

Data Submitted (UTC 11): 2/1/2024 5:00:00 AM

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Organization:

Title:

Comments: Director, USFS Policy Office,

I recently heard via a friend about the Forest Service's actions to review and update policies for the management of mature and old-growth forests. I am excited and hopeful that this precious resource will hopefully be afforded additional protections from logging, harvesting, etc. in the future. I grew up in Colorado as did my relatives (going back over 100 years) and recreating in our National Forests was a staple in my family.

I live in Colorado and have a cabin in the front range area. The cabin and property backs to the Arapaho and Roosevelt National Forest. I spend hours and hours in this forest. This forest is a mix of lodgepole pine, limber pine, ponderosa pine, blue spruce, Engelman spruce, Douglas fir, and aspen.

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 projected Rocky Mountain Pine Beetle kill. The beetle kill never occurred so the purpose of the clear cut changed to allegedly be for fire mitigation. One wonders whether the actual purpose of this cutting was economic: they wanted to sell the timber. I have viewed many of the clear-cut areas, one near my cabin. The destruction and devastation of machine cutting is disheartening. The animals that frequented this are gone. The soil will take years and years to recover.

Another concern that I have is that this Amendment provides 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.

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,

Renee Reeves