

Data Submitted (UTC 11): 8/30/2022 8:21:00 PM

First name: Juanette

Last name: Cremin

Organization:

Title:

Comments: Many years ago when the USFS was working on old-growth designation, the local agency defined "old growth" as the oldest trees in the forest. It didn't matter whether the trees were 300 years old, or 15 years old. If the trees had been spared by the forest products industry, that made them "old growth." What a stupid insult to those concerned about healthy forest environments.

Now it seems the discussion leans on definition of landscape scale and at an ecosystem scale. One acre of forest that meets a tree-by-tree definition for large trees will not confer the benefits of a 300-acre landscape, for example, where an intact ecosystem and its natural disturbances have been at play for a century. The legacy effects of wildfire, insects, and disease commonly occur in mosaics across a landscape. The ecosystem time-scale involved is long-it includes time for disturbances to kill trees, and for those trees to fall to the forest, cycling nutrients back to the soil and providing openings where new trees and shrubs can grow to create a multi-story structure.

Focus on logging is currently the biggest threat to old growth and mature forests. The largest trees which seem to be those valued by the forest products industry store the most carbon. Thinning of smaller trees and ladder fuels seems to hold no interest for industrial logging. Logging emits more carbon than wildfire, up to three times more carbon can enter the atmosphere than the wildfire that logging will purport to reduce. Wildfire is a natural disturbance for old growth; logging is not.

In sum, please define old growth at a landscape level and with an ecosystem time scale. Impose a moratorium on logging old growth. Keep mature and old growth forests intact, standing for the climate, for the wildlife, and for ourselves.