Data Submitted (UTC 11): 8/12/2022 4:24:22 PM First name: Heron Last name: Brae Organization: Title:

Comments: Dear Secretary Vilsack and Secretary Haaland,

Thank you for taking comments on this very important topic. I strongly support the protection of mature and old growth forests on public lands. As a resident of Oregon, and a child of the 80's, I have witnessed the cutting of a large majority of the legacy forests that define this landscape. I have studied sustainable forestry and climate change, and I have made a living for years as an educator bringing people into these forests to study botany, ecology, and how we can use these plants of old growth forests for food and medicine.

I have seen that we have lots of forests that have been cut in previous decades and are now growing back overly thick and crowded. These are the forests that should be thinned for the majority of lumber we currently need. We should leave older forests, over 80 years, to mostly grow for now. We can slowly start to apply highly nuanced and individualized selective logging techniques where needed or amenable ecologically.

The thing is, each forest and stand needs specific and careful thinking about how to manage them. I believe we should be looking to the historical management of these forests by indigenous peoples, and we should be treating these places with the utmost respect and looking to long term sustainability. Clearcut logging has proven to be unsustainable, because the soil cannot replenish itself after two or three regeneration harvests. Cutting old forests is counter to our climate goals, and we need to prioritize those spaces as carbon storage and sinks to help us with the current crisis.

We need to move to a restoration forestry approach, where we thin overcrowded young forests to move them towards older successional stages. We need to nourish diversity and heterogeneity in our forests. I support the empowerment of local communities through small scale cooperatives who rely on these forests for their livelihoods. Selective logging within a healthy stand allows the forest to continue. I suggest we learn from the Menominee Tribal Forest (https://www.mtewood.com/SustainableForestry), which has been managed sustainably by the Tribe for 150 years. I believe there are some reports that say that more yield is possible this way than through a regeneration harvest model. If this selective logging method is used by people who have a relationship to the specific stands they are working in, it will allow for long term caretaking, and investment into the forests by local communities. This will empower local communities economically, and bring back our rural economies in Oregon. No more subsidizing large timber companies. Reinvest in small community based businesses.

Another important topic here is about fire. We need to make the way for fire to return to the forests in a good way. We need to recognize that thinning crowded forests is essential for wildfire mitigation, but in addition, we need to apply prescribed fire to truly create the fire-resilient, old growth and mature forest mosaics that are necessary for long term carbon storage and ecological health. Prescribed fire is the most effective tool for the prevention of wildfire destruction. This is essential for the protection of our old gowth forests for carbon storage as well. We need to be aware that more adn extreme fires are going to continue to come, and mitigating these in advance with prescribed fire will allow us to keep more carbon in living trees than doing nothing, or focusing on a wildfire suppression technique. We can never suppress all the fires, they will come. Let's make way for them to come in a good way, with less forest mortality (and thus salvage logging, which removed even more carbon from the forest).

Please protect old growth and mature forests, support localized economic development and small scale timber cooperatives and small businesses tied to specific pieces of land, and invest in prescribed fire on par with the funding currently given to fire suppression.

Thank you!