



## Native Plant Society of New Mexico

P. O. Box 35388  
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September 14, 2024

Director Linda Walker, Ecosystem Management Coordination  
201 14<sup>th</sup> Street SW, Mailstop 1108  
Washington, DC 20250-1124

Dear Director Walker:

Old-growth forests in National Forest lands harbor unique biodiversity, contribute to water quality, and store carbon. They are under great threat from climate change, insects and disease, fire, and commercial and recreational activities. The Native Plant Society of New Mexico supports amending Land Management Plans (LMPs) to “institutionalize climate-smart management and conservation strategies that address threats to mature and old-growth forests on Federal Lands” ([DRAFT EIS - Amendments to LMPs to Address Old-Growth Forests across the NFS](#)).

The New Mexico Native Plant Society has over 840 members. We strive to educate the public about native plants by promoting knowledge of plant identification, ecology, and uses; foster plant conservation and the preservation of natural habitats; support botanical research; and encourage the appropriate use of native plants to conserve water, land, and wildlife.

The four alternatives discussed in the Draft EIS all emphasize proactive stewardship in old growth forests. Alternative 2, favored by the Forest Service, does allow some commercial logging in order to achieve stewardship goals. Because many old-growth and mature forests would benefit from thinning to reduce losses to fire, pests and diseases, Alternative 2 does seem to be a practical choice. Thinning and prescribed burns have been shown to protect and enhance resilience of several mature and old-growth forest types to insects and disease and to wildfires in the Southwestern region.

The Native Plant Society of New Mexico supports Alternative 2, but encourages the Forest Service to be extremely cautious in granting commercial timber harvesting permits without proper oversight and direction. In the southwestern region there are many different types of old growth forests, each of which require individual consideration of best management approaches. The amendment of LMPs for different National Forests will help address this, but even individual National Forests could have several types of old growth ecosystems. Commercial logging should probably never occur in old growth forests, but could foreseeably be used in mature forests in order to move them towards healthy old-growth forest.

We feel that these actions will improve the conservation and resilience of the old-growth forests in the United States.

Sincerely,

A handwritten signature in cursive script, appearing to read 'Sylvan Kaufman'.

Dr. Sylvan Kaufman  
Conservation Chair  
Native Plant Society of New Mexico