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Comments: As a citizen of the public for whom you work I am invested in wise stewardship of standing mature and Old Growth forests in which I live in coastal Oregon on both National Forest Public land and privately owned standing forests. Informed, wise stewardship is very distinct from your notion of "management" where the hubris of human beings believes they are needed in order for forest ecosystems to thrive. We are NOT needed to meddle, damage, compact the forest floor, release enormous amounts of carbon, and often introduce invasives on heavy equipment used to log - oh, pardon me, "aggressively thin" trees with a recipe that only benefits your budget. Mature conifer natural forests have thrived and become Old Growth without interventions of humans for millenia. It's no secret that the urge you people seem to love so dearly is to kill the forests by clear cuttting and is a far bigger "risk" than fire to these mature >80 yr old stands and remaining Old Growth that is still standing.

I recommend you read all the messages in these 50+ pages of testimony. There are clear and appropriate recommendations from Professors emeritus Jerry Franklin and Norm Johnson calling out a significant need for inservice education for your employees who may know how to do industrial clear cutting and 'chemical management' but haven't the skills or knowledge about how to read clearly which forests need ladder fuels removed and which do not. Pay attention to their 'corrections' and honor their truth speaking as your elders with much life wisdom. Professor Emerita Beverly Law's researched based recommendations are attached below and worthy of your attention and willingness to 'change your mind' as she too speaks important truths to you - you'd be wiser for adopting her teachings and our forests better stewarded and thriving.

John Talberth and CHuck Willer and many others have a wealth of knowledge on which to draw and there are many of us who have been in our national forest lands his summer/fall and have photos, measurements of dominant trees, reports of diversity of understory and of conifers and deciduous native nitrogen fixing trees. We vote for respecting the closed canopy that enables a cooler moister forest, robust stream flows, safety from fire, pestilence, invasives, and the right habitat needed by those who live in and fill niches in the ecosystem. These are WORKING FORESTS providing essential services valuable beyond 'board feet' and a free mitigation to the rising carbon emissions made by unmindful humans. If we want to continue to live safely on this planet it is these massive carbon sequestering forests that work at no charge to reduce green house gasses, provide oxygen, hold moisture and keep streams in watersheds flowing.

WATERSHEDS that provide source drinking water for municipal and smaller domestic water systems must be protected from the long-term harms of clear cutting or even aggressive thinning and use of toxic chemicals without exception. DO IT NOW in the name of adequate clean clear cold drinking water for all the living beings who require water for life. There is no "do over" on this - even at 50 years post harvest, stream flows have 50% less water available for stream health and for use by wildlife and humans. This is unacceptable with our changing climate with increased heat, stream failures that have reliably provided drinking water for decades, and in-flows of increasing populations due to necessary migrations.

Read Jim Fernish's book and learn from him the wisdom of adaptation of beliefs in the face of incontrovertible

evidence and then have courage to change policy. And for Earth's sake demand full funding from congress instead of pillaging living forests and ecosystems to meet payroll or pay the electric bill. We need all the STANDING FORESTS we have!

Comments on DRAFT EIS: Land Management Plan Direction for Old-Growth Forest Conditions Across the National Forest System (65356)The Forest Service is proposing to amend all land management plans for the 128 planning units of the National Forest System to include consistent direction to conserve and steward existing and recruit future old-growth forest conditions and to monitor their condition, in order to foster the long-term resilience of old-growth forest conditions and their contributions to ecological integrity across the National Forest System.I support the Forest Service[rsquo]s stated intent to prioritize conservation and stewardship of mature and old-growth forests (MOG), as directed by President Biden[rsquo]s EO 14072 [ldquo]Strengthening the Nations Forests, Communities, and Local Economies[rdquo] (Whitehouse 2022).Summary: The DEIS lacks reference to and incorporation of knowledge from the current scientific literature to guide the planning process and management actions. The team should redo their Threat Assessment, as it provides a questionable baseline for deciding how to manage mature and old-growth forests. To meet the 30x30 goal, the priorities for protection should be based on forest carbon for climate mitigation, biodiversity, and landscape integrity (Law et al. 2021, 2018; Mildrexler et al. 2023, 2020).I disagree with the selection of the [ldquo]preferred[rdquo] Alternative 2. Mature forests are not sufficiently included with old-growth in the Alternatives. Alternative 3 comes closer, but it is essential to modify it in order for it to be acceptable. Alternative 3[rsquo]s goals, objectives and tasks must address the importance of large trees, mature forests and old-growth as Natural Climate Solutions (Law et al. 2023, 2021, 2018). It should include restrictions on harvesting large trees in mature forests that could become old growth, based on their superior resistance to fire in most forest ecosystems (Moris et al. 2022) and their significant contribution to carbon stocks and high rates of carbon accumulation. The revision of Alternative 3 must be reviewed by scientists who are experts in Natural Climate Solutions, biodiversity, and forest ecosystem carbon. Then and only then can the Alternative 3 management plans meet national and international climate and biodiversity goals (IPBES-IPCC 2020, IPCC AR6 WGII, 2022).Detailed Comments:1. Page S-4, para. 4 [ldquo]The analysis found that mortality from wildfires is currently the leading threat to mature and old-growth forests, followed by insects and disease. The analysis also found that tree cutting is now a relatively minor threat compared to climate amplified disturbances such as wildfire, insects, disease.[rdquo]Comment: This demonstrates the FS is not using best available scientific literature to guide the planning process. The analysis is completely wrong compared with the scientific literature that also used FIA data. Across the W US, aboveground biomass carbon mortality was primarily due to logging (50%), followed by insects (32%), and wildfire (18%) (Berner et al. 2017). Another study indicated that 66% of the aboveground biomass mortality was due to logging (Harris et al. 2016). They found that harvest accounted for 99% of mortality in the southern US, and 44% in the northern US. In terms of emissions, we found that annual logging-related emissions were 5times that of wildfire emissions in Oregon, Washington and California combined (Hudiburg et al. 2019), and that 100 years of wood product usage is reducing the potential annual carbon sink by an average of 21%. Logging is the major impact on mature and old forests. Moreover, increasing demand for wood products (e.g. mass buildings, bioenergy) is expected to accelerate net emissions from logging, wood processing, and operational use (Moomaw & Law 2023, Peng et al. 2023, USDA 2023).2. Page S-6. [ldquo]The need for change is to: Demonstrate compliance with Executive Order 14072 to institutionalize climate-smart management and conservation strategies that address threats to mature and old-growth forests on Federal lands.[rdquo]3. Page S-7. [ldquo]What would be the impacts from Standard 3 in the modified proposed action that restricts proactive stewardship in old-growth forests for the purpose of timber production.[rdquo]Comment: It appears that the FS took a large portion of forests off the table in the Threat Analysis because harvesting remains the priority for the agency. This will not likely meet the 30 x 30 requirements of the EO. The priority should be to identify and protect the forests that are the most ecologically important for conservation and connectivity to reach the EO 30 x 30 goal, and not start with taking a huge amount of forestland off the table before such forests are identified. Forests play an important role in Natural Climate Solutions. For example, studies identified strategic reserves that have priority for protection of their forest carbon, drinking water, biodiversity, and landscape integrity (Law et al. 2023, 2021), and provided an

