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First name: Amy

Last name: Payne

Organization:

Title:

Comments: I'm writing to thank you for beginning a process that I hope will end with real protections for existing old-growth and mature forests across the U.S. This is critical because currently some 370,000 acres of mature and old-growth forest on federal lands are vulnerable to logging. When an old growth forest is razed, it cannot be replaced.

Old-growth forests host unique and irreplaceable characteristics quite different from younger forests. Many ecosystems rely on the diversity in an old growth forest, and a number of animals have evolved to rely partly or entirely on old-growth. We should not be selling old-growth trees on public lands, period.

Old-growth sequesters far more carbon than younger forests. It stores water, something that will be increasingly important for humans as climate change progresses.

The administration's proposed policy language reveals an enormous problem: "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." History has shown time and again that if all that is needed to log old-growth is to omit or downplay "economic" reasons the timber industry will do so.

The proposed language will allow over a dozen exceptions to actual protection of old-growth, including "to reduce fuel hazards," "proactive stewardship," or "resiliency." However studies have shown that old-growth stands tend to reduce wildfire spread and intensity, while thinning them dries and heats up the area.

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 national forests east of the 100th meridian, have virtually no old-growth 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.

Finally, 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.

Thank you for your time and consideration of this truly critical issue.

Sincerely,

Amy Payne