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Comments: To the Director, Ecosystem Management Coordination, US Forest Service.

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Dear Director,

Thank you for this opportunity to comment on a new Amendment to the Forest Service Management Plan, with regard to old-growth and mature forests.

I live in Colorado and have a cabin adjacent to the Arapaho and Roosevelt National Forest, where I spend a great deal of time. This forest is primarily lodgepole pine, but also contains limber pine, ponderosa pine, blue spruce, Engelman spruce, Douglas fir and aspen.

With climate change, the destructive wildfires we've had in our forests in the Western US and the clear-cutting they have been doing in my local forests, I have become greatly concerned about the durability of our forests. I am especially concerned about the dwindling percentage of old-growth forests and similarly, the largest trees within the "junior" forests.

In the Arapaho and Roosevelt Forests, the Forest Service has been implementing patch clear-cuts for years now. This was originally slated to be done to combat the Rocky Mountain Pine Beetle. When the beetle epidemic was no longer a threat in our area, they changed the purpose to allegedly be for fire mitigation. However, it is hard to see how these clear-cut areas would in fact mitigate a fire, considering the intensity of the recent wildfires. A fire would easily jump or burn around these cut areas. One wonders whether the actual purpose of this cutting was economic: they wanted to sell the timber.

I believe the damage from these clear-cuts far outweighs the benefits. If these areas are not considered "old-growth" (which they might be), they must at least be "mature forests". As mature forests, they should not be clear-cut. Not only do we lose the trees from such activity, but we lose the precious soil and fungi network that we have learned is critical to forest health. I urge you to read "Finding The Mother Tree: Discovering the Wisdom of the Forest", by Suzanne Simard and/or review the website <https://mothertreeproject.org> for more information on the fungi network role in forest health. Activities, like clear-cutting with heavy machinery, destroy this fungi network and the soil. Weeds, such as thistle, then move in. The lodgepole pine on the edge of the cuts blow down and continue to be at risk for blowing down, encroaching more and more into the non-cut areas. The forest as a whole, becomes impacted! Who knows how long it will take for these cut areas to re-establish a fungi network and enriched soil base?

I encourage you to include in this proposed Amendment, protection for the "mother trees" in forests that are not yet at the old-growth or mature forest level. These larger, older trees are crucial to the survival of the younger trees, providing them with carbon, nutrients and signals for how to survive disease or pests. Please protect these older trees in all forests, but especially, in the old-growth and mature forests.

My other main concern is that this Amendment provide specificity for how each forest management team may or may not implement the policy. For example, if the supervisor of our local forest believes it will benefit an old-growth or mature forest to clear-cut patches, they should not be allowed to do so without convincing data and science to back up such a claim. Our local officials have admitted they are "learning as they go" with respect to their decision to use patch clear-cutting and on how many acres to cut! This is alarming! These trees take

decades, to over a hundred years, to grow to this stage! I urge you to be specific as to what data or science or studies are required to engage in such harmful activities.

In this regard, I urge you to provide specifics in defining the exceptions to the rule of no logging or cutting. We do not want the exceptions to swallow the rule. Please do not be vague. It needs to be clear whether an exception applies and would warrant cutting or other activity. Also, I urge you to not declare specific species of trees (such as lodgepole pine) as irrelevant to protecting old-growth and mature forests. What would happen to forests that are decades or well over one hundred years old, but are lodgepole? They also provide the benefits of absorbing carbon, providing wildlife habitat and providing clean water, do they not? Much of our forested land in the Rocky Mountain region is comprised of lodgepole.

Another important factor to consider: when the Forest Service must plant trees (such as if they are replanting a cut area), perhaps they should consider which species might do better from now into the near future, rather than planting those that did well in that area in the past. If the Earth is warming, you would expect trees that survived between 8000 and 9000 feet altitude in the past might have a better chance in the future if they are between 9 and 10,000 feet. I am not a botanist or arborist, so am not trying to provide technical, scientific information, but I urge you to gather this information when devising the draft Amendment. Maybe we can help Mother Nature get ahead of the curve on the changes coming through climate change?

My other concerns include the following: our mature and old-growth forests are habitat for countless plant and animal species-many of them highly endangered. They also help maintain ground and surface water quality and quantity, they stabilize soils and prevent erosion, and are an important part of our national heritage.

But, perhaps most urgently, research has proven that these forests are a powerful, natural tool to slow and-if given the opportunity-to mitigate the impacts of climate change. Old-growth forests act as "carbon sinks," absorbing massive amounts of carbon dioxide from the atmosphere through photosynthesis and permanently locking it away deep in the soil.

Mature forests are also especially important, given the loss of more than 85% of our old growth forests in the U.S. to logging over the past 200-300 years. These mature forests have only begun to realize their carbon sequestration potential, and if left alone will create benefits for generations to come. But this process only happens when those forests are left undisturbed from logging and development. When those forests are lost, recovery-if it's even possible-can take centuries.

Any new Forest Service rules need to give clear, meaningful, and permanent protection to mature and old-growth forests and trees from logging and other destructive practices so they can continue to help mitigate the climate and biodiversity crises.

Thank you again for your commitment to protecting, conserving, and restoring America's public forests.

Sincerely,  
Jan H  
Colorado