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Comments: Only 7% of forest cover in the United States today consists of old-growth forests. They provide critical wildlife habitat especially for migratory birds that raise their young, some of which include rare and endangered native flora and fauna and migratory species, they provide habitat for species diversity, they add genetics to younger forests around them, they play an essential role in carbon storage, contribute to the hydrological cycle, are nutrient rich and are revered by people for recreational and spiritual pursuits. They allow sunlight due to openings in the forest canopy to nourish the diversity of plants and young seedlings on the forest floor whereas second growth forests do not allow openings in the forest canopy.

Criteria needed to determine/define old growth forest conservation for planning and management is to complete an old growth forest inventory every ten years at a minimum, preferably once every five years considering age, species composition, structural diversity, woody debris, extreme weather cycles like severe drought, storms, destruction of riparian habitats due to overgrazing by livestock, flooding, pollution and/or toxic contamination of any streams, lakes or rivers. control the increase in wildfires caused by nature or man, oil and/or gas exploration and drilling, construction of roads, and unforeseen disturbances by man such as ORV use.

I suggest updating old-growth forest definition to not only include age of old growth forests, Conservation and preservation of, consider wilderness designation which would prohibit motorized vehicles with wildfire fighting equipment the exception, consider the biological aspects as they are crucial for maintaining native biodiversity.

It is critical to end timber harvesting in old-growth forests as they now only encompass 7% of all the forests within United States. These tracts of old growth forests in the United States including Alaska and Hawaii must be preserved and protected for future generations. This may require protecting under wilderness designation, ending logging and timber harvesting, preventing ORV's, ending livestock grazing, ending oil, gas and all mineral exploration and extraction. These forests are icons of America and take us back historically to primitive days before the arrival of Europeans and as public stewards of our public lands it is the responsibility of BLM and the USFS to preserve: and protect them for perpetuity.

You need to consider and include the old-growth Forest entire ecosystem especially relative to the forest ecology, forests successional dynamics and disturbance processes. Threats to old-growth forests include invasive species, logging and forest fragmentation, and extreme weather resulting from a changing climate which may affect migration patterns possibly resulting in the eventual extinction of some species that cannot adapt.

Thank you for considering my opinions as you update your definitions regarding future and improved management of our old growth forests into the 21st century.