

Data Submitted (UTC 11): 1/13/2024 5:58:31 PM

First name: Ara

Last name: Marderosian

Organization:

Title:

Comments: On December 19, 2023, the Biden Administration announced a proposed nationwide forest plan amendment to advance protections for the last remaining old growth trees in all 128 U.S. National Forests. The proposal, and amendment when adopted, would add new restrictions on old growth logging and is a step toward fulfilling the promise of President Biden's April 2022 Executive Order 14072, which directed the Departments of Agriculture and the Interior to develop policies to conserve and address threats to mature and old growth forests on federal lands as a natural climate solution.

Both old growth and mature forests, like the forests of the Black Ram, are essential to removing climate-warming carbon pollution from the air and storing it in their leaves, branches, trunks, roots, and carbon rich soils. These forests also provide wildlife habitat and provide clean drinking water for our communities.

Old growth forests are increasingly threatened by logging as well as the effects of human caused climate change- wildfires, drought, insects, and disease.

We need to protect not only our existing stocks of old growth forests, but also our nation's mature forests. These slightly younger forests are still developing the characteristics that will create the complex ecosystem found in an old growth forest.

The Biden proposal as written would not ban logging in old growth forests; it would merely limit cutting of old growth trees within those forests. It would also allow thinning under the guise of wildfire mitigation, counter to research that suggests that old growth forests are more resilient to fire if left alone.

We believe these loopholes should be closed-that enough old growth has been lost to logging, and that the new policies must protect from commercial logging all old growth trees and forests, as well as the mature component of our National Forest system.