

Data Submitted (UTC 11): 1/31/2024 8:51:40 AM

First name: Naomi

Last name: Zurcher

Organization:

Title:

Comments: I have reviewed the Notice of Intent and while I was very pleased to see the incorporation of Indigenous peoples in developing and implementing management and stewardship strategies as well as the elements included in the list of Substantive Provisions.

I remain concerned regarding the following:

* the exceptions as detailed under Standards for Management Actions, item 2b) do not provide for adequate oversight of the "responsible official" and any exclusionary decision he or she might put forward. Requiring rationale documentation is not an adequate control mechanism. There needs to be a review of the requested exception by other interested parties such as the Indigenous community.

* it is not clear when this Notice of Intent will be fully implemented and, given the urgency of the matter and the destruction that is currently taking place, it would be prudent for the USDA FS to implement a MORATORIUM ON ALL OLD GROWTH LOGGING

Every day that passes without the controls defined in the Notice is another day of destructive practices that ensure further decline of the old growth resource and the ecosystem that supports that old growth. Our current climate state-of-affairs cannot afford to wait one more day.