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Comments: I sincerely appreciate the Biden Administration's having initiated a process that may end with substantial protections for existing ancient and mature forests in America.

First and foremost, old-growth forest should not be logged on public lands whatsoever.

Old-growth forests are home to unique and irreplaceable characteristics quite different from younger forests.

Many animals have evolved to rely partly or entirely on old-growth.

Old-growth is unmatched in its capability of storing and filtering water, providing recreation of a sort in the highest demand by the public, and in storing far more carbon than younger forests.

My understanding is that some 370,000 acres of old-growth and mature forest on are vulnerable to or actually slated for logging on U.S. lands.

There is a glaring flaw in the administration's proposed policy language, which currently states: "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." But history has shown that if something as simple as omitting "economic" reasons, as a justification for logging, would allow the project to be approved the timber industry will do so.

Over a dozen exceptions to protection of old-growth exist in the current language-- for example reducing "fuel hazards," "proactive stewardship," and "resiliency." Many studies have shown, however, that old-growth impedes wildfire spread and reduces its intensity; thinning of old-growth dries and heats up the area.

The Forest Service should eliminate the Tongass National Forest old-growth logging exemption from the upcoming Environmental Impact Statement accompanying the final rule.

In addition, mature forests, largely on account of their role in becoming future old-growth, also should be protected. In the eastern U.S. virtually not old-growth has survived centuries of clearing.

Lastly, frontline and nature-deprived communities directly should benefit from the forest plan amendments. In this regard the development of an "equity layer" to the Forest Service Climate Risk Viewer, would exemplify these benefits across a diverse array of communities.