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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.

Please protect remaining old-growth from industrial logging, prohibit actions that degrade old-growth forests, promote actions to improve climate change resilience and reduce the risk of uncharacteristic fire activity in fire-prone forests.

Because of intensive logging and development, old-growth forests today occur on less than 17 percent of America's national forests, especially in eastern U.S. forests.

The Forest Service's proposal is a great start, but it must also provide direction for restoring old-growth forest distribution and abundance, including recruitment from mature forests. Mature forests provide many of the ecological roles as fully functional old-growth. Over time, mature forests will recover depleted areas. The proposal must also set clear benchmarks for the occurrence, arrangement, and connectivity of old-growth forest conditions across the landscape.

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.