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RE: Notice of intent to prepare an environmental impact statement (EIS) on Land Management Plan Direction for Old-Growth Forest Conditions across the National Forest System, 88 Fed. Reg. 88,043 (December 20, 2023).

Thank you for the opportunity to respond to the Notice of Intent (NOI) captioned above.

The Forest Service is proposing an amendment to the land management plans for every National Forest in the country that will create new standards and guidelines regarding the management and recruitment of old growth forests. This amounts to 128 plans. Public comments are due February 2.

* We are skeptical of the effectiveness and appropriateness of amending 128 Land Management Plans with a single Environmental Impact Statement (EIS) developed in less than a single calendar year. This type of policy should be accomplished through Revision or Amendment on a Plan-by-Plan basis, with robust local engagement and participation.

* The Forest Service has determined that mortality from wildfire and insect & disease are the primary threats to existing old growth forests. The final Amendment must provide clear opportunities for the agency to conduct active forest management within and adjacent to existing old growth stands to protect them from these threats.

* Forests are dynamic systems, not static. In many forest types, regeneration of old growth forests is essential to creating new healthy forests. For example, regeneration may be the only tool to address deteriorating health of certain old growth forests to enable a new, healthy forest to succeed it. The Forest Service should incorporate an exception to the proposed standards that allows regeneration of old growth for forest health objectives.

* We support the Forest Service's ambitious goal of expanding active management to reduce the threat of wildfire through its Wildfire Crisis Strategy. However, we are concerned this Amendment process will only serve as one more distraction for valuable resources that could otherwise be working to take real steps toward meeting that goal. Rather than giving our public lands managers the policy tools and support they need to sustain our forests and all the values they

provide, this policy will force them to focus limited time and resources on more process and that will do nothing to address the real risks on the ground.

- * We discourage any standards or guidelines related to the recruitment of additional old growth as most existing forest plans already contain direction for old growth recruitment. The effects of such a standard or guideline would be far too complex to effectively analyze in a single EIS across 128 National Forests.

- * The NOI provides an exception for active management in old growth forests to "reduce fuel hazards on National Forest System (NFS) land within the wildland-urban interface to protect a community or infrastructure from wildfire." We believe that hazardous fuels reduction should be a goal across the NFS, not just within WUIs, as most wildfires initiate in the backcountry. This exception should be expanded accordingly to include the entire NFS.

- * Any national forest amendment process for old growth should be razor focused on increasing science-based, active forest management to address our wildfire crisis, and to make our forests healthier and more resilient. Paperwork protection of old growth forests is not a climate solution as unmanaged western forests owned by the federal government are quickly converting into carbon emitters, according to Forest Service data.

- * Scientists at the local and international level, including the Intergovernmental Panel on Climate Change (IPCC), recognize the climate benefits of forest management, timber harvest, and wood products. Just this month in Dubai at COP28, the United States joined an international coalition committing to, by 2030, advancing policies and approaches that support low carbon construction and increase the use of wood products from sustainably managed forests to construct our homes, offices, and other buildings. Such policies and approaches will result in reduced greenhouse gas emissions, and an increase in stored carbon in forests and the built environment. In the western U.S., this can be achieved by actively managing National Forest System lands and providing sustainable wood fiber to meet these goals.

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