Data Submitted (UTC 11): 2/1/2024 8:48:07 PM
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Comments: The EIS plan should address the following:

1) A geographically adapted approach must be taken to restoring old growth forests in the national forest system (NFS). We agree with this emphasis in the Notice. Such an approach will not use prescribed fire as a predominant management tool in the central hardwoods region.

2) Old growth forests have not been disturbed by human activities for a long period of time. In the hardwood forests of the HNF, old growth forests have had no human disturbance for at least 80 years with dominant trees being 150 years or older. Yet lack of human disturbance is absent from discussion in the Notice asking for public comment. The definition of what they are are trying to protect needs to recognize forests with lack of human disturbance -- not just old growth features that the Forest Service wants to propagate, like large trees and snags.

3) Mature forests must be protected to restore viable levels of old growth in the NFS. Mature forests are precisely what the USFS is targeting in its logging projects like the Houston South Vegetative Management and Restoration project and Buffalo Springs Restoration Project -- whether they're called logging, vegetative treatment, or ecological restoration -- all of these projects are using shelterwood cutting, clearcutting, group tree selection with openings up to 9 acres, aggressive single tree selection, and thinning that are knocking down large numbers of canopy trees. Such actions prevent a mature forest from ever becoming an old growth forest. To restore old growth forests, the Forest Service needs to leave mature forests alone. Humans can't manufacture old growth forest.

4) Monitoring is crucially important to restoring and maintaining old growth forests across the NFS. Without monitoring across the national forest system, the USFS can't be held accountable to restoring more old growth forests in the national forests.

Thank You