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Comments: Dear Forest Service,

We must transition from the current extractive paradigm of land management, to one based on conservation and restoration. That means that we must place higher value on protecting and restoring sequestered carbon, and stop policies intended to deliver certain levels of board-foot production or other measures of extractive efficiency.

Included in this, the Forest Service must:

- Stop, prevent, and never again initiate or allow any harvests of old growth trees or forests (trees over 100 years of age)
- Stop, prevent, and never again initiate any clear-cutting of forests of any age. Clear cutting forests eliminates their value as habitat for forest species in the immediate term, reduces their value as habitat over the long term, increases the risk of wild fire by exposing formerly-shaded forest lands to sun that dries out the soil and trees, and reduces or eliminates the value of the land, especially as habitat, for restoration, and for the harvest of any other species except the harvested logs. Mushrooms and other forest species have increasing value in the marketplace; the Forest Service should work with software, such as EcoTrust's Madrona platform, to optimize land management strategies to produce the maximum blended value, not just an immediate, short-term value of logs, but a valuation that includes the value of sequestered carbon, of recreation, of habitat, of ecosystem services, and of the harvest of species such as mushrooms that can be sustainably harvested year after year with little or no impact to the ecosystem as a whole.
- Stop managing the forest road system to support extractive activities, and instead re-purpose the system to support recreation and sustainable land uses. This may in some cases result in the need to connect existing roads with trails to create trail networks, and to abandon other roads or let them return to nature when no longer needed.
- Consider working with other agencies, such as the Energy Department, Bonneville Power Administration, public and private utilities, and others, to implement a comprehensive dual-function forest fire management and prevention system that is coupled with a pumped hydro energy storage system. By placing a system of tanks, reservoirs, pumps, pipelines, and sprinklers across the forest system, this new forest hydro network could deliver high volumes of water to canopy sprinklers at ridge tops and other strategic locations that could help to contain wildfires to their drainage of origin, rather than allowing them to easily spread to adjacent drainages and become mega-conflagrations. The value of this system to protect the embodied carbon of forests could be immense; coupling it with pumped-hydro energy storage elements could also allow it to help our nation move into a post-carbon sustainable energy future, one where we're less anxious about the escalating risks of wildfire.

I'd be happy to set up a time to discuss these comments in more detail. Please, don't hesitate to reach out.

Sincerely yours,
~Garlynn Woodsong
Executive Director,
PLACE Initiative