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Comments: As a wildlife biologist by training and a natural resource manager of >30 years, I completely agree that conserving old growth forest is critical ecologically and socially. That said, it is unreasonable and irresponsible to create definitions of old growth to be used across whole Regions of the Forest Service. Forest types, disturbance history, and many other factors vary widely across most of the Regions, making any Regional definition either so vague as to be useless or applicable only to part of the Region. Many national forests put the effort into defining old growth (and mature forest) during the development of the Forest Plan. On those units, the Plan definition should be respected and used for this national policy effort. For units that lack definitions in the Forest Plan, set an expectation that one be developed based on locally applicable current science within a year and have the planning service groups facilitate those efforts.

Requiring Forests to create local management objectives to improve mature and old growth conditions within a short timeframe sounds reasonable and desirable, enabling this effort to be unit-specific. However we've seen too many of these efforts over the years that sounds feasible that take far more time, effort, and energy than originally expected and do not produce the good outcomes intended. If the agency keeps that requirement, it better be ready for the reduced accomplishments in other areas and the increase in public engagement and legal action that is likely to result. Having these management goals be a requirement for each Forest Plan revision makes more sense, even though it would take longer to apply nationally. Amend all Plans to prohibit harvest in old growth except in certain situations but do not require development of all new approaches on every unit in such a short timeframe.