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Comments: Ms. Linda Walker, Director

Ecosystem Management Coordination

U.S. Forest Service

201 14th Street SW

Washington, DC 20250

Dear Director Walker,

As the manager of REI #084 Fairfax Virginia and a passionate advocate for our nation's natural resources, I am writing to express my strong support for enhanced protections for old-growth trees under the National-Old Growth Amendment (NOGA). I live and work in close proximity to the [nearest national forest with old-growth trees]. These ancient forests are not only invaluable to our environment but are also an essential part of the outdoor experiences that REI members and employees cherish.

At REI, our mission is to inspire, educate, and outfit for a lifetime of outdoor adventure and stewardship. We believe that preserving our old-growth forests aligns with this mission and is essential for future generations to enjoy the same opportunities for exploration and discovery that we do today.

As you know, old-growth forests play a critical role in maintaining biodiversity, sequestering carbon, and preserving water quality. They provide habitat for rare and endangered species, some of which are found nowhere else in the world. Protecting these trees is crucial to mitigating the impacts of climate change and ensuring the resilience of our ecosystems.

I am concerned with several key aspects of the NOGA in its form. Unless major changes are implemented, the NOGA may actually result in weaker protections for mature and old-growth forests and in some cases facilitate increased logging. As written, the NOGA's exemptions for prohibitions on cutting old growth are overly broad and provide forest managers with too much discretion. The definitions set forth in the amendment also allow managers to do the bare minimum in preserving old growth.

While the NOGA acknowledges the climate crisis, it fails to accommodate how changes in climate will vary by region. While drought and wildfire are prevalent in the west, eastern forests would benefit from an increased focus on flooding due to increased precipitation. The heavy emphasis on proactive management to combat wildfire unintentionally forces a solution to what is predominantly western issue on eastern forests. To the fullest extent possible, the NOGA's guidelines should allow for a regional approach, as not all forests require proactive management to effectively conserve and recruit old-growth forests.

Finally, the NOGA lacks clear guidance on how to effectively manage and protect mature forests to facilitate the recruitment of future old-growth. This is especially concerning for eastern forests, where the volume of old-growth trees is alarmingly low. If mature forests aren't adequately conserved to allow for future old growth, the efforts to protect existing old-growth forests may prove to be in vain.

In order to address these issues, the Forest Service should make the following changes to the NOGA

Strengthen protections for old-growth trees by using more robust definitions, narrowing exemptions, and limiting scenarios that allow for tree cutting.

Develop and implement a framework for conserving mature growth trees in order to recruit future old-growth forests.

Increase resources for monitoring old-growth forests and ensure strict enforcement of protections to prevent illegal activities and ensure compliance with the amendment's directives and objectives.

Taking these steps will not only protect our old-growth forests but also demonstrate a commitment to preserving our natural heritage for future generations. REI employees and members alike are deeply invested in the health of our public lands, and we stand ready to support the U.S. Forest Service in this critical endeavor.

Thank you for your consideration and for your work on this important issue. I look forward to seeing the U.S. Forest Service take decisive action to protect our nation's old-growth forests.

Sincerely,

Kelly Keys