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Comments: Dear Forest Service,

I urge you to revise the proposed guidelines for protecting old-growth forests so there are no loopholes that will enable logging or thinning, for example, for "economic reasons." Currently some 370,000 acres of mature and old-growth forest on federal lands are vulnerable to logging.

Old growth forests are a unique environmental resource. Old-growth creates the best watersheds, because it's best at storing and filtering water, and they sequester far more carbon than younger forests, making them essential for counteracting global warming.

The proposed language would 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, making it more vulnerable to fire rather than less so. Mature forests and trees have great value as future old growth, and these 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. Old growth currently provides habitat for endangered species and has special recreational value to the public.

In particular, I urge the Forest Service to remove the Tongass National Forest old-growth logging exemption from any further analysis in the upcoming Environmental Impact Statement.

Thank you for your consideration.