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Comments: Thank you for initiating this process to secure the long-term health of old-growth forests. To have taken this step is critical because so very few old-growth forestland stands are left in the United States. In California, for example, what is left of coastal old-growth redwoods is 5% of what was here prior to the 1800s.

If loggers are allowed to fell what remains, these lost forestlands will take many lifetimes to replace, if replacement is even possible.

Old-growth trees, ranging in age from 100 to over one thousand years old sequester extraordinary amounts of carbon in their leaves, branches, trunks, and roots, safely keeping it out of the atmosphere. As such, old-growth represents a nature-based solution to climate change. Old growth forests also have the greatest biodiversity, the healthiest soil and the cleanest watersheds and they provide important habitats for a wealth of wildlife from insects to birds to mammals, both large and small. They provide unique recreation opportunities, and they inspire us with their grandeur and beauty.

President Biden's laudable plan, announced in 12/23 to limit chainsaws, trucks, and other tree-harvesting infrastructure in federal lands will make the logging of existing old-growth forests less feasible, but they need more, they need stated protection status based solely on their worth as a climate solution.

And, for purposes of climate stability, biodiversity, and protections of habitats, we need more than the few remaining old growth stands.

We also need to protect millions of acres of what is future old-growth, those forests that are close in age to old-growth but not quite there. These slightly younger mature forests are developing the characteristics that will evolve into the complex ecosystem found in an old-growth forest and are already providing many of the benefits of old-growth.

The U.S. Forest Service has taken the first steps. A comprehensive, loophole-free plan to rescue and restore our forests is needed. Every single old-growth tree in national forests must be exempted from commercial logging and a move must be made to exempt mature trees as well.

Additionally, as the agency refines its old-growth proposal, I urge you to include the following:

- Undertake on-the-ground identification of old-growth stands to ensure that the proposals plan components are applied to the appropriate places.
- Clarify when proactive management can occur to ensure that management is driven by forest health needs.
- Ensure robust engagement of the public and Tribes in developing local or regional Adaptive Strategies for Old-Forest Conservation.
- Provide adequate resources to support the proposals monitoring requirements so that the efficacy of the management approaches can be assessed and adapted, as needed, to meet the proposals goals.
- Foster data transparency by publicizing information compiled through the National Old-Growth Monitoring Network, as well as information on vegetation management projects occurring either in old-growth stands or in priority fire sheds under the agency's Wildfire Crisis Strategy and instituting environmental reviews for these projects.

Thank you for recognizing the many vital functions of old-growth forests through the initiation of this process and thank you for considering my comments.

For the sake of the planet, the denizens of forests, and, indeed, for ourselves act and act now.