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Comments: I appreciate this opportunity to comment. I am a private citizen and long-term resident of Oregon who often visits public lands managed by the USFS throughout Oregon and other western states. I use and enjoy those lands in many ways including fish and wildlife viewing and other aesthetic, cultural, recreational, and spiritual experiences. My primary academic and professional background is in fish and wildlife ecology and management and I have held various professional positions as a subject matter expert, program manager, or supervisor for private organizations, and for state and federal resource management agencies.

My enjoyment of the natural and physical features of public lands in the National Forest System has been, is being, and will continue to be directly affected by the USFS's conservation, protection, and restoration of those lands, including but not limited to public lands that are designated or proposed as National Forests, National Grasslands, Research and Experimental Areas, National Preserves, and Special Designated Areas including Wilderness Areas, Primitive Areas, Wild and Scenic Rivers, National Scenic Trails, Scenic Research Areas, and National Historic Trails. The results of this project will have significant impacts on the management of all of those public lands, and therefore on their ability to continue to provide the ecological and social functions that benefit millions of Americans. I request that these comments be added to the administrative record for this project.

Adverse impacts from accelerating loss of biodiversity and climate change require a courageous and innovative response from the USFS. Small steps toward vague and modest goals will be insufficient to meet this need. Therefore, the USFS must fully consider and choose plan alternatives that significantly strengthen the protection of old-growth and mature trees and forests. Logging of old-growth and mature trees on lands within the National Forest System must end with very limited exceptions to address human safety.

To help accomplish that task, the USFS must adopt more accurate and appropriate definitions of mature and old-growth trees that include all old-growth conditions. The Northwest Forest Plan's definitions of old-growth as trees that are 120 years old and older and of mature trees as 80 years old and older are clear and reasonable and should be retained or expanded as part of the new rule. Greater protection for mature trees is necessary for the recovery of old-growth trees and stands where they have already been logged beyond a functional, resilient condition.

The plan amendment also must include strong monitoring and accountability measures for tracking the abundance and distribution of mature and old-growth forests and to optimize the value of those areas as a natural carbon sink over time.

In conclusion, I urge the USFS to ultimately adopt a clear, meaningful, and enforceable forest plan amendment that ends the commercial logging of the remaining old-growth and mature trees that remain in the National Forest System, and to protect those trees as necessary to recover more old-growth over time.

Thank you for your attention to this comment.