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First name: Caroline

Last name: Pufalt

Organization:

Title:

Comments: Thank you for this proposal to protect and advance stewardship of old growth forests. This effort is long overdue and much needed.

I recommend the following measures to help enable the anticipated forest plan amendment to better achieve its goal.

1. Include mature trees also as worthy of protection and for special consideration in identifying existing old growth areas and areas deemed to be protected for ongoing stewardship protections.
2. Reduce/zero out the permitted situations in which old growth can be logged. the very definition of old growth implies minimal or no intrusive management. Old growth forests should represent forests left to evolve with none or only minimal human impacts. Logging itself is a threat to old growth trees and to the characteristics of old growth forest communities.
3. Acknowledge and protect old growth in a variety of forests and habitat types. However, set some basic age related criteria ( for old growth and for mature trees) which can be standard across large regions. This will avoid micro level considerations/assumptions which could hamper the larger effort.
4. Let USFS employees with relevant backgrounds only ( OTHER than timber management), make evaluations and decisions on old growth and mature forest protected areas.
5. The public needs meaningful involvement too. In preparation for this proposal the USFS has done a an old growth inventory. Each Forest needs to share that inventory with the public at the project level. Also at the project level the agency needs to share the HISTORY of old growth designation in each project area. Too often it seems the USFS plays a shell game with existing old growth acres and acres designated as future old growth. But it is very difficult ( impossible?) for the public to understand what has been the history of a logging/vegetation management project on the ground.
6. This should be obvious, but existing old growth areas and future old growth areas need to be allowed to persist. For the forest community benefits of old growth to contribute, those areas need to be protected indefinitely . Only when an old growth area is truly and naturally modified ( extreme wind or fire damage over time) and transforms to another successional stage should its status be reassessed.

Thank you for consideration of my comments.