

Data Submitted (UTC 11): 2/2/2024 11:38:25 AM

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Comments: \*\*\*I urge you to promulgate a rule shielding all remaining old-growth forests in Forest Service custody, and thereby comply with Executive Order 14072 concerning old-growth forests, as well as the agency's long-deferred ecological responsibilities.

Our remaining old-growth forests are national treasures, whose biological value vastly outweighs the value of any timber that will be extracted from it and dumped onto markets for pulp and lumber whose gross waste into landfills is disproof of any acute need for supplemental inputs from federal land. This exchange of a high-value biological treasure for a low-value commodity of wood pulp and lumber is the exact antithesis of serving the public interest with a basis in rationality, science, and moral common sense. Sadly, through some combination of administrative inertia and professional myopia, the Forest Service management teams continue to view themselves as on-call service providers to the highly subsidized local timber racket, and beholden to politicians who direct this mercantilist arrangement, rather than as public servants to all Americans.\*\*\*

Thank you for initiating this process to secure the long-term health of old-growth forests. Although these important forests provide numerous benefits to people and to nature, they are present on only a fraction of the landscape they once covered. This reality, along with the increasing stressors that these forests face from climate change, highlights the need and urgency for national direction to secure the conservation and health of our remaining old-growth forests.

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.

Thank you for recognizing the many important values of old-growth forests through the initiation of this process, and for considering my comments.