

January 27, 2024

**Re: Land Management Plan Direction for Old Growth Conditions across the National Forest System #65356.**

Thank you for the opportunity to comment on the Notice of Intent for planning direction for old growth conditions on national forest system lands.

The National Association of Forest Service Retirees (NAFSR) represents Forest Service (FS) retirees with considerable experience across every state who have cared for the nation's forests and grasslands. Our members span the entire spectrum of natural resource professionals and researchers. We stay strongly connected to the health of the national forests, the communities they serve, and the capacity of the FS to meet their responsibilities.

By and large, NAFSR supports the approach the FS is proposing, that is the development of one, system-wide Environmental Impact Statement to support a national plan amendment that address old growth conditions across the agency's jurisdiction. It certainly has a better feel to us than a one size fits all rulemaking. With that said, we do want to flag a few areas where we have questions and some concerns about the proposed path forward.

1. It seems reasonable that recent forest plan revisions would require little, if any change since they likely incorporate sufficient direction for old growth conditions, given their recent development. It would be helpful to understand how the agency plans to incorporate the more recent plan revisions into the national EIS in a manner that does not inhibit field units already making use of them.
2. NAFSR supports continued implementation of vegetation management as outlined in the Forest Service's Wildfire Crisis Strategy. It would be helpful to understand how the agency plans to ensure timely review of projects involving old growth that are tied to successful implementation of this sound strategy.
3. NAFSR would favor the EIS being done as timely and efficiently as practical, given the realities of a NEPA process at such scale. We are sure you agree that agency field personnel have many pressing and important issues on their plates, including trying to keep the forest plan revision schedules on track. An eye should be kept to minimizing disruption and maximizing available funding at the field level.
4. We all learned the importance and value of working closely with various stakeholders during our careers. It would be helpful for us to understand the agency's strategy for incorporating local voices, including collaborative groups, cooperative agencies, and Tribal interests into the national EIS effort.

NAFSR appreciates the dialogue we have had with Forest Service leadership on this and many other issues. We look forward to continued conversation and involvement and remain available to provide advice and assistance in addressing this, and other matters confronting the agency.

Sincerely,

*Steve Ellis*

Steve Ellis, Chair  
National Association of Forest Service Retirees (NAFSR)