

Data Submitted (UTC 11): 1/19/2024 9:23:06 PM

First name: David

Last name: Pedersen

Organization:

Title:

Comments: Dear Secretary Vilsack,

Thank you for proposing a nationwide plan amendment to address the long-term persistence, distribution, and recruitment of America's old-growth forest across your nation's national forest systems. This proactive and long-overdue step will help protect your country's oldest trees, but it must be significantly strengthened to truly safeguard their vital role in mitigating the climate and extinction crises. As a Canadian clean-air advocate who has witnessed the devastating loss of old-growth forests in my own province (British Columbia), I understand first-hand the importance of protecting these ecological meccas.

According to the proposed amendment as written, "vegetation management within old-growth forest conditions may not be for the primary purpose of growing, tending, harvesting, or regeneration of trees for economic reasons." If finalized, this amendment would leave a significant loophole that would allow old-growth trees to be logged nationwide, undermining the contributions old-growth forests and trees make to climate resiliency and healthy ecosystems.

The U.S. Forest Service no longer proposes projects primarily for economic reasons. While its logging projects are now ?????????????????? for things like resilience and wildfire mitigation, these terms are too often misused/exploited to allow destructive and unnecessary logging and/or road-building projects. The agency should not sell, or allow to be sold, old-growth trees - nor should it permit the ongoing destruction/fragmentation of America's old-growth forests.

As it stands, there is a serious deficit of old-growth trees and forests on federal lands. The ones that remain should be left standing so they can store carbon, provide ecological integrity, increase biodiversity, improve watershed health and air quality, and enhance wildfire resiliency.

Accordingly, I respectfully urge you to remove all language in the amendment that would leave loopholes that, ?????????? ??????????, allow old-growth trees and forests to be logged other than in ?????????? ?????????? circumstances involving imminent risk to public or personal safety.

I also request that you use this opportunity to formalize a publicly-accessible and enforceable/accountable commitment to protect mature trees - which, if left to grow, will become the old growth of tomorrow for future generations to cherish.

Thank you for your time and consideration.

Regards,

David Pedersen