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First name: Patrick

Last name: Holmes

Organization: American Forests

Title: Policy Consultant

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Re: Land Management Plan Direction for Old-Growth Forest Conditions Across the National Forest System, 88 Fed. Reg. Document Number: 2023-27875 (December 20, 2023)

American Forests is pleased to express our support for the U.S. Forest Services proposed nation-wide plan amendments intended to provide consistent direction to conserve, steward and recruit old-growth forest conditions and monitor these conditions across planning areas of the National Forest System. For too long, irreplaceable old growth forests have lacked a consistent and adaptable policy to support their conservation and management. The geographically informed and nimble approach posed by the Forest Service provides forest managers with a diverse suite of tools to safeguard and monitor old growth conditions and complements the agency's 10-year Wildfire Crisis Strategy, as well as President Biden's Executive Order on Strengthening the Nation's Forests, Communities, and Local Economies.

Recently, in fulfillment of requirements under Executive Order 14072, the administration released an Analysis of Threats to Mature and Old-Growth Forests on Lands Managed by the Forest Service and Bureau of Land Management. The analysis documents that wildfire, exacerbated by climate change and fire exclusion, is the leading threat to mature and old-growth forests, followed by insects and disease. The analysis further documents that tree harvest and active management since 2000 has rarely resulted in conversion to other forest conditions, representing just .03% of all inventoried acres of old growth forests.

In response to climate-driven threats, forest managers need flexible, science-based approaches to accommodate diverse management contexts, forest and local site conditions, and other management considerations. The Notice of Intent to Amend Land Management Plans marks an important first step to engage the public in developing this framework, and, alongside scientifically tailored forest restoration actions, can serve as a cornerstone of thoughtful climate-smart management approaches for the National Forest System. American Forests believes the desired conditions, standards, guidelines, and monitoring requirements presented in the scoping notice present a good foundation for initiating the envisioned plan amendments and process for guiding local and regional unit Adaptive Strategy for Old-Growth Forest Conservation. As units identify target milestones for management specific to the plan area to support progress toward the desired conditions of these amendments, it will be equally critical that they identify barriers to management implementation such as gaps in local infrastructure, contractor and partner capacity.

Thank you for the opportunity to comment on the agency's scoping of these critical proposed plan amendments. American Forests looks forward to working with the Forest Service throughout the agency's environmental analysis and decision making process.

Sincerely,

Brian Kittler

Chief Conservation Officer-Resilient Forests

American Forests

[bkittler@americanforests.org](mailto:bkittler@americanforests.org)