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Comments: Thank you for inviting me to submit comments on the June 2024 Draft Environmental Impact Statement ("DEIS") regarding Amendments to Land Management Plans to Address Old-Growth Forests Across the National Forest System ("Old-Growth Forest Amendments").

As you are aware, the Old-Growth Forest Amendments DEIS was intended to advance President Biden's 2022 Earth Day executive order to conserve and restore America's mature and old-growth forests. The Biden administration's executive order was issued because mature and old-growth forests are vital to providing clean water, absorbing carbon pollution, and supplying habitat for wildlife. This initiative is important because the federal government manages approximately 32 million acres of old-growth (18% of federally managed forest land) and 80 million acres of mature forests (45% of federally managed forest land), for a total of 112 million acres on federal land.

Unfortunately, the Old-Growth Forest Amendments DEIS falls short of the Biden administration's call to action for at least two reasons.

First, the Old-Growth Forest Amendments DEIS limits itself to the management of old-growth forests, and not mature forests, thereby failing to provide a national structure for the management of forests that have a strong likelihood of becoming the next generation of old-growth forests. This is not only contrary to the Biden administration's mandate, but it also fails to preserve and guarantee old-growth forests for generations to come. It is imperative that we emphasize the protection and preservation of tomorrow's old-growth forests-mature forests-as a tool to protect against ongoing and future impacts from climate change. Moreover, older trees are more fire resistant and stronger protections for mature trees would not materially impact the U.S. Forest Service's ability to address and plan for wildfire risk.

Second, the Old-Growth Forest Amendments DEIS does not outright ban the logging or timbering of old-growth forests. On the contrary, the U.S. Forest Service provides a multitude of loopholes through which old-growth forests will be subject to harvesting. This is antithetical to the Biden administration's edict to protect these forests and akin to sawing off the branch you're sitting on. The Old-Growth Forest Amendments DEIS should be amended to include logging or harvesting activities in old-growth forests only where it is absolutely necessary for the protection of the forests or human health and safety.

I have an interest in the Old-Growth Forest Amendments DEIS given that the SNF has approximately 100,000 acres of old-growth forest and 460,000 acres of mature forest, according to its most recent Land and Resource Management Plan. (See 2004 Superior National Forest Land and Resource Management Plan at Appendix A-23). Sadly, as noted in that 2004 Forest Management Plan, "[m]any of the stands meeting existing old growth criteria, and others that have high potential for meeting these criteria in the not too distant future, would be available for timber management activities. Therefore, the pool of stands with old growth potential could be reduced, perhaps substantially." Id.

Unless the Old-Growth Forest Amendments DEIS is broadened to include the protection of mature forests and strengthened to categorically prohibit the harvesting of such aforementioned forests except in the most necessary instances, the U.S. Forest Service will both fail the Biden administration's charge and the American people by slowly eroding existing old-growth forests and not protecting the next generations' old-growth forests.