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Comments: We should absolutely not be selling old-growth trees on public lands. Their decimation from historical logging practices leaves those remaining as unique and precious.

Old-growth forests host different and irreplaceable characteristics quite unlike younger forests. These include the numerous animals and entire ecosystems that have evolved to rely partly or entirely on old-growth forests.

Old-growth trees are peerless at storing and filtering water, providing top-quality recreation, and sequesters far more carbon than younger forests. They filter and store more carbon than any existing thing. These are free services provided by old-growth forests.

Currently some 370,000 acres of mature and old-growth forest on federal lands are vulnerable to logging. A close look at the proposed policy language reveals at least one 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 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 would allow over a dozen exceptions to actual protection of old-growth, including "to reduce fuel hazards," "proactive stewardship," or "resiliency." Currently the catch-all phrase to reduce fire hazards is a fear tactic used continually by the logging industry to fell more trees. However studies have shown that old-growth stands tend to reduce wildfire spread and intensity, while thinning them dries and heats up the ground area causing more soil evaporation, and actually increasing fire threats.

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.