



Dear Secretary of Agriculture Vilsack,

Right now the Forest Service is considering tens of thousands of comments regarding its draft nationwide proposal to amend all 128 land management plans (i.e. Forest Plans) that is meant to ensure the future of old growth forests across the country. In its initial announcement, the Forest Service explained that its “intent is to foster the long-term resilience of old growth forest conditions and their contributions to ecological integrity across the National Forest System.” 88 FR 88042. But as many comments explained, the agency’s draft proposal falls far short. I am writing today urging that the Forest Service does better and revise its draft proposal so any final amendment will truly protect existing old growth forests and ensure mature forests can develop into these unique ecosystems.

To that end, we lay out below key amendment components that we urge the Forest Service to consider and adopt in the upcoming Draft Environmental Impact Statement. And, to ensure the final amendment makes durable progress, we urge that the amendment make clear that the authority to revise, amend, and modify the amendment—including the Standards for Management—resides exclusively with the Secretary of Agriculture. This will prevent local agency officials from changing the amendment through specific project decisions, which often occurs.

### 1. Stop the Commercial Exploitation of Old Growth Ecosystems

The Forest Service must consider and adopt standards and other plan components that effectively end the sale and commercial exchange (e.g., stewardship goods for services contracts) of all old-growth trees. Deleting “primary” from Section 3 of the Standards in the initial draft amendment is an important change to make but not sufficient; even if commercial use is not a purpose of a project, if permitted, it can still distort agency decisions. No old-growth trees should be sent to a mill, including via pre- or post-disturbance salvage logging.

There is no ecological justification for sending old-growth trees to a mill. Section 3 would allow commercial exchange of old-growth trees to continue if economic reasons are not the “primary purpose” of a project. The agency rarely advances projects where economic reasons are a primary purpose, instead pointing to other goals (e.g., resilience or restoration). Internal performance metrics (e.g., timber volume KPIs) incentivize the sale of old-growth trees and distort agency decision making, even when a project’s primary purpose is non-economic. And sending such carbon-rich trees to the mill will result in disproportionately high releases of carbon into the atmosphere.

## 2. Ensure Mature Trees Develop into Old Growth Ecosystems

The Forest Service must consider and adopt an alternative with protections for mature trees and forests, including protective standards that immediately ensure retaining a significant portion of the standing carbon across each national forest. Such a measure would effectively curtail the commercial exchange of mature trees so they may develop into old growth ecosystems. To make this possible, the Forest Service must recognize the value of older, mature trees and stratify mature age classes to provide protection for those older trees. Further, the agency must set clear objectives for how many acres of old growth ecosystems will be achieved over the life of the Forest plan, based on the upper bound of natural range of variability for each forest type within each national forest.

President Biden's E.O. 14072 elevates the climate importance of mature trees and forests, and directs the agency to adopt policies to conserve them. While the Forest Service acknowledges the Nation's severe deficit of old growth, it includes no standards to protect the mature trees and forests that will become old growth. Further, the old growth definitions are overly narrow and leave out significant amounts of old growth. Extending protections to a meaningful subset of mature trees would help address these limited definitions.

## 3. Acknowledge the Immediate Need for Old-Growth Ecosystems

The Forest Service must consider and adopt an alternative with a "Purpose & Need" that clearly states expanding the abundance and distribution of old growth ecosystems across the entire forest is a near-term desired condition, and that recognizes the need to immediately halt inappropriate vegetation management given that it is a threat to existing and future old growth.

Adding a temporal provision concerning near-term recruitment would eliminate uncertainty about the timeframe for expanding old growth. The proposed draft amendment fails to include clear guidance or objectives that will ensure protecting existing old growth ecosystems across the entire forest, and instead includes weasel language that directs agency officials to prioritize old growth recruitment on just one "landscape" that it fails to define. Given all the climate crisis factors that the agency cannot control (drought, temperature, high-winds, etc.), inappropriate vegetation management is a threat the Forest Service can actually address.

## 4. Eliminate the Tongass exemption

The Forest Service must consider and adopt an alternative that eliminates Section 4 of the draft plan's standards, which allows for old-growth logging under the Southeast Alaska Sustainability Strategy (SASS).

The SASS can be changed without any public process, thus exposing one of the world's largest expanses of mature and old growth forests, the Tongass, to the risk of increased logging. The time for logging old growth has long passed, especially in such a vital area of the globe.

Sincerely,  
WildEarth Guardians