analysis framework that includes spatial analysis of observations.4. Pages S-9, S-10 Alternatives; P. 13-14 2.2.1, 2.2.2 Alternatives considered but eliminated.The Alternatives fail to protect mature forests. Mature forests are a few decades away from acquiring old-growth characteristics and are essential to recovering vastly diminished old-growth ecosystems.The DEIS [ldquo]Alternatives[rdquo] would increase degradation of older forests. Compliance with international agreements and EO directives would send a message to the world that the US takes its national and international obligations seriously. This can only happen if large old trees in mixed stands, and mature and old-growth forests are protected from commercial logging and road building.5. Pgs 17-52 Sections 2.3.1, 2.3.2 Alternatives 1, 2 and 4These are not acceptable Alternatives for many reasons stated above. [ldquo]Preferred[rdquo] Alternative 2 prohibits proactive stewardship in old-growth forests for the purpose of timber production, however, it still allows commercial logging under the guise of proactive management to improve resilience and achieve desired conditions at the fastest rate.6. Pg 53, Section 2.3.5. Alternative 3 [ndash] More Restrictive Standards for Old-Growth Alternative 3 responds to recommendations to restrict all commercial timber harvest inold-growth forests to provide further protections for old-growth forests. This does not prohibit other vegetation management actions from occurring; however, it is recognized that the removal of commercial timber harvest as a management tool could impact the ability to use other tools.Alternative 3 is more responsive to EO 14072 by including stronger protections against commercial logging. However, it does not address the importance of large trees in mature forests and old-growth as a Natural Climate Solution (Law et al. 2023, 2021, 2018). Modification of Alternative 3 is essential for it to be acceptable. It should include restrictions on harvesting large trees in mature forests that could become old growth, based on their superior resistance to fire (Moris et al. 2022) in most forest ecosystems and their significant contribution to carbon stocks and high rates of carbon accumulation (Law et al. 2021). As the Intergovernmental Panel on Climate Change states, [ldquo]protecting natural-forest ecosystems is the highest priority for reducing greenhouse-gas emissions[rdquo] (IPCC AR6, p. 302). The US is a signing member, meaning that it agreed with this statement.ReferencesBerner, L.T., B.E. Law, A. Meddens, J. Hicke. 2017. Tree biomass mortality from fires, bark beetles, and timber harvest during a hot, dry decade in the western United States (2003-2012). Environ. Res. 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rangelands: Forest Service 2020 Resources Planning Act Assessment. Gen. Tech. Rep. WO-102. Washington, DC. 348 p. https://doi.org/10.2737/ WO-GTR-102.USDA Forest Service. 2024. Mature and Old-Growth Forests: Definition, Identification, and Initial Inventory on Lands Managed by the Forest Service and Bureau of Land Management. Revised. https://www.fs.usda.gov/sites/default/files/fs_media/fs_document/Mature-and-Old-Growth-Forests.pdfWhite House. 2022. Executive Order 14072 - Strengthening the Nation's Forests, Communities, and Local Economies.ATTACHMENT: Comments on DRAFT EIS_LAW (1).pdf - this is the same content that is coded in text box, it was also included as an attachment