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Comments: I wish to add my voice to those calling for the strongest and best protection for our nation's oldest forests. I support an end to commercial logging on all public lands. We need our public lands to provide what private lands cannot: large tracts of contiguous forest habitat. Given that young forests, provided with enough time, will become old-growth forests, I would like the administration to consider setting aside ALL public lands from logging.

I wish to add my voice to the many experts and scientists who show that logging forests to prevent wildfires, in fact makes wildfires worse. This is especially true in the eastern US, where forests naturally grow dense and are designed to hold water on the landscape. These forests not only provide the mechanism by which carbon is transferred to the soil for long-term storage, the deep shade and vertical structure of these forests cools the atmosphere.

The proposed rule would allow exceptions that would mean the continued logging in old-growth forests in the name of "ecological restoration". This is an overused and misguided justification for logging on our public lands already, based on a false premise that these eastern forests were "dominated by oaks". This is a fiction, ignoring the loss of the American Chestnut (which arguably could be the species to claim landscape dominance in its day) and denying the legitimacy of actual ecological observations on the ground. Management prescriptions involving the use of fire, herbicides, and repeated thinning to "restore" an oak-dominated ecosystem is in fact farming our public lands for timber to feed the market. Our public lands should be places where natural process guide the vision for the forests of the future, not market forces. The misuse of "ecological restoration" as a justification for logging is a loophole that must be closed in this rulemaking process.

While the US Forest Service and the BLM are the primary agencies that hold the vast majority of lands with old-growth forest and grassland habitat, consideration should be given to other federal agencies that also might hold lands with important carbon-sequestering potential as old growth or future-old-growth forests. Military reservations, Housing administration, public utilities, and other unlikely agencies might have land holdings that ought to be included in this process. Urban forests in particular can play an outsized role in helping mitigate the urban "heat island" effect.

This rulemaking can also be an opportunity to work with state and county governments. Pennsylvania's vast state forests and game lands offer enormous potential for providing contiguous old-growth and future old-growth forest habitat.

Thank you for this opportunity to comment.