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Comments: Dear Ms. Linda Walker,

I'm writing to provide scoping comments on the Forest Service's notice of intent to prepare an environmental impact statement to analyze the development and implementation of a nationwide forest plan amendment to conserve old growth forests. Forest Service, Land Management Plan Direction for Old-Growth Forest Conditions Across the National Forest System, Notice of Intent to Prepare an Environmental Impact Statement, 88 Fed. Reg. 88,042 (Dec. 20, 2023).(EIS)

I strongly support a consistent federal policy that protects all old-growth forests and trees and significantly increases their abundance and distribution across the nation.

In evaluating options, the EIS must consider alternatives that significantly strengthen old-growth forest protections by limiting the stated exceptions to protections. For example, older forests in wet areas like the Tongass where fire is infrequent should be retained for biodiversity and climate values. In addition, existing old-growth definitions need review and ground-truthing to ensure they are consistent with best available scientific information, inclusive of all old forest conditions, and practical for consistent application in the field.

The national forest plan amendment must also incorporate strong monitoring and accountability measures, both for tracking the abundance and distribution of mature and old-growth forests, and for ensuring their value as a natural carbon solution is optimized over time.

Thank you for the opportunity to provide feedback on this historic old growth conservation proposal. I encourage the Forest Service to maintain its timeline for this amendment process, and robustly engage with Tribal Nations, the public, and other stakeholders.