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Comments: 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)

Thank you for taking this historic step toward conserving old growth on national forests across America. 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. Because of intensive logging and development, old-growth forests today occur on less than 17% of America's national forests. This deficit is particularly acute in eastern US forests. Mature and old-growth forests are a nature-based climate solution for storing large amounts of carbon, supporting biological diversity, and enhancing climate resilience. Mature forests provide many of the ecological roles as fully functional old growth forests. Over time, mature forests will recover depleted areas. The proposed amendment must set clear benchmarks for the occurrence, arrangement, and connectivity of mature and old-growth forest conditions across the landscape for ecological integrity.

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. It is vital that America establishes the strongest possible safeguards for mature and old growth forests to ensure they continue to capture and store carbon, sustain plants and animals, and provide clean air and water for life! We encourage the Forest Service to maintain its timeline for this amendment process, and robustly engage with Tribal Nations, the public, and other stakeholders.

Sincerely,

Peter Mitchell

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