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Comments: Please see my attached comments.

Thank you

Dear Forest Service and Chief Moore,

Thank you for accepting this scoping comment for the Forest Service's Land Management Plan Direction for Old-Growth Forest Conditions Across the National Forest System.

The USFS needs to strengthen and protect, once and for all, the last remaining old-growth forests on USFS land in the United States. Most credible estimates are that we only have 3% of old-growth forests remaining, and that tiny, miniscule amount of incredibly important and biodiverse forests needs full protection. There should not be any logging of any kind, with no exceptions, in old-growth forests any longer. We need old-growth for climate, wildlife habitat, and drinking water.

The USFS forests are vital to our country, providing cold, clean water for people and wildlife, inspiring places for contemplation and recreation, older forests home to rare species, climate change mitigation, and job opportunities.

It is crucial that we ensure that these ecosystem services continue to flow from our national forests and that they are able to adapt to a changing climate.

In order to protect old-growth forests into the future you must also protect all remaining mature forests as well, in order to recruit old-growth forests into the future. Trees don't live forever, and in order to have old-growth in another couple hundred years, we need to protect mature forests now so that they can grow into old-growth forests.

The USFS needs to recognize and take into account the critical role old-growth and mature forests on public lands play in providing clean water, mitigating climate change, and protecting biodiversity. The Northwest Forest Plan was enacted to halt and reverse the devastation caused by past logging and road-building. These practices drove the extinction of old growth-dependent wildlife like northern spotted owls and marbled murrelets, polluted water, and destroyed ecosystem function. In light of the climate and extinction crises, the plan must be expanded to protect our last remaining mature and old-growth forests and the benefits they give all of us.

* Ensure consistency with President Biden's 2022 Executive Orders on forest protection and climate resilience, which recognize the critical role national forests play in halting the climate and biodiversity crises.

* Preserve biodiversity and improve connectivity of wildlife habitat. This habitat includes not only threatened and endangered species, but all species that have been harmed by the loss and fragmentation of habitat. Reserve networks for habitat connectivity need to be set aside and protected for the survival of biodiversity into the future.

* Protect and expand the reserve network on USFS land. It has been successful until now because it moved many older forests into "reserves" that limited commercial logging. It's imperative that these reserves continue to be protected from attacks by the timber industry. The reserve network should include connectivity reserves, as well as reserves specifically for biodiversity, connectivity and wildlife habitat. There should be NO EXCEPTIONS for logging in reserves.

* Increase Special Interest Area protections and designate new Special Interest Areas for cultural, ecological, and historical significance, including the protection of mature and old-growth forests.

- * Create carbon reserves for carbon storage in general, with no age class of trees as a target. The trees can grow and hold carbon into the future.
- * Protect complex, early seral forests from logging. The condition of present and future fire-affected forests is degraded by salvage logging after fires. This activity destroys the soil and important wildlife habitat, pollutes water, and erodes natural forest regeneration processes. Post fire logging also massively degrades pollinator habitat. I've seen over and over a huge super bloom of wildflowers triggered from high severity fire, that is critical for pollinators of all kind, and then the USFS will go in and salvage log the forest and drag logs all over the wildflowers and destroy the best blooms that pollinators have had, in sometimes 100 years in some places. Pollinators need fire for big post-fire blooms, and salvage logging destroys critical pollinator habitat. Protecting mature and old-growth forests, also means protecting everything that lives in those forests, including wildflowers and understories that are habitat for pollinators. Pollinator protection must be a focus of old-growth protection, especially in the post-fire environment.
- * Deemphasize timber production. Any changes must set new timber targets that recognize communities' decreased reliance on forest exploitation and more appropriately limit the amount of commercial logging that occurs on public lands. Mature and old-growth trees are worth more standing than logged. Recreation is worth way more economically to communities in the US than logging. Logging towns are depressed, poor communities. Towns that rely on recreation of protected lands are vibrant and thriving. I say this as a rural person that has lived on the edge of the National Forest for 25 years in a remote location. Recreation and protected lands and forests are worth way more economically to my local, rural community than logging.
- * Expand and strengthen the Aquatic Conservation Strategy. This has been one of the most successful components for protecting mature and old forests in riparian areas, but as climate change and the freshwater extinction crisis worsen, expanded riparian buffers and additional key watershed designations are necessary to protect salmon runs and water quality.
- * Expand and strengthen the Botanical Area network. Botanical Areas are critically important to preserve biodiversity. Many well deserving areas with high biodiversity were left out of the original Botanical Area network, and many more areas should be included in the Botanical Area network, including areas with rare conifer species, or species at the edge of their range. Botanical Areas should be treated like reserves and truly protected from damaging land management actions, especially bulldozers during wildfire, which can wipe out whole populations of rare plants in one afternoon. Grazing allotments should exclude Botanical Areas to protect high value species from cattle grazing that reduces their flowering and ability to set seed and expand or maintain their populations. Grazing permittees should be given rules to keep their cows out of botanical areas through herding, fencing, or virtual fencing. Rare conifers need protection. The Klamath-Siskiyou region of northwest California and southwest Oregon has many species of rare conifers that grow nowhere else on earth, and the mature and old-growth forests of these rare species can be protected in reserves as part of the Botanical Area network.
- * Old-growth forests are threatened by roads and habitat fragmentation from roads. Strengthen the guidance and goals for road closures and obliteration through regrading and putting more roads to bed. This will help improve watersheds, water quality, habitat connectivity, and it will create more fire resiliency since more human caused fires are started along roads. The more roads you have the more opportunity for fire starts during high winds and high temperatures. The USFS has a massive backlog of road maintenance, and improving the road obliteration program and increasing the number of miles obliterated will only be helpful in the long run both ecologically and economically. There are way too many roads in the USFS road system.
- * Conservation of the northern spotted owl, marbled murrelet, and native salmonids was a cornerstone of the 1994 NFP, and an amendment should only maintain and enhance protections for at-risk fish and wildlife. The Northwest Forest Plan amendment should bolster efforts to recover wildlife, recognizing the ongoing threat of climate change and past management practices. To protect biodiversity in the era of climate change, the amendment must ensure habitat resilience from disturbances such as wildfire, drought, disease, and insects.
- * The USFS must provide strong monitoring and accountability measures, both for tracking the abundance and distribution of mature and old-growth forests, and for ensuring their value as a natural carbon sink is optimized over time.

The future citizens of the United States are counting on the USFS to act now to protect the land, forests for future

generations. Protecting mature and old-growth forests is critical to the health of ecosystems and communities. I urge you to ensure that any proposals at least maintain existing ecosystem-based conservation goals, but I'm counting on you to go further to strengthen these provisions.

The severe loss of biodiversity and the worsening impacts of climate change require solutions that match the magnitude of the threats we face. We need transformational change, not the status quo or incremental steps towards future outcomes. Done properly, this nationwide Land Management Plan Direction for Old-Growth Forest Conditions Across the National Forest System could have a meaningful, near-term impact on confronting the climate crisis and on addressing the loss of biodiversity, and we look forward to seeing this potential realized.

Thank you for this opportunity to provide comments on this important Forest Service direction.

ATTACHMENT: Mature and old-growth forest protection comment_Suzie Savoie.docx is letter content.