in keeping with the stated purpose of the amendment—to increase the distribution and abundance of old-growth—we urge USFS to take concrete steps to conserve mature forests with the intention of nurturing future old-growth forests. In Executive Order 14072, President Biden unequivocally outlined the importance of mature and old-growth forests. These forests provide clean air and water, sustain the plant and animal life fundamental to combating the global climate and biodiversity crises, and hold special importance to Tribal Nations. America's forests also provide cherished recreation opportunities that revitalize our souls and connect us to history and nature, and play an irreplaceable role in reaching net-zero greenhouse gas emissions[absorbing] more than 10 percent of annual United States economy-wide greenhouse gas emissions. In light of these invaluable benefits, the President directed the Secretary of Agriculture to develop policies to institutionalize climate-smart management and conservation strategies that address threats to mature and old-growth forests on federal lands. We strongly support the intent of E.O. 14072, and we were encouraged to see the USFS Notice of Intent (NOI) proposing to amend National Forest land management plans to conserve existing old-growth and recruit future old-growth forests. However, we are concerned that certain protections have been weakened in the Draft EIS. In particular, Standard 1 in the NOI, which established that management activities must not degrade or impair old-growth forests, has been removed in the Draft EIS. USFS states that this standard was considered redundant with other standards in the proposed amendment. We disagree. The requirement that management activities not degrade or impair old-growth forests is a fundamental protection, and we urge USFS to include this standard in the Final EIS. The Draft EIS also includes new language stating, "[t]here is no requirement that [areas currently meeting the definition (and associated criteria) of old-growth forest] continue to meet the definition of old-growth when managed for the purpose of proactive stewardship." While we understand the intent of this language may be to ensure proactive stewardship is allowed to achieve intended aims, when combined with the removal of Standard 1, which explicitly prohibits the degradation or impairment of old-growth forests, this potentially creates a loophole that would allow for the destruction and loss of protections for existing old-growth forests. This is at odds with the intent of E.O. 14072 and seemingly defeats the purpose of proactive stewardship that is intended to conserve old-growth forests. We urge USFS to clarify that if management is determined to be necessary, old-growth forests must be maintained in a way that ensures the continuation of that forest's old-growth status. The USFS should make clear that any management in old-growth forests should retain the old-growth trees therein and areas meeting the definition of old-growth should not lose protections afforded by the amendment due to proactive stewardship. Language that clearly protects existing old-growth forests from degradation will be foundational for the success of this amendment. Finally, there are relatively few old-growth forests left across the contiguous United States, and much of what remains is on federal lands. Therefore, we are encouraged that the USFS has provided clear direction in the Draft EIS for the recruitment and conservation of future old-growth forests. It is important that the final amendment creates a collaborative process to conserve the oldest cohorts of mature forests with the intention of nurturing future old-growth forests. We support the inclusion of this direction in the final EIS, which would be an important step towards developing necessary protections for mature forests that both safeguard the inherent values of mature forests and serve as a source of future old-growth. Old-growth forests are an iconic and essential part of America's federal lands, but these awe-inspiring forests face a

myriad of threats from the impacts of climate change, insects, disease, and inappropriate vegetation management practices. We must therefore take proactive steps to both protect old-growth forests and recruit and conserve future old-growth forests. We strongly support the USFS's proposed land management amendment, but we urge USFS to strengthen protections in the Final EIS. In keeping with the President's E.O. 14072, we urge USFS to clarify that management activities must not degrade or impair old-growth forests and that an area cannot lose its classification as old-growth forest as a result of these management activities. Finally, we urge USFS to take concrete steps to conserve mature forests with the intention of nurturing future old-growth forests.

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