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Comments: Dear Forest Service,

Currently some 370,000 acres of mature and old-growth forest on federal lands are vulnerable to logging. But we should not be selling old-growth trees on public lands, period. Old-growth forests host unique and irreplaceable characteristics quite different from younger forests and many animals that have evolved to rely partly or entirely on old-growth. Old-growth trees are peerless at storing and filtering water, providing top-quality recreation, and sequestering far more carbon than younger forests, all free services.

In particular, the administration's proposed policy language says: "Vegetation management within old-growth forests conditions may not be for the primary purpose of growing, tending, harvesting, or regeneration of trees for economic reasons." This is a massive problem, because history has shown time and again if all that's needed to log old-growth is to omit or downplay "economic" reasons, the timber industry will do so.

This proposed language would allow over a dozen exceptions to actual protection of old-growth, including "to reduce fuel hazards," "proactive stewardship," or "resiliency." Yet studies have shown that old-growth stands tend to reduce wildfire spread and intensity, while thinning them dries and heats up the area. As someone who lives near Big Basin State Park in California's 2020 CZU Fire burn zone, I'm acutely aware of this reality.

I urge the Forest Service to remove the Tongass National Forest (in Alaska) old-growth logging exemption from any further analysis in the upcoming Environmental Impact Statement. In addition, mature forests and trees, including their value as future old growth, also must be protected. National forests in certain parts of the country, for example east of the 100th meridian, have virtually no old-growth trees left. This makes protecting mature forests all the more important.

The final policy should ensure that frontline and nature-deprived communities directly benefit from the amendments, including through the development of an "equity layer" to the Forest Service Climate Risk Viewer, which would demonstrate these benefits across a diverse array of communities.