

Data Submitted (UTC 11): 2/2/2024 6:34:09 AM

First name: John

Last name: Tuxill

Organization:

Title:

Comments: The purpose of my letter is 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 am delighted that the Forest Service is taking steps to conserve old growth on national forests across America. I strongly support federal policy that prioritizes protection of all old-growth forests and trees, and also has a goal of increasing the abundance and distribution of mature forest (that one day can become old-growth forest) across the nation. Because of intensive logging and conversion of forest to other land uses, old-growth forests today are a scarce resource, occurring on less than 17% of America's national forests. We need more of them on the landscape, especially in lowland areas and across the entire eastern half of the US.

Mature and old-growth forests provide a wealth of benefits, first and foremost being their ability to sequester meaningful amounts of carbon (especially in the maritime Pacific Northwest), making them a nature-based climate solution. Old growth forests are also essential for conserving biological diversity and enhancing ecological resilience. We are increasingly appreciating that mature forests can provide many of these same ecological benefits, and over time mature forests can enhance the connectivity and ecological integrity of forest landscapes, including attaining all the characteristics and functions of old-growth stands. I respectfully request that the proposed amendment provide benchmarks for the occurrence, arrangement, and connectivity of mature and old-growth forest conditions at a landscape scale.

I think it is essential that the EIS consider alternatives that significantly strengthen old-growth forest protections by limiting stated exceptions to said protections. For example, older forests in high precipitation zones where fire is infrequent, such as the Tongass National Forest, should be protected 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.

I also ask that the national forest plan amendment include robust monitoring and accountability measures, which are essential for tracking the abundance and distribution of mature and old-growth forests, and for maximizing their value as a natural carbon solution.

I appreciate the opportunity to provide feedback on this old growth conservation proposal. Providing the strongest possible conservation safeguards for mature and old growth forests will ensure they continue to capture and store carbon, sustain native biodiversity (our nation's greatest natural heritage) and provide key ecosystem services that benefit all Americans. I encourage the Forest Service to maintain its timeline for this amendment process, and engage extensively with Tribal Nations, the public, and other stakeholders. Thank you